

Exhibit H

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INITIAL STUDY

I. BACKGROUND INFORMATION

Project Title: Carmel Valley Manor

File No.: PLN240141

Project Location: 8545 Carmel Valley Road, Carmel

Name of Property Owner: Carmel Valley Manor

Name of Applicant: John Haupt

Assessor's Parcel Number(s): 169-061-012-000

Acreage of Property: 22.7 Acres

General Plan Designation: Residential - Low Density 5 - 1 Acres/Unit

Zoning District: LDR/2.5-D-S-RAZ

Lead Agency: Monterey County Housing and Community Development

Prepared By: Steve Mason

Date Prepared: January 2026

Contact Person: Steve Mason, Monterey County HCD

Phone Number: 831-759-7375

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Description of Project:

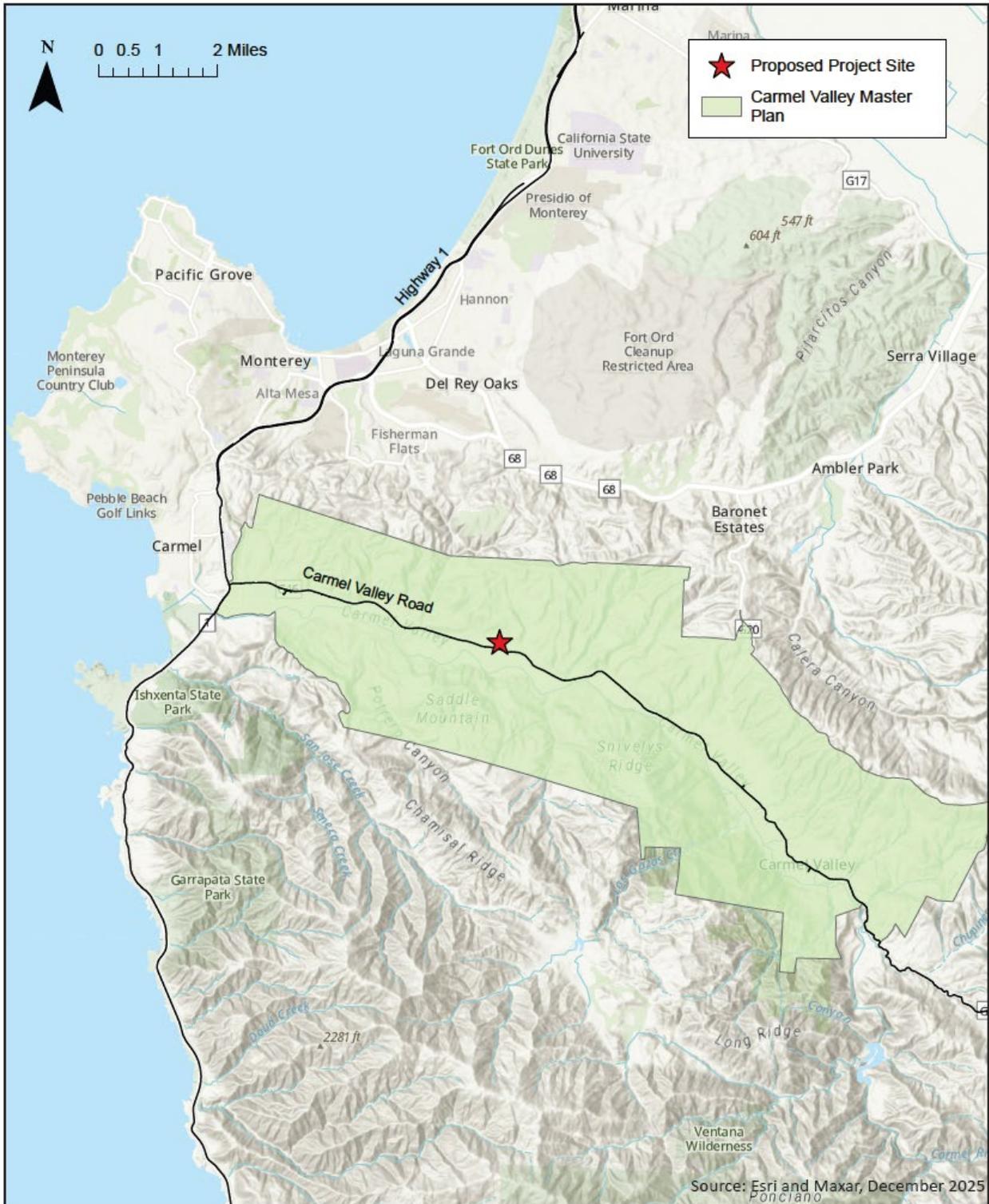
The Carmel Valley Manor Project (“Proposed Project” or “Project”) consists of a Combined Development Permit with: 1) Administrative Permit and Design Approval to allow demolition of two (2) residential units, seven (7) guest units, a wood shop, three (3) carport structures, and construction of nineteen (19) residential units, eight (8) guest units, a 12-bed memory care facility, additions to the existing fitness center and meeting house and associated site improvements including grading in the amount of 7,800 cubic yards of cut and fill; 2) Use Permit to allow development on slopes in excess of 25%; and 3) Use Permit to allow the removal of approximately 57 protected oak trees. The Proposed Project is located at the existing Carmel Valley Manor facility at 8545 Carmel Valley Road, Carmel, CA 93923, located in unincorporated Monterey County (“County”), California (**Figure 1 – Regional Map**).

Existing Operation

The Carmel Valley Manor currently operates as an assisted living and rest home for individuals 65 years and older. The facility includes 22 residential units within duplex/triplex buildings, 124 apartment units, and 7 guest units on site. Additionally, there is a health center that includes 36 “skilled-nursing” beds and 24 “assisted-living” beds. Accordingly, the facility includes a total of 146 residential units and 60 beds in the health centers. The facility operates under an existing use permit (Use Permit #624) that was issued in 1960. The current Carmel Valley Manor campus includes the following amenities: indoor and outdoor recreation facilities, dining facilities for residents and their guests, chapel, meeting facilities, library and lounges, hobby and craft shop facilities, swimming pool and exercise facilities, on-site gardens, theater and concert hall, resident sundries shop, physical therapy rooms, infirmary rooms, administrative offices, executive offices, and visitor quarters.

Proposed Improvements

Proposed improvements and planned operations would be consistent with existing use of the Carmel Valley Manor facility. Demolition of a portion of the existing facilities would be required to accommodate the improvements associated with the Proposed Project, including demolition of two (2) residential units, seven (7) guest units, a wood shop and three (3) carport structures (**Figure 2 – Demolition Plan**).



Regional Map

Figure
1

Figure 2 – Demolition Plan

NO.	REVISION	DATE
2	LOG ANNOTATIONS	11/05/2025
3	UPPER LEVEL DEMONSTRATION	08/13

SCALE

**PERKINS
EASTMAN**
ARCHITECTS
1110 CALIFORNIA STREET
SAN FRANCISCO, CA 94108
TEL: 415.774.3000

OWNER:
CARMEL VALLEY MANOR
CARMEL, CA 95021

ARCHITECT:
PERKINS EASTMAN ARCHITECTS
MONTEREY, CA 95030

CONSULTING ENGINEER:
DR. JAMES W. HARRIS, CIVIL ENGINEER
MONTEREY, CA 95030

LANDSCAPE ARCHITECT:
LAWRENCE CHAPPEL
MONTEREY, CA 95030

ARCHITECTURAL CONSULTANT:
HERMANN TRANSPORTATION CONSULTANTS
SAN JOSE, CA 95131

PLANNING CONSULTANT:
MCM MASTERPLANNING CONSULTANTS
SAN JOSE, CA 95128

PROJECT TITLE:
CARMEL VALLEY
MANOR
MASTERPLAN

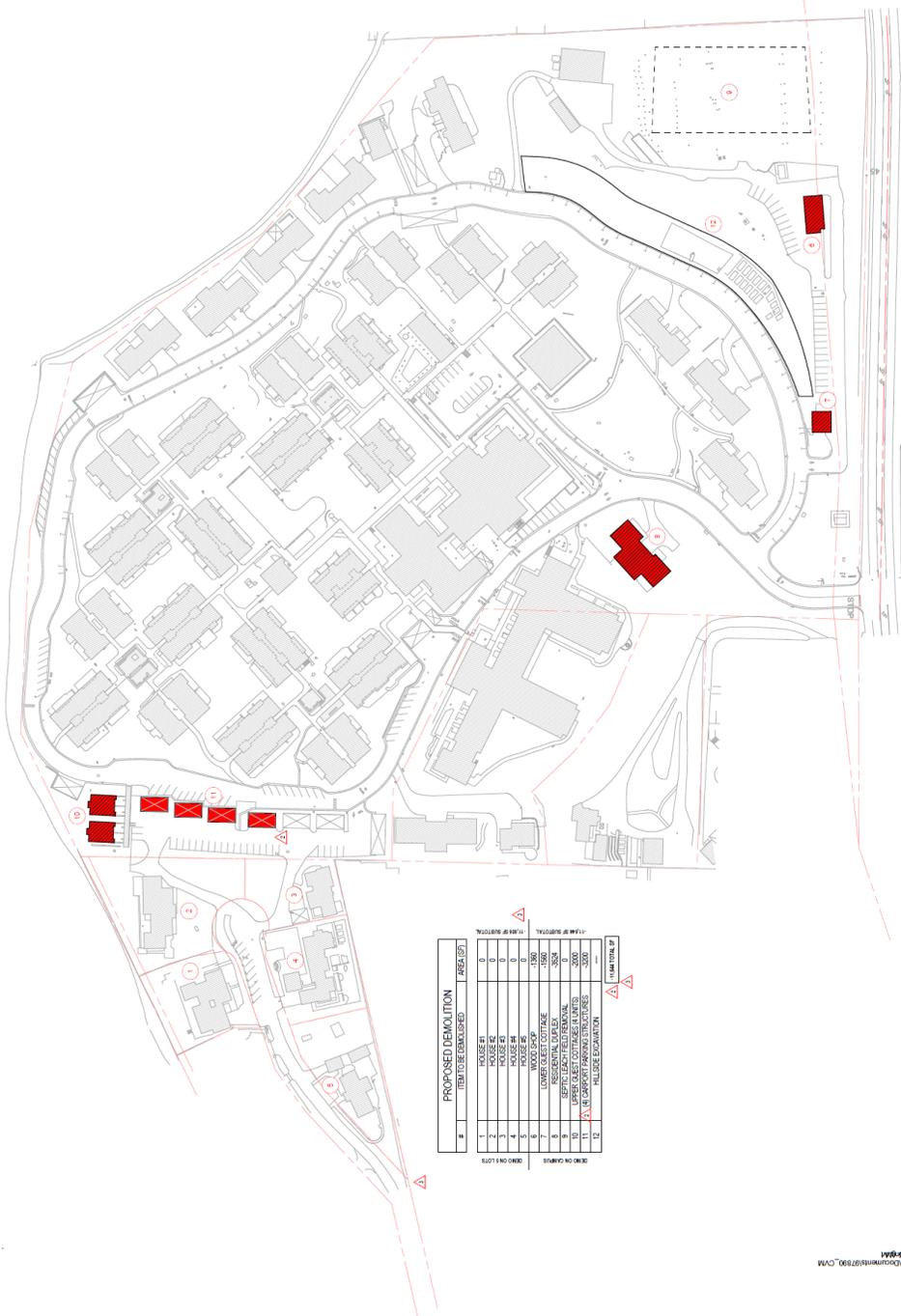
8845 CARMEL VALLEY RD.
CARMEL, CA 95021

PROJECT NO. 0017962.00

DRAWING TITLE:
ARCHITECTURAL
DEMOLITION PLAN

AS-01

MASTERPLAN SUBMITTAL
01/05/2025



#	ITEM TO BE DEMOLISHED	AREA (SF)
1	HOUSE #1	0
2	HOUSE #2	0
3	HOUSE #3	0
4	HOUSE #4	0
5	HOUSE #5	0
6	LOWER LEVEL COTTAGE	1500
7	RESIDENTIAL COMPLEX	2524
8	RESIDENTIAL COMPLEX	2524
9	UPPER LEVEL COTTAGE (4 UNITS)	1000
10	UPPER LEVEL COTTAGE (4 UNITS)	1000
11	ALL CARPORT ARRANGING STRUCTURES	1000
12	HELIXE EXCAVATION	---
TOTAL AREA		10000

1 ARCHITECTURAL DEMOLITION PLAN

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Additionally, the Proposed Project consists of the construction of 19 living units, eight (8) guest units, a 12-bed memory care facility, additions to the existing fitness center and meeting house, and associated site improvements. Other proposed improvements include the construction of a parking lot in the area of the abandoned septic field, relocated dog run and resident garden, and improvements to the trash collection and recycling facilities (**Figure 3 – Site Plan**). The Proposed Project will connect to Carmel Area Wastewater District (CAWD) as the on-site septic system has recently been abandoned.

Specifically, **Table 1** summarizes the proposed improvements:

Table 1. Project Improvements

Building Type	Residential Units Added	Unit Area (SF)	Area of Addition - Gross (SF)
Hillside Duplexes (Living Units)	9	3,430	30,870
Guest Units	8	640	5,120
Memory Care Facility	-	-	10,110
Fitness Center	-	-	1,980
Meeting House	-	-	1,650
Upper Duplexes (Living Units)	10	1,930	19,300
Dog Run & Resident Garden	-	-	5,350
Totals	27		74,380 total 55,290 residential-only

Construction

Construction of the Proposed Project would involve tractors, backhoes, compactors, excavators, rollers, dump trucks, etc. All construction loading, unloading, and parking of equipment would occur within the existing Carmel Valley Manor property. Construction staff would not park construction vehicles on adjacent roadways.

The start of construction depends on the Project approval date, seasonal factors, and the contractor’s schedule. The Proposed Project would limit construction activities to the hours between 7AM – 7PM, Monday through Saturday. No construction activities would occur on Sundays or holidays.

Demolition

The Proposed Project consists of the demolition of a number of structures, including the woodshop, lower guest cottage, two residential units (one duplex building), four (4) upper guest cottages, and three (3) carport structures. The demolition associated with the Proposed Project would result in the removal of 11,644 square feet (sf) of existing structures (**Figure 2 – Demolition Plan**). Additionally, the on-site septic system and leach field which previously served the Project site is proposed for demolition.

Figure 3 – Proposed Site Plan

NO.	REVISION	DATE
1	PLANNING RESPONSE #1	04/19/2025
2	PARCEL NUMBER IDENTIFICATION	11/05/2025
3	REVISION	DATE 3



PERKINS EASTMAN
 1000 CALIFORNIA STREET, SUITE 110
 SAN FRANCISCO, CA 94109
 TEL: 415.774.4000

OWNER:
 CARMEL VALLEY MANOR
 2500 CARMEL VALLEY RD.
 CARMEL, CA 95008

DESIGNER:
 CIVIL ENGINEERS
 1000 CALIFORNIA STREET, SUITE 110
 SAN FRANCISCO, CA 94109

GEOTECHNICAL ENGINEER:
 MARY PATRICK CONSULTANTS
 2000 CALIFORNIA STREET, SUITE 110
 SAN FRANCISCO, CA 94109

ARCHITECTS:
 BPT ARCHITECTS
 2000 CALIFORNIA STREET, SUITE 110
 SAN FRANCISCO, CA 94109

PLANNING CONSULTANTS:
 MAUREEN WICK PLANNING CONSULTANTS
 2000 CALIFORNIA STREET, SUITE 110
 SAN FRANCISCO, CA 94109

PROJECT TITLE:
 CARMEL VALLEY MANOR
 MASTERPLAN

PROJECT NO.: 20250105.00

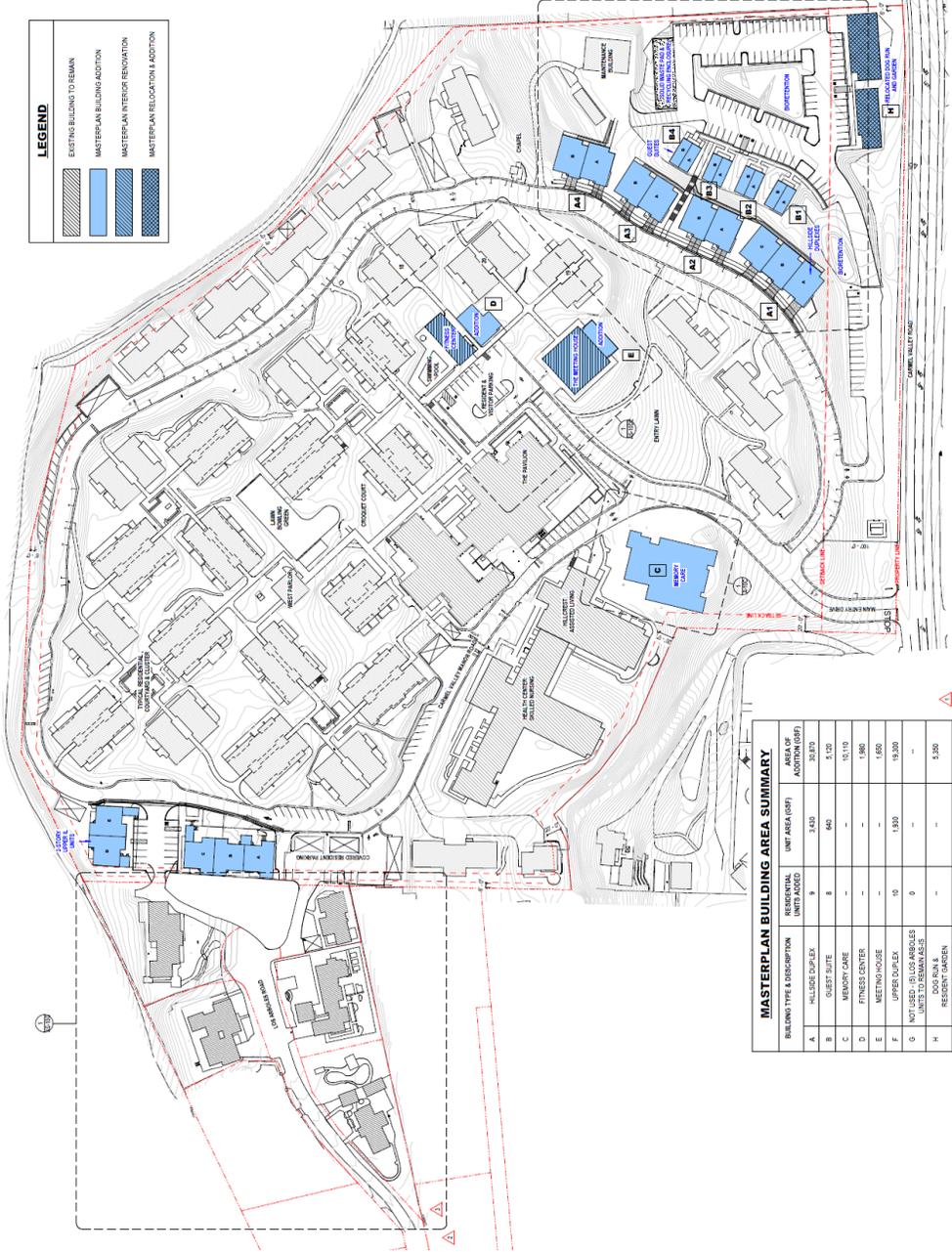
DATE: 04/19/2025

AS-02

MASTERPLAN SUBMITTAL
 01/09/2025

LEGEND

[Hatched Box]	EXISTING BUILDINGS TO REMAIN
[Blue Box]	MASTERPLAN BUILDING ADDITION
[Blue Box with Diagonal Lines]	MASTERPLAN INTERIOR RENOVATION
[Blue Box with Dotted Pattern]	MASTERPLAN RELOCATION & ADDITION



MASTERPLAN BUILDING AREA SUMMARY

BUILDING TYPE & DESCRIPTION	RECREATIONAL UNIT ADED	UNIT ADED	UNIT AREA (RSF)	AREA OF ADDITION (RSF)
A. HALLWAY DUPLEX	8	8,000	20,070	5,120
B. GUEST SUITE	—	640	—	10,110
C. MEMORY CARE	—	—	—	1,980
D. FITNESS CENTER	—	—	—	1,980
E. MEETING HOUSE	10	1,900	19,300	—
F. UPPER DUPLEX	0	0	—	—
G. NOT USED - 10 BUNGALOWS (WITH 20 CAR GARAGES)	—	—	—	—
H. RESIDENT GARDEN	—	—	—	4,990
TOTALS	27	—	74,390	—

1 ARCHITECTURAL SITE PLAN

Grading

The Proposed Project would require site grading to construct the proposed improvements. Specifically, the Proposed Project would require approximately 6,000 cubic yards (CY) of cut and 6,000 CY of fill. Therefore, construction staff would balance all grading materials on-site without the need to haul grading materials off-site.

Tree Removal

The Proposed Project would require the removal of a total of approximately 57 protected Coast live oak trees and 3 (non-protected) Monterey pines to facilitate the various Project improvements. On the recommendation of the Project arborist, the tree replanting mitigation ratio has been reduced to 1:2 to limit the fire hazard and combustible fuel load at the site. Accordingly, the Proposed Project would replant up approximately 32 coast live oak trees as mitigation (please see **Section IV.4, Biological Resources**).

Site Access and Parking

Primary access to the Proposed Project will continue to be the main driveway to Carmel Valley Road, which accommodates daily residents, visitors, and staff traffic. Additionally, there is an existing access connection located at the northern boundary of the site which links to Los Arboles Drive.

The existing Carmel Valley Manor facility includes 146 private parking spaces, 120 common standard parking spaces, and 8 accessible parking spaces for a total of 274 parking spaces on site. As part of the improvements to the Carmel Valley Manor facility, the Proposed Project would add 36 private parking spaces, 24 common standard parking spaces, and four (4) accessible parking spaces. Therefore, the Proposed Project would result in a net increase of 60 new parking spaces for a total of 334 parking spaces on-site.

Utilities

Existing utilities would be extended onsite to continue to serve the Carmel Valley Manor. AT&T would continue to provide telecommunication services and Pacific Gas and Electric Company (PG&E) would continue to provide gas and maintenance of electrical infrastructure. Electricity would be provided by Central Coast Community Energy (3CE) via PG&E infrastructure. Water would continue to be provided by California American Water Company (CalAm). The Manor has recently abandoned their septic system and leach field and connected to the Carmel Area Wastewater District, the local wastewater collection and treatment provider.

Pervious and Impervious Coverage

The Project site presently includes approximately 209,955 sf of structural coverage (19.73%) and would accommodate approximately 244,460 sf (22.99%) post-project construction. Based on these

quantities, the Proposed Project would result in a net increase of 34,505 sf of new structural coverage.

B. Surrounding Land Uses and Environmental Setting:

The Proposed Project is located at the existing Carmel Valley Manor facility located at 8545 Carmel Valley Road in unincorporated Monterey County, California. The Project site is approximately 22.15 acres. Residential land uses border the subject property to the east, and west and to the north is open space. The Mid Carmel Valley Fire Station borders the Project site to the west and Carmel Valley Road and Carmelo Pre-School Child Development Center (across Carmel Valley Road) comprises the southern boundary. The site carries a General Plan designation of Low Density Residential (LDR) and a zoning designation of LDR/2.5-D-S-RAZ. The Project site consists of the existing Carmel Valley Manor facility. **Figure 4** shows the Proposed Project site and surrounding land uses. A mix of existing low-density residential uses and public/quasi-public (PQP) General Plan-designated land uses surround the site.

C. Other Public Agencies Whose Approval is Required:

The applicant would be required to obtain ministerial building and grading permits through the HCD-Building Services, wherein construction-level review by the Monterey County Regional Fire Protection District, HCD-Planning, HCD-Engineering Services, HCD-Environmental Services and Environmental Health Bureau would also occur. Additionally, any work within the County right of way would require an encroachment permit from the County of Monterey Public Works, Facilities and Parks. No other public agency permits would be required.

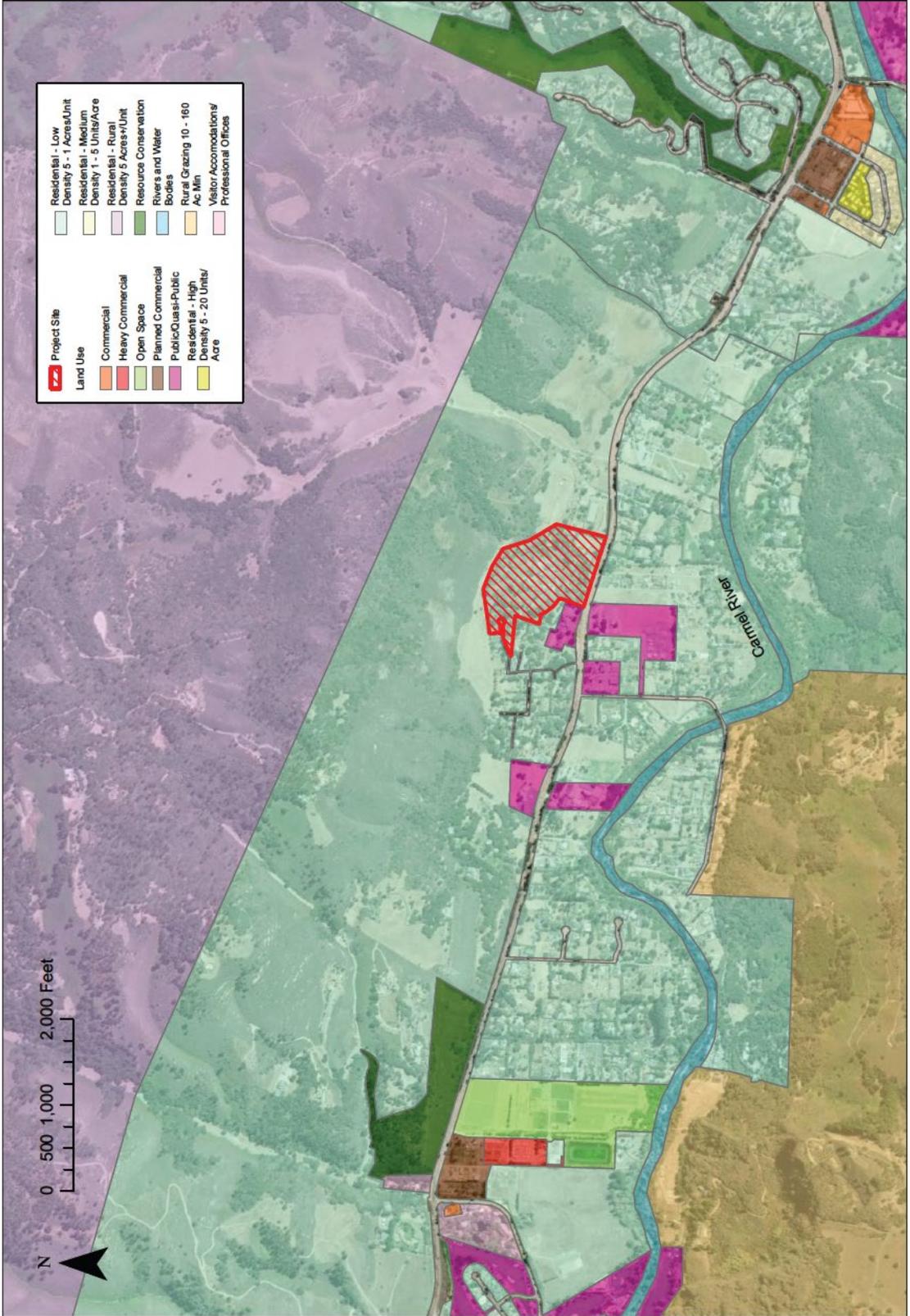


Figure 4

Land Use Map

III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan/Area Plan	<input checked="" type="checkbox"/>	Air Quality Mgmt. Plan	<input checked="" type="checkbox"/>
Specific Plan	<input type="checkbox"/>	Airport Land Use Plans	<input type="checkbox"/>
Water Quality Control Plan	<input checked="" type="checkbox"/>	Local Coastal Program-LUP	<input type="checkbox"/>

General Plan/Area Plan: The Proposed Project is located in an inland, unincorporated area of Monterey County and is governed by the policies of the 2010 Monterey County General Plan and the Carmel Valley Master Plan (CVMP) component of the 2010 Monterey County General Plan. The key policies from County General Plan that relate to the proposed Project are Policy LU-1.9 (Infill development shall be compatible with surrounding land use and development), and Policy LU-1.13 (all exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled). As discussed in **Section IV.11, Land Use**, the Project components are located within or immediately adjacent to previously developed areas of the campus, maintaining a compact footprint and minimizing new site disturbance. Additionally, Project plans include low-profile, shielded lighting fixtures designed to minimize glare and long-range visibility. CVMP Policies CV-1.1, CV-1.8, CV-1.20 are intended to preserve scenic views of the valley hillsides and maintain the rural visual character of the corridor. Policy 1.8 requires that new development be sited and designed to minimize disruption to natural landforms and tree cover as seen from public viewing areas such as Carmel Valley Road. Although construction would occur on visible slopes, the site is largely screened from the roadway by an established tree canopy and mature vegetation that would remain in place along the lower slopes. The Project’s combination of retained canopy trees, new landscaping, and architectural design consistent with existing buildings would substantially reduce visibility and preserve the scenic quality of the corridor. For additional discussion regarding land use, please refer to **Section IV.11, Land Use. CONSISTENT**

Water Quality Control Plan: The subject property lies within Region 3 of the Central Coast Regional Water Quality Control Board, which regulates sources of water quality-related issues resulting in actual or potential impairment or degradation of beneficial uses, or the overall degradation of water quality. The Proposed Project involves demolition and construction activities that could result in temporary effects (e.g., erosion). However, all construction activities would comply with the State Water Resources Control Board (SWRCB) Construction General Permit (Order 2009-0009-DWQ) and implement Best Management Practices (BMPs) to control erosion, sediment, and pollutants. Operation of the Carmel Valley Manor facility under the Proposed Project would not generate additional stormwater runoff in amounts that would cause degradation of water quality. For additional discussion on hydrology and water quality, please refer to **Section VI.10 Hydrology and Water Quality. CONSISTENT**

Air Quality Management Plan: The Proposed Project is located within the North Central Coast Air Basin (NCCAB). Air quality in the Project area is managed and regulated by the Monterey Bay Air Resources District (MBARD). MBARD has developed Air Quality Management Plans (AQMPs) and CEQA Air Quality Guidelines to address attainment and maintenance of state and federal ambient air quality standards within the NCCAB. The 2012-2015 AQMP, the 2008 *CEQA Air Quality Guidelines*, and 2016 *Guidelines for Implementing CEQA* are the most recent documents used to evaluate attainment and maintenance of air quality standards. The California Air Resources Board (CARB) uses ambient data from each air monitoring site in the NCCAB to calculate Expected Peak Day Concentration (EPDC) over a consecutive three (3)-year period. The Proposed Project involves disturbance of approximately 2-acres of the 22.7-acre site and operation of new living units, guest units, a memory care facility, and associated site improvements. However, the evaluation presented in this IS/MND does not anticipate the Proposed Project would exceed applicable air quality and greenhouse gas thresholds. For a more detailed evaluation, please refer to **Sections VI.3, Air Quality, and VI.7, Greenhouse Gas Emissions. CONSISTENT.**

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. Factors

The environmental factors checked below would be potentially affected by this Project, as discussed within the checklist on the following pages.

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forest Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology/Soils | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards/Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input checked="" type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input checked="" type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impacts (and not checked above), the following findings can be made using the Project description, environmental setting, or other information as supporting evidence.

- Check here if this finding is not applicable

FINDINGS: For the above referenced topics that are not checked off, there is no potential for significant environmental impacts to occur from either construction, operation or maintenance of the Proposed Project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE:

Agricultural and Forestry Resources: The California Department of Conservation Division of Land Resource Protection and the Farmland Mapping and Monitoring Program maps California’s agricultural resources. The Farmland Mapping and Monitoring Program designates the Proposed Project site as “Urban and Built-Up Land,” and therefore, would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation, 2025b). The Project is not zoned for agricultural use or Resource Conservation, is not designated as forest land and/or timberland and is not under a Williamson Act contract (County, 2025). Accordingly, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and would not conflict with agricultural zoning or a Williamson Act contract. In addition, the Project site is not zoned for forest land or timberland, is not located on or near forest land, and would not involve changes to the existing environment that could result in the loss of forest land or the conversion of forest land to non-forest use. Therefore, the Proposed Project would not result in impacts to agriculture and forestry resources.

Mineral Resources: Mineral resources are determined in accordance with the Surface Mining and Reclamation Act (SMARA) of 1975, and the California Geological Survey (CGS), which maps Mineral Resource Zones (MRZs) of regional significance. According to the Monterey County General Plan Environmental Impact Report (EIR), there are no lands within the CVMP designated or mapped by the State Geologist as having known mineral resources of value (County, 2013). Furthermore, there are no known mineral resources on the Project site (California Department of Conservation, 2021) and the Project site is not zoned for mineral extraction (County, 2025). As a result, the Proposed Project would not result in the loss of availability of a known mineral resources or locally important mineral resource recovery sites. Therefore, the Proposed Project would not result in impacts to mineral resources.

B. DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one

effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

*Steve Mason, Monterey County Housing and
Community Development*

V. EVALUATION OF ENVIRONMENTAL IMPACTS

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

- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista? (sources: 4, 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (sources: 4, 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (sources: 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (sources: 10, 11, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

To protect visual resources within Carmel Valley, and consistent with the CVMP CV-1.20, Design (D), and Site Control (S) district designations are applied to parcels within the Carmel Valley area. Design review for all new development throughout Carmel Valley must consider the following guidelines:

- Proposed development encourages and furthers the letter and spirit of the Master Plan.
- Development either shall be visually compatible with the character of the valley and immediate surrounding areas or shall enhance the quality of areas that have been degraded by existing development.
- Materials and colors used in construction shall be selected for compatibility with the structural system of the building and with the appearance of the building's natural and man-made surroundings.
- Structures should be controlled in height and bulk in order to retain an appropriate scale.
- Development, including road cuts as well as structures, should be located in a manner that minimizes disruption of views from existing homes.

The Proposed Project site is located at the existing Carmel Valley Manor facility located at 8545 Carmel Valley Road in unincorporated Monterey County. The Project site consists of the existing Carmel Valley Manor assisted living facility, which is developed with access roads, residential units, recreation facilities, dining facilities, landscaping, and other improvements. Under existing conditions, views of the site from public viewpoints along Carmel Valley Road are largely screened by topography, vegetation, and fencing.

The improvements to the Carmel Valley Manor facility associated with the Proposed Project would not change the existing visual character of the site; although, the improvements to the hillside duplex units on the southern portion of the site would be briefly visible from Carmel Valley Road when travelling west.

The CVMP, as amended February 12, 2013, requires that development preserve rural character through rural architectural design review (Policy CV-1.1), be visually compatible and sited to minimize disruption of views (Policy CV-1.20), minimize highly visible structures in open grassland areas (Policy CV-1.9), and not significantly block views of the viewshed, river, or distant hills from key public viewing areas including along Carmel Valley Road (Policy CV-3.3).

Aesthetic Impact (a) Less-than-Significant Impact: The Proposed Project site is located adjacent to Carmel Valley Road to the south, and residential uses to the west. There are undeveloped lands to the north of the Proposed Project site. The CVMP identifies views of the meadows and hills from Carmel Valley Road as scenic resources. However, due to existing topography, vegetation, and fencing, the Proposed Project would not substantially impact extant views of meadows and hills from Carmel Valley Road. Additionally, the improvements associated with the Proposed Project would not have a substantial adverse impact on a scenic vista and operation of the Carmel Valley Manor facility would remain consistent with the existing use of the site. As a result, the Proposed Project would have a less-than-significant impact with regards to a scenic vista.

Aesthetic Impact (b) No Impact: While the CVMP Policy CV-2.15 advocates that the County pursue County Scenic Route status for Carmel Valley Road, the County has not officially designated this road as such. The nearest and only designated County Scenic Route is Laureles Grade, located approximately 3.9 miles east of the Project site. Additionally, the nearest designated State Scenic Highway is Highway 1, located approximately five (5) miles east of the Proposed Project site (Caltrans, 2025). Due to the distance and intervening topography, the Project is not visible from either Laureles Grade or Highway 1. Therefore, the Proposed Project would have no impact on scenic resources within, or visible from, an officially designated County Scenic Route or State Scenic Highway.

Aesthetic Impact (c) Less-than-Significant Impact: The Proposed Project is located in a developed area and would be visually compatible with existing development at the Carmel Valley Manor facility. Although the “hillside duplexes” associated with the Proposed Project would be visible from those traveling on Carmel Valley Road, existing vegetation, and the speed at which cars travel on the roadway would make it difficult for drivers or passengers to notice the

new units. Consistent with CVMP design review requirements, building placement, height, and massing has been evaluated to ensure that structures are visually compatible with Carmel Valley's character and that siting minimizes disruption of public and private views. Additionally, the Project would not place new structures in open grassland areas that are highly visible from Carmel Valley Road. While limited portions of new construction may be intermittently visible from Carmel Valley Road, the Project's combination of retained canopy trees, new landscaping, and architectural design consistent with existing buildings would substantially reduce visibility and preserve the scenic quality of the corridor. Therefore, the Proposed Project would not degrade the existing visual character or quality of public views of the site and its surroundings. As a result, the Proposed Project would have a less-than-significant impact on the visual character of public views.

Aesthetic Impact (d) Less-than-Significant Impact: The Proposed Project would introduce new buildings and lighting features into an already developed institutional campus. The improvements associated with the Proposed Project includes landscape and security lighting near the new housing units and proposed parking lot. Lighting design would be consistent with the existing on-site light fixtures and all lighting would be angled downwards to avoid causing off-site light spillage and glare consistent with the requirements of the *Design Guidelines for Exterior Lighting* adopted by the County for inland areas (County, 2016), the County General Plan, and County Code Section 21.63.020 (Design Guidelines for Exterior Lighting). Adherence to County requirements would ensure that lighting fixtures, placement, and intensity are consistent with the site's institutional use and the surrounding rural setting. Additionally, consistent with the CVMP's visual compatibility objectives, the Proposed Project would minimize lighting spillover and glare on adjacent properties and public viewpoints. The Proposed Project would have a less-than-significant impact related to creating a substantial source of new light or glare.

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

Please refer to **Section IV.A**, Environmental Factors Potentially Affected. The Proposed Project would have no impact on agricultural or forest land resources.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (sources: 10, 13, 16, 17, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (sources: 10, 13, 16, 17, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations? (sources: 10, 13, 16, 17, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (sources: 10, 13, 16, 17, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

The Proposed Project is located within the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of Monterey Bay Air Resources District (MBARD). MBARD is responsible for producing an Air Quality Management Plan (AQMP) that reports air quality and regulates stationary air pollution sources throughout the NCCAB. MBARD is also responsible for measuring the concentration of pollutants and comparing those concentrations against Ambient Air Quality Standards (AAQS). Additionally, MBARD monitors criteria pollutants to determine whether they are in attainment or not in attainment (Note: "Attainment of pollutants" refers to whether a jurisdiction meets the U.S. EPA's National Ambient Air Quality Standards [NAAQS] for common pollutants). **Table 2** illustrates the attainment status for criteria pollutants.

Table 2. Attainment Status for the NCCAB

Pollutants	State Designation	Federal Designation
Ozone (O ₃)	Nonattainment – Transitional	Attainment
Inhalable Particulates (PM ₁₀)	Nonattainment	Attainment
Fine Particulates (PM _{2.5})	Attainment	Attainment
Carbon Monoxide (CO)	Monterey Co. – Attainment	Attainment
Carbon Monoxide (CO)	San Benito Co. – Unclassified	Attainment
Carbon Monoxide (CO)	Santa Cruz Co. – Unclassified	Attainment
Nitrogen Dioxide (NO ₂)	Attainment	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment

Pollutants	State Designation	Federal Designation
Lead	Attainment	Attainment

Source: Monterey Bay Air Resources District, 2017. 2012 – 2015 Air Quality Management Plan

MBARD has set air quality thresholds of significance for the evaluation of projects. **Table 3** illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during construction.

Table 3. Thresholds of Significance Construction Emissions

Pollutant	Threshold of Significance (lb./day)
Nitrogen Oxides (NO _x)	137
Reactive Organic Gases (ROG)	137
Respirable Particulate Matter (PM ₁₀)	82
Fine Particulate Matter (PM _{2.5})	55
Carbon Monoxide (CO)	550

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

In addition to these thresholds, MBARD has also determined that a significant short-term construction-generated impact would occur if more than 2.2 acres of major earthmoving (i.e., excavation) per day were to occur. Activities associated with this threshold include excavation and grading. For projects that require minimal earthmoving activities MBARD has determined that a significant short-term construction-generated impact would occur if more than 8.1 acres per day of earthmoving were to occur (MBARD, 2008).

Table 4 illustrates the thresholds of significance used to determine if a project would have a significant air quality effect on the environment during operation.

Table 4. Thresholds of Significance Operational Emissions

Pollutant	Threshold of Significance (lb./day)
Nitrogen Oxides (NO _x)	137
Reactive Organic Gases (ROG)	137
Respirable Particulate Matter (PM ₁₀)	82
Fine Particulate Matter (PM _{2.5})	55
Carbon Monoxide (CO)	550

Source: Monterey Bay Unified Air Pollution Control District, 2016. Guidelines for Implementing the California Environmental Quality Act.

CARB defines sensitive receptors as children, elderly, asthmatics, and others who are at elevated risk of negative health outcomes due to exposure to air pollution. Pursuant to California Health and Safety Code Section 42705.5, sensitive receptors include hospitals, schools, and day cares centers and such locations as the local air quality district or CARB may determine. MBARD similarly defines sensitive receptors and adds that the location of sensitive receptors be explained in terms that draw a relationship to the project site and potential air quality impacts.

Air Quality Impact (a) Less-than-Significant Impact: CEQA Guidelines Section 15125(b) requires that a project be evaluated for consistency with applicable regional plans, including the

AQMP. MBARD is required to update their AQMP every three (3) years. The most recent update was the 2012 – 2015 AQMP, which MBARD adopted in March 2017. This plan addresses attainment of the state ozone standard and federal air quality standards. The AQMP accommodates growth by projecting growth in emissions based on population forecasts prepared by the Association of Monterey Bay Area Governments (AMBAG) and other indicators. Consistency determinations are issued for commercial, industrial, residential, and infrastructure-related projects that have the potential to induce population growth. A project would be inconsistent with the AQMP if it has not been accommodated in the forecast projections considered in the AQMP. The Proposed Project consists of modifications to the Carmel Valley Manor facility, which is an existing assisted-living and rest home facility under an existing use permit. The demolition of existing units and facilities and construction of new residential units and facilities would not induce substantial population growth or result in the need for additional residential development beyond what the Project currently proposes. The total number of residential units would remain below the allowable number of units on the property (172.5). Therefore, the Proposed Project would have a less-than-significant impact to established Air Quality Thresholds, and would not conflict with or obstruct an applicable air quality plan.

Air Quality Impact (b) Less-than-Significant Impact: The MBARD 2016 CEQA Air Quality Guidelines contain standards of significance for evaluating potential air quality effects of projects subject to the requirements of CEQA. According to MBARD, a project would violate an air quality standard and/or contribute to an existing or projected violation if it would emit (from all sources, including exhaust and fugitive dust) more than:

- 137 pounds per day of oxides of nitrogen (NO_x),
- 137 pounds per day of reactive organic gases (ROG),
- 82 pounds per day of respirable particulate matter (PM₁₀),
- 55 pounds per day of fine particulate matter (PM_{2.5}), and
- 550 pounds per day carbon monoxide (CO).

According to MBARD's criteria for determining construction impacts, a project would result in a potentially significant impact if it would result in 8.1 acres of minimal earthmoving per day or 2.2 acres per day with major grading and excavation (MBARD, 2016).

The Proposed Project consists of the demolition of the woodshop, lower guest cottage, two residential units (one duplex building), septic leach field, four (4) upper guest cottages, and three (3) carport structures. The demolition associated with the Proposed Project would result in reduction of 11,644 sf of existing structures. The Proposed Project also includes the construction of 19 residential units, eight (8) guest suites, a memory care facility, fitness center addition, meeting house addition, and a dog run, relocated resident garden, and parking lot. The Proposed Project would result in a total of 74,380 sf of development, for a total impact area of 86,024 sf. This impact area square footage equates to approximately 1.97 total acres of disturbance which would not exceed MBARD's 2.2-acres of major earthmoving per day screening threshold. While the exact number of days for each phase of construction is not yet known, grading activities would occur over several weeks and no single day of grading would exceed the MBARD 2.2

acre per day screening threshold. Therefore, construction activities would not result in PM₁₀ emissions that exceed MBARD thresholds and construction related emissions would remain less-than-significant.

Project operation would result in a minor increase in emissions from a slight increase in traffic trips due to an increase in living units, guest quarters, and the memory care facility. **Section 17, Transportation and Traffic**, discusses the Proposed Project's anticipated trip generation rate. The operation of the Proposed Project would result in a net increase of 65 daily trips, increasing existing operations from 715 daily trips to 780 daily trips. Relative to existing the Carmel Valley Manor facility, the Proposed Project operation would not increase air quality emissions such that a cumulatively considerable net increase in emissions would occur. For these reasons, the Proposed Project would result in a less-than-significant impact from operational emissions.

Air Quality Impact (c) Less-than-Significant Impact: Locations where sensitive receptors congregate may include hospitals, schools, and day care centers. CARB identifies sensitive receptors as children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The existing Project site serves a senior community and is therefore considered a sensitive receptor. The Proposed Project is within 500 feet of the Carmelo Pre-School Child Development Center, which is a sensitive receptor located across Carmel Valley Road. Construction activities could result in fugitive dust that would impact Carmel Valley Manor residents and Carmelo Pre-School Child Development Center students. Per County Code Section 16.08, the Proposed Project must implement typical construction BMPs to minimize erosion and fugitive dust from leaving the Project site. The implementation of BMPs would ensure that construction related impacts to sensitive receptors on and adjacent to the Proposed Project site would remain less-than-significant.

Air Quality Impact (d) Less-than-Significant Impact: During construction activities, temporary odors from vehicle exhaust and construction equipment engines would occur. However, construction-related odors would dissipate quickly and would not cause substantial odors to sensitive receptors. As previously mentioned, the Project site is home to sensitive receptors and there is also a pre-school across the street from the Proposed Project. Contractors would be required to comply with the provisions of Title 13 of the California Code of Regulations (CCR) Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five (5) minutes to minimize unnecessary fuel consumption. Compliance with these provisions would also limit exhaust fumes. In addition, construction related odors would be temporary and would cease upon completion of construction. Operation of the Proposed Project would be consistent with existing uses and would not expose sensitive receptors to substantial odors. Therefore, the Proposed Project would have a less-than-significant impact related to other emissions, including odors.

4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (sources: 10, 11, 13, 36)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (sources: 10, 13, 36)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (sources: 10, 13, 38)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (sources 10, 13, 36)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

The Proposed Project consists of improvements to the existing Carmel Valley Manor facility that involves the demolition of two (2) residential units (one duplex building), seven (7) guest units, a wood shop and three (3) carport structures. Additionally, the Proposed Project also consists of the construction of nineteen (19) living units, eight (8) guest units, a 12-bed memory care facility, additions to the existing fitness center and meeting house, and associated site improvements. The Proposed Project is located within a developed site that serves Carmel Valley Manor residents and their guests. The Monterey County’s GIS system indicates that the site does

not have a vegetation classification and does not provide critical habitat suitable for special-status plant or wildlife species (County, 2025).

Biological Resources Impact (a) Less-than-Significant Impact: The Proposed Project consists of improvements to the existing Carmel Valley Manor facility, to include the removal of approximately 57 Coast live oak and 3 Monterey pine trees to facilitate improvements. The removal of these trees could potentially destroy nesting bird habitat. As discussed in the *Carmel Valley Manor Preliminary Tree Impact Assessment* prepared by Thompson Wildland Management, the Proposed Project has the potential to have a substantial adverse effect, either directly or through habitat modifications, on nesting raptors and other nesting avian species (Thompson, 2025). To avoid and reduce impacts on nesting raptors and other nesting avian species, the Project can schedule construction activities to avoid the nesting season. The County of Monterey has a standard condition of approval for raptor and nesting avian species, which the Project would incorporate to ensure that impacts to avian species remain less-than-significant.

PD050 RAPTOR/MIGRATORY BIRD NESTING SURVEY

For any tree or vegetation removal activity that occurs during the typical bird nesting season (February 22-August 1), the County of Monterey shall require that the project applicant retain a County-qualified biologist to perform a nest survey in order to determine if any active raptor or migratory bird nests occur within the project site or within 300 feet of proposed tree removal activity. During the typical nesting season, the survey shall be conducted no more than 30 days prior to ground disturbance or tree removal. If nesting birds are found on the project site, an appropriate buffer plan shall be established by the project biologist. (HCD - Planning)

No more than 30 days prior to ground disturbance or tree removal, the Owner/Applicant/Tree Removal Contractor shall submit to HCD -Planning a nest survey prepared by a County qualified biologist to determine if any active raptor or migratory bird nests occur within the project site or immediate vicinity.

Construction and operation of the Proposed Project would be consistent with existing operations of the Carmel Valley Manor facility. Therefore, with the implementation of the County of Monterey standard condition, the Proposed Project would have a less-than-significant impact on any species identified as a candidate, sensitive, or special-status species.

Biological Resources Impact (b) No Impact: The Project site is located on a disturbed and developed site at the existing Carmel Valley Manor facility as discussed under *Biological Resources Impact (a)*. The Proposed Project would include demolition of portions of the existing Carmel Valley Manor facility and associated improvements to the facility. The Proposed Project site is located outside of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations. Therefore, no impact to riparian habitat or other sensitive natural communities would occur because of the Proposed Project.

Biological Resources Impact (c) No Impact: The Project site is located on a disturbed and developed site at the existing Carmel Valley Manor facility, and the Proposed Project does not include any new development near state or federally protected wetlands. Furthermore, according to the United States Fish & Wildlife Wetlands Inventory wetlands mapping tool the Proposed Project site is located outside of any riparian or wetland areas (USFWS, 2025). As a result, the Project would have no impact on riparian or wetland resources.

Biological Resources Impact (d) No Impact: The Project site is located on a disturbed and developed site at the existing Carmel Valley Manor facility as discussed under *Biological Resources Impact (a)*. The Project would not involve any new development outside of the existing development footprint. Additionally, there would be no permanent site improvements that could interfere with the movement of any wildlife species. Therefore, no impact would occur.

Biological Resources Impacts (e) Less-than-Significant Impact with Mitigation: The Proposed Project is subject to Monterey County Code Section 21.64.260, which establishes requirements for the removal or damage of native oak trees within the inland areas of unincorporated areas of the County, including the Project site. Under the County Code Section 16.60 (Preservation of Oak and Other Protected Trees) the Proposed Project would require a tree removal permit for damage to or removal of one (1) or more protected trees, and a forest management plan would be required for damage to or removal of three (3) or more protected trees. Several coast live oak trees occur within the Project site and the Proposed Project would remove approximately 57 coast live oak trees due to their location within or directly adjacent to development activities. Additionally, the Proposed Project would also remove three (3) Monterey pines due to construction impacts and hazard concerns. However, Monterey pines do not have County protection status in the inland area of Carmel Valley, so no removal permit would be necessary. Because the Proposed Project would remove approximately 57 native coast live oak trees, construction could result in a potentially significant impact due to the conflict with County Code Section 16.60 (Preservation of Oak and Other Protected Trees). Therefore, the Proposed Project shall be subject to the following mitigation measure to reduce potential impacts to coast live oak trees within the Carmel Valley Master Plan area.

Mitigation Measure BIO-1. Tree Protection and Replacement Plan:

Prior to issuance of grading or building permits, the project applicant shall prepare a Tree Protection and Replacement Plan (TPRP), prepared by a Monterey County-qualified professional forester, as selected from the County's list of Consulting Foresters, and approved by the Monterey County Housing and Community Development Department (HCD).

The TPRP shall be consistent with the April 13, 2025, Thompson Wildland Management Pre-Construction Tree Impact Assessment and shall comply with Carmel Valley Master Plan Policies CV-4.1 through CV-4.3. The TPRP shall include a Tree Inventory and Assessment and identify which trees would be preserved and which are proposed for removal due to development and map and tag all oak trees on the Project site, noting

species, diameter at breast height (DBH), condition, and canopy extent. The TPRP shall also include tree protection and fencing around the dripline of all preserved oaks prior to grading work commences. Grading, trenching, soil compaction, and material storage within the protected area shall be prohibited. Construction activities shall be monitored by the project arborist during initial grading near retained trees. The TPRP shall also provide a tree replacement plan that includes sufficient tree replacement mitigation for the removal of all native oak trees, per the requirements of Monterey County Code Section 16.60. Replacement of trees at a minimum 1:1 ratio for all removed oaks 6–23 inches DBH and a 2:1 ratio for landmark oaks (≥ 24 inches DBH), unless the County determines that equivalent canopy restoration is provided. On the recommendation of the Project arborist, approximately 32 coast live oak trees would be replanted as mitigation. The tree replanting mitigation ratio has been reduced, from the customary 1:1 to 1:2, to limit potential fire hazard and combustible fuel load at the site. Tree replacement planting shall occur on-site where feasible, with priority locations at the hillside mitigation areas identified on the BFS Landscape Plan set (April 18, 2025). Tree replacement could occur off-site within the same watershed if on-site space is limited. All replacement trees shall be maintained and monitored for a minimum of five (5) years, with at least 80% survival required at the end of the monitoring period. The applicant shall provide final results of the TPRP annually to Monterey County HCD.

With the implementation of mitigation measure BIO-1, the Proposed Project would have a less-than-significant impact on native wildlife species.

Biological Resources Impacts (f) No Impact:

The Project site is located on a disturbed and developed site at the existing Carmel Valley Manor facility as discussed under *Biological Resources Impact (a)*. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other applicable plans that apply to the Project site. Therefore, the Proposed Project would have no impacts related to conflicting with any local policies or ordinances protecting biological resources or an adopted habitat conservation plan or other approved local, regional, or state habitat conservation plan affecting the subject property.

5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (sources: 10, 13, 22, 25, 27, 28, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (sources: 10, 13, 28, 29, 41)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries? (sources: 10, 13, 28, 29, 41)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Archaeological Resources: Historic Resource Associates completed a Phase I Archaeological Assessment for the Carmel Valley Manor property by Historic Resource Associates in October 2024. The study included a records search at the Northwest Information Center (CHRIS, Rohnert Park); archival review of state and federal historic registers; and an intensive pedestrian field survey of accessible portions of the site.

The project parcel lies approximately 0.5 miles northeast of the Carmel River in an area mapped by Monterey County as having moderate archaeological sensitivity. According to the NWIC search, no recorded archaeological sites lie within ½ mile of the property, though one (1) known pre-contact Esselen trail segment (Carmel River/Esselen Trail, P-27-004056) occurs slightly beyond that distance, following the Carmel River valley.

The Phase I Archaeological Assessment included a full field reconnaissance covering both disturbed and potentially undisturbed ground. The report notes that more than 80 percent of the property has been previously graded, landscaped, or built upon, reducing the potential for intact deposits. The pedestrian survey did not identify archaeological artifacts, features, or midden soils.

The State of California requires that ground disturbing activities cease if construction activities unearth unanticipated human remains until the County Coroner has made the necessary findings as to the origin and disposition pursuant to State Health and Safety Code Section 7050.5 and Public Resources Code (“PRC”) Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner must notify the Native American Heritage Commission within 24 hours, which would then determine and notify a most likely descendant. The most likely descendant shall complete the inspection of the site and make recommendations to the

landowner within 48 hours of being granted access. The find must be treated in accordance with PRC Sections 5097.9 and 5097.933.

Historical Resources:

The project site is located, in part, on the site of the former Noel Sullivan Estate (also known as “Hollow Hills Farm”). Mr. Sullivan was well-known as a patron of the arts and hosted a distinguished list of guests at the Estate including actors Charlie Chaplin, Douglas Fairbanks, Joan Fontaine and Greer Garson, and musical artists Duke Ellington, Cole Porter and Yehudi Menuhin. Famous African American author Langston Hughes lived at the Estate for a year in the early 1930’s, where he penned his iconic short story collection “The Ways of White Folks.”

Noel Sullivan passed away in 1956 and the property was sold to Northern Congregational Retirement Homes, Inc. (AKA Carmel Valley Manor) and the establishing Use Permit for Carmel Valley Manor was approved by the Monterey County Planning Commission on July 26, 1960. Original plans had called for the Sullivan Estate to be integrated into the design of the Carmel Valley Manor. However, a fire on New Years Day, 1962, destroyed most of the Estate structures including the 6-bedroom main house and the music room. A small chapel building (“Hollow Hills Chapel”) and an adobe groundskeeper’s cottage (now labeled “Bldg. 25”) survived the fire and have been retained. These remaining original structures will not be altered or affected by this project.

Two (2) recent historic resource evaluations were prepared for the Carmel Valley Manor property:

- “*Carmel Valley Manor Master Plan Phase Two Historic Assessment*” (Archives & Architecture, February 10, 2025); and
- “*PAST Consultants Historic Review and DPR 523A/B Forms*” (PAST Consultants, June 3, 2024, updating 2013 DPR records).

These studies collectively evaluate the architectural and historical significance of the Carmel Valley Manor campus and the potential effects of the proposed Master Plan. The following summarizes the professional determinations in these reports and evaluates the findings under CEQA Guidelines Section 15064.5.

Cultural Resources Impact (a) Less-than-Significant Impact: In accordance with CEQA Guidelines Section 15064.5, a historical resource is defined as any resource listed in, or determined eligible for listing in, the California Register of Historical Resources (“CRHR”), or one that is included in a local register of historical resources. A project that may cause a substantial adverse change in the significance of a historical resource would have a significant effect on the environment (PRC Section 21084.1).

The PAST Consultants evaluations (2013, updated 2024) determined that the Carmel Valley Manor complex, designed in 1962–1963 by the renowned architectural firm Skidmore, Owings & Merrill (“SOM”) with landscape design by Sasaki, Walker & Associates, is eligible for local

listing (National Register Status Code 3S) for its association with modern residential design principles and as an early example of SOM's California institutional work. However, the consultants also identified that the buildings proposed for demolition—including guest cottages, residential units, wood shop, and single-family residences—do not contribute to the property's significance, having undergone extensive alterations and lacking integrity of materials and design.

The 2025 Historic Assessment by Archives & Architecture further reviewed the Proposed Project and concluded that the planned improvements comply with the Secretary of the Interior's Standards for Rehabilitation. The analysis found that the Proposed Project avoids substantial adverse changes to the character-defining features of the SOM-designed campus, preserves integrity of setting and materials, and would not impair the eligibility of the historic buildings, most of which are centralized within the middle of the property in an area referred to as the "core campus."

Based on the findings of these studies, the Carmel Valley Manor property, while recognized for its local architectural and historic value, would not experience a substantial adverse change in significance as defined under CEQA. The Proposed Project would maintain the property's overall eligibility and integrity. Therefore, potential impacts to historical resources would be less than significant.

Cultural Resources Impacts (b) and (c) Less-than-Significant Impact: Because of the extensive ground disturbance associated with original construction in the 1960s, later additions, and infrastructure installation, the project archaeologist concluded that there would be an extremely low likelihood of encountering buried cultural materials. The records search and field survey did not discover archaeological resources, and no evidence suggests that the site contains intact subsurface deposits. The Proposed Project involves redevelopment and minor grading within areas that have already been heavily disturbed. Consequently, the Project would have a very low potential to cause a substantial adverse change in the significance of an archaeological resource.

The following reflects CEQA Guidelines Section 15064.5, Public Resource Code (PRC) Sections 21083.2 and 5097.98, and the County's Cultural Resources Standard Conditions of Approval (applied to projects countywide):

Based on the 2024 Phase I Archaeological Assessment and prior disturbance of the property, the Carmel Valley Manor Master Plan would not cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5.

Although the Phase I Archaeological Assessment (Historic Resource Associates, October 2024) found no evidence of archaeological materials within the Project area and determined that the likelihood of encountering buried cultural deposits is very low due to previous grading and development, there remains a limited potential for unknown subsurface resources to be uncovered during ground-disturbing activities. To ensure protection of any unanticipated

discoveries, the Project would implement standard County procedures for the inadvertent discovery of archaeological resources and human remains.

Implementation of the following conditions would ensure proper evaluation and treatment of any finds consistent with CEQA Guidelines Section 15064.5, thereby ensuring potential impacts to a less-than-significant level.

Mitigation Measure CR-1 (Inadvertent Discovery of Archaeological Resources and Human Remains)

If previously unidentified cultural or archaeological resources are discovered during ground-disturbing activities (including clearing, grading, trenching, or excavation), work shall be halted within 100 feet of the find until a qualified professional archaeologist, meeting the Secretary of the Interior’s Professional Qualifications Standards, can evaluate the discovery and recommend appropriate treatment.

If the archaeologist determines that the find qualifies as a historical or unique archaeological resource under CEQA Guidelines Section 15064.5 or PRC Section 21083.2, the resource shall be avoided, if feasible, or treated in accordance with an approved mitigation plan prepared by the archaeologist and reviewed by the Monterey County Housing and Community Development Department (“HCD”).

If human remains are encountered, work shall stop immediately in the vicinity of the find. The Monterey County Coroner shall be contacted pursuant to Health and Safety Code Section 7050.5. If the remains are determined to be of Native American origin, the Native American Heritage Commission (“NAHC”) shall be notified within 24 hours to identify a Most Likely Descendant (“MLD”) who shall provide recommendations for respectful treatment and reinterment, consistent with PRC Section 5097.98.

Work shall not resume in the area of the find until all appropriate treatment measures have been completed to the satisfaction of the archaeologist and the County HCD.

Implementation of this measure would not constitute required mitigation under CEQA, as the project impacts are considered less-than-significant.

6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (sources: 5, 9, 10, 13, 42)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (sources: 5, 9, 10, 13, 42)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

PG&E is the primary electric and natural gas service provider in Monterey County. In 2018, all PG&E customers within Monterey County were enrolled in 3CE, formally known as Monterey Bay Community Power. 3CE is a locally controlled public agency providing carbon-free electricity to residents and businesses (3CE, 2025). 3CE works through PG&E to provide billing, transmission and distribution, grid maintenance, and natural gas service. The Project is connected to CAWD for sanitary service and would include underground utility connections for electrical and communications systems.

Energy Impact (a) Less-than-Significant Impact: Construction of the proposed buildings and site improvements would involve temporary energy use, primarily from diesel and gasoline-powered equipment and trucks used for grading, material delivery, and worker transport. Construction activities would occur intermittently and are typical of projects of this scale. The Project would balance approximately 6,000 CY of cut and fill on-site, thereby reducing fuel use otherwise associated with off-hauling materials. Construction equipment would comply with CARB emission and idling standards, which also improve fuel efficiency. Therefore, construction energy consumption would not be wasteful or inefficient.

Demolition of existing on-site structures, including seven (7) guest units, two (2) residential units (one duplex building), a woodshop, and carport structures totaling approximately 11,644 sf, would require short-term energy use for equipment operation, debris processing, and hauling. Demolition activities would be typical of projects of this scale and duration and would not involve unusual energy demands.

Consistent with County Code Section 10.40 (Construction and Demolition Debris Recycling Ordinance), the Project would prepare a Construction and Demolition (“C&D”) Waste Management Plan and achieve a minimum 65-percent diversion rate through reuse or recycling of asphalt, concrete, metals, and wood materials. Implementation of these requirements would substantially reduce the embodied energy associated with producing and transporting new

materials. Compliance with C&D diversion standards and California Green Building Standards Code (“CALGreen”) Section 5.408 (Construction Waste Reduction) ensures that demolition energy consumption would not be wasteful, inefficient, or unnecessary.

The expanded Carmel Valley Manor campus would consume electricity and natural gas for heating, cooling, lighting, and appliances. All new buildings would comply with CCR Title 24 (Part 6) Energy Efficiency Standards and CALGreen building standards in effect at the time of building permit issuance. These codes require high-efficiency building envelopes, lighting controls, and low-energy HVAC systems. In addition, the Project would connect to PG&E’s regional electrical grid, which increasingly incorporates renewable energy sources consistent with the California Renewables Portfolio Standard (RPS). The facility would continue operation as a senior residential community with vehicle trips limited to residents, employees, and visitors. Therefore, transportation-related fuel consumption would remain consistent with existing use patterns.

Accordingly, construction and operational energy use would not be wasteful, inefficient, or unnecessary, and impacts would be less-than-significant.

Energy Impact (b) Less-than-Significant Impact: The Project would comply with all applicable state and local energy codes and conservation requirements, including CCR Title 24, CALGreen, and the Monterey County Climate Action Plan (County, 2024). These regulations promote building design and construction practices that reduce energy consumption and greenhouse gas emissions through the application of energy-efficient materials, lighting, and equipment.

The Project proposes to modernize existing campus systems, including conversion to energy-efficient lighting, heating, and water infrastructure. New buildings would include energy-efficient lighting and HVAC systems; the Proposed Project would modernize and update existing electrical and water systems in compliance with the CALGreen mandatory mechanical requirements; and connection to CAWD will reduce energy and maintenance demands associated with the defunct on-site septic system. The Project design does not preclude the future installation of renewable energy systems (e.g., solar photovoltaic panels) and is compatible with County renewable energy policies.

Therefore, the Project would not conflict with or obstruct implementation of state or local plans for renewable energy or energy efficiency. Impacts would be less-than-significant.

7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (sources: 2, 10, 13, 26) Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking? (sources: 2, 10, 13, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction? (sources: 10, 13, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides? (sources: 10, 13, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil? (sources: 10, 13, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (sources: 10, 13, 21, 22, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Chapter 18B of the Uniform Building Code (1994), creating substantial risks to life or property? (sources: 10, 13, 22, 26)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (sources: 10, 13, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a paleontological resource or site or unique geologic feature? (sources: 23, 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

Seismicity and Fault Zones

The geologic structure of central California is primarily a result of tectonic events during the past 30 million years. Faults in the area are believed to be a result of movements along the Pacific and North American tectonic plate boundaries. The movements along these plates are northwest-trending and largely composed of the San Andreas Fault system. Monterey's complex geology is a result of changes in sea level and tectonic uplifting. Geologic units in the region have been displaced by faulting and folding. Granitic basement and overlying tertiary deposits have been juxtaposed along many of the northwest/southeast-trending faults. This report relies on data from the County's GIS viewer in the following analysis, as well as the Department of Conservation's Earthquake Hazards Zone Application ("EQ Zapp").

Arias Geotechnical, Inc. prepared a Geotechnical Engineering Report for the Carmel Valley Manor Improvements Project (Arias, 2024). The study included soil borings to depths of nearly 50 feet, laboratory testing, and engineering analyses to evaluate the suitability of site soils for the proposed improvements. According to the report, dense sandy and silty soils with some clay content underly the Project site, which is typical of the older river-terrace deposits found in the Carmel Valley. These materials are generally stiff and stable. The study did not encounter groundwater during exploration, and the study did not identify active faults, landslides, or other geologic hazards on or near the site. The geotechnical engineer concluded that the property is suitable for the planned development, provided that the recommended grading and foundation measures are followed during construction.

Geology and Soils Impact (a.i) No Impact: The Project is in a seismically active region with mapped faults that have the potential to generate earthquakes that could cause significant ground shaking at the Project site. The Proposed Project is not located within any of the Alquist-Priolo Earthquake Fault Zones established by the Alquist-Priolo Earthquake Fault Zone Act of 1972 (California Department of Conservation, 2025a). No known active faults cross the Project site. Surface ground rupture occurs at sites traversed by, or that lie near, an active fault. Therefore, the Project would not result in potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of known earthquake faults. There would be no impact.

Geology and Soils Impacts (a.ii, a.iii, a.iv) Less-than-Significant: The Project site is situated within a region traditionally characterized by relatively moderate seismic activity, and earthquakes along faults in the region are expected to generate strong ground shaking at the site. All structures would comply with the current California Building Code (CBC), which provides minimum standards to reduce the risk of damage or collapse during seismic events. The Arias Geotechnical Report provides design parameters and foundation recommendations that account for regional seismicity.

The Proposed Project would incorporate design measures to meet the requirements of the CBC and its seismic design provisions. Compliance with the CBC would ensure that the Project would not expose people and structures to potential substantial adverse effects, including the risk of

loss, injury, or death related to ground shaking. The Arias Geotechnical Report found the on-site soils to be generally stable and well-drained, with low potential for landsliding or settlement. The dense nature of the subsurface materials and the absence of groundwater indicate a very low risk of liquefaction or lateral spreading during an earthquake. As a condition of the building permit, recommended actions of the Arias Geotechnical Report must be incorporated in the construction of the Proposed Project. Therefore, impacts related to strong seismic ground shaking would be less-than-significant. Compliance with the CBC and implementation of the geotechnical recommendations, impacts related to seismic shaking, ground failure, and liquefaction would be less-than-significant.

Geology and Soils Impact (b) Less-than-Significant Impact: Construction would involve approximately 6,000 cubic yards of balanced cut and fill, mainly within areas already disturbed by existing development. Site grading would occur on previously developed hillsides, with cuts/fills balanced on-site. The Arias Geotechnical Report prescribes standard erosion-control and drainage practices—e.g., keying/benching of fills on slopes, subsurface drains that discharge in a non-erosive manner, finish grading to carry runoff away from improvements, and prompt stabilization of disturbed soils with vegetation or other means. The report recommendations regarding site preparation, soil compaction, and surface drainage improvements would help to prevent erosion and maintain stability. Additionally, during construction, the Project would be subject to the Monterey County Grading and Erosion Control Ordinances and the State Construction General Permit, which require preparation of an Erosion and Sediment Control Plan and use of BMPs such as silt fences, fiber rolls, and storm drain inlet protection. Implementing these measures during construction, together with County erosion-control requirements, would avoid substantial erosion or topsoil loss, and this impact would be less-than-significant.

Geology and Soils Impact (c) Less-than-Significant Impact: The Monterey County Soil Survey (MCSS) identifies four (4) soil groups on-site: Santa Ynez fine sandy loam (mapping symbol ShE) is the predominant soil group, occurring within the northerly two-thirds of the site; Lockwood shaly loam (LeC) occurs in the southeastern portion of the site; and Xerorthents (mapping symbol Xd) occurs in the southern half of the site, stretching across the entire site longitudinally. The fourth soil group is Pico fine sandy loam (mapping symbol Pf), occurring in the southeastern corner of the Project site but does not occur within the proposed areas of improvements. The Arias Geotechnical Report found the on-site soils to be generally stable and well-drained, with low potential for landsliding or settlement. The site is primarily in a low liquefaction potential zone. Mapping cited in the Arias Geotechnical Report shows mostly low landslide susceptibility with a small northeastern area of moderate hazard. Field exploration (19 borings to depths of 10–49 feet) did not encounter groundwater. The dense nature of the subsurface materials and the absence of groundwater indicate a very low risk of liquefaction or lateral spreading during an earthquake (Arias, 2024).

The report recommends managing cut/fill transitions for proposed units and provides construction-phase recommendations, including that slopes be benched and keyed into firm native soil, and that drainage improvements—such as subdrains and surface swales—be

incorporated to control runoff and prevent saturation of slope areas. As a condition of the building permit, the Project must incorporate recommended geotechnical actions in the construction of the Proposed Project. Implementation of the recommendations included in the Arias Geotechnical Report would reduce the risk of landslides to a less-than-significant level. With adherence to these recommendations and to County grading standards, the Project would not result in unstable conditions, and impacts would be less-than-significant.

Geology and Soils Impact (d) Less-than-Significant with Mitigation: Laboratory testing showed that near-surface soils have low to moderate expansion potential, meaning they can expand slightly when wet and shrink when dry. The geotechnical engineer recommended standard foundation designs – such as deeper footings bearing on firm native soil and moisture control around foundations – to reduce this risk. Following these recommendations would prevent damage to structures from soil expansion and shrinkage.

GEO-1 (Geotechnical Design Compliance):

Prior to issuance of grading or building permits, the applicant shall submit final grading and foundation plans to the Monterey County Housing and Community Development Department (“HCD”) for review and confirmation of consistency with the recommendations of the Arias Geotechnical Report (December 24, 2024).

During construction, the Project’s Geotechnical Engineer of Record shall coordinate with the applicant to verify compliance with the report’s recommendations and County standards. The Applicant will be responsible for coordinating inspections during grading and foundational work with County to ensure compliance with the recommendations from the Geotechnical Report.

Implementation of this mitigation would ensure the Project conforms to applicable building and safety requirements, thereby reducing potential impacts related to seismic hazards, soil instability, or expansive soils, to a less-than-significant level.

Geology and Soils Impact (e) No Impact: The existing on-site septic system has been phased out and the Carmel Valley Manor is now connected to CAWD. As the CAWD system treats wastewater off-site, soil characteristics are not relevant to wastewater disposal and there would be no related impact.

Geology and Soils Impact (f) No Impact: “Paleontological resources” are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, and diagnostically or stratigraphically important, as well as those that add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. They include fossil remains of large to very small aquatic and terrestrial vertebrates, remains of plants and animals previously not represented in certain portions of the stratigraphy, and assemblages of fossils that might aid stratigraphic correlations – particularly those offering data for the interpretation of tectonic events, geomorphic evolution, paleoclimatology, and the relationships of aquatic and terrestrial species. Most of the fossils found in Monterey County are of marine life forms and form a record

of the region’s geologic history of advancing and retreating sea levels. A paleontologist documented a review of nearly 700 known fossil localities within the County in 2001. This report identified 12 fossil sites as having outstanding scientific value (Rosenberg and Clark, 2001). The Project site is not located on or near any of the identified fossil sites. Therefore, the Proposed Project would have no impact on paleontological resources.

8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 10, 13, 16, 17, 18, 23)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 10, 13, 16, 17, 18, 23)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Various certain gases in the earth’s atmosphere, when exceeding naturally occurring or ‘background’ levels due to human activity, create a warming or greenhouse effect, and are classified as atmospheric greenhouse gases (GHGs). These gases play a critical role in determining the earth’s surface temperature. Solar radiation enters the atmosphere from space and a portion of the radiation is absorbed by the earth’s surface. The earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, the radiation that otherwise would have escaped back into space is retained, resulting in a warming of the atmosphere known as the “greenhouse effect.” Among the prominent GHGs contributing to the greenhouse effect, or climate change, are carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs). Human-caused emissions of these GHGs which exceed natural ambient concentrations are responsible for the greenhouse effect. In California, the transportation sector is the largest emitter of GHGs.

MBARD has not yet adopted a threshold for construction-related GHG emissions but recommends utilizing thresholds set by neighboring districts (e.g., Sacramento Metropolitan Air Quality Management District [SMAQMD]). SMAQMD, in April 2020, adopted an updated threshold based on the 2030 target year. According to SMAQMD, a project would result in a significant GHG related impact if the project would emit more than 1,100 metric tons of Carbon Dioxide equivalent-CO₂e (MTOCO₂e) per year. Operation of a stationary source project would not have a significant GHG impact if the project emits less than 10,000 MTOCO₂e.

Greenhouse Gas Emissions (a) and (b) Less-than-Significant Impact: The Proposed Project is in the NCCAB, where air quality is regulated by MBARD. As discussed above, if a project emits less than 1,100 MTOCO₂e per year during construction, its GHG emissions impact would be less than significant. Temporary construction-related emissions would result from construction equipment and machinery use, which would be limited in nature. The Proposed Project includes demolition of 11,644 sf of existing structures and construction of 74,380 sf of development for a total impact area of 86,024 sf. This impact area is relatively small and would not result in emissions greater than 1,100 MTOCO₂e per year during construction. Operation of the Proposed Project would be consistent with ongoing operations of the Carmel Valley Manor facility and would not generate substantial GHG emissions approaching or exceeding the annual threshold of 10,000 MTOCO₂e. Therefore, the Proposed Project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. The Proposed Project would have a less-than-significant impact related to GHG emissions.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (sources: 3, 10, 13, 37)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (sources: 10, 12, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (sources: 10, 13, 35)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Hazardous materials, as defined by the CCR, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed of, or otherwise managed. Hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. Hazardous materials and waste can result in public health hazards if improperly handled, released into the soil or groundwater, or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer.

The Hazardous Waste and Substances Site (“Cortese”) List is a planning tool used by the state, local agencies, and developers to comply with CEQA requirements related to the disclosure of information about the location of hazardous materials release sites. California Government Code Section 65962.5 requires the California EPA (CalEPA) to develop, at least annually, an updated Cortese List. Various state and local government agencies track and document hazardous materials and release information for the Cortese List. According to the California Department of Toxic Substances Control’s (“DTSC”) *EnviroStor* database, there are no contaminated sites within the vicinity of the Project. The SWRCB’s *GeoTracker* database identifies an old Leaking Underground Storage Tank (LUST) cleanup site on the subject property. However, the SWRCB has documented the cleanup and closure of this hazardous materials site in 2007; therefore, this hazardous materials site is no longer active (SWRCB, 2025).

Hazards and Hazardous Materials Impacts (a-b) Less-than-Significant Impact: The Proposed Project does not include any new site improvements or new development that would require the routine transport, use, or disposal of hazardous materials or the accidental release of

hazardous materials into the environment. The Proposed Project would use potentially hazardous materials such as fuels, lubricants, and solvents during project construction. However, the transport, use, and storage of hazardous materials during construction would occur in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and CCR Title 22.

Existing operation of the Carmel Valley Manor facility requires the use of limited quantities of hazardous materials for routine activities such as cleaning and maintenance as well as activities such as food preparation and transporting materials to and from the site. Operations under the Proposed Project would be consistent with the existing operation of the facility. Hazardous materials would continue to be handled and (if needed) stored in compliance with all local, state, and federal regulations pertaining to hazardous materials, consistent with existing operation of the site. The Proposed Project would result in a less-than-significant impact related to the routine use, transport, or disposal of hazardous materials or the accidental release of hazardous materials into the environment.

Hazard and Hazardous Materials Impact (c) Less-than-Significant Impact: The Project site is within the Carmel Unified School District, and the nearest school is the Carmelo Pre-School Child Development Center, which is located approximately 500 feet away from the Carmel Valley Manor facility across Carmel Valley Road. However, as discussed above, operation of the Proposed Project would not create a significant hazard to the public or the environment. Because the Project would not create a significant hazard to the public or the environment, impacts to schools would be less-than-significant.

Hazard and Hazardous Materials Impact (d) Less-than-Significant Impact: The Project is not located on an active hazardous materials site as defined and compiled pursuant to Government Code Section 65962.5 (California DTSC, 2025). The Project site was formerly a LUST cleanup site; however, the SWRCB's *GeoTracker* database designates this former hazardous materials site as "completed – case closed as of 11/16/2007" following remediation (SWRCB, 2025). Therefore, the Proposed Project would have a less-than-significant impact on the public and/or the environment as the Project is not located on or near an active hazardous material site.

Hazard and Hazardous Materials Impact (e) No Impact: The Proposed Project is not located within an airport land use plan or within two (2) miles of an airport. The nearest airport to the Project site is the Monterey Regional Airport, located approximately 3.5 miles northwest. Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area and no impact would occur.

Hazard and Hazardous Materials Impact (f) Less-than-Significant Impact: The Proposed Project is located within the Carmel Valley Evacuation Region - Evacuation Zone D, which has identified evacuation routes of Carmel Valley Road and Highway 1 (County, 2022). Project construction would be limited to the Carmel Valley Manor facility and would not result in lane

closures on Carmel Valley Road or other obstructions of emergency access or evacuation routes during construction or operation. Therefore, the Proposed Project would not create new obstructions to an adopted emergency response plan or emergency evacuation plan. In addition, the Proposed Project would not result in inadequate emergency access as the Project plans are subject to review and approval by Monterey County Regional Fire Protection District during the permit process. Therefore, the Proposed Project would have a less-than-significant impact regarding an adopted emergency response or evacuation plan.

Hazard and Hazardous Materials Impact (g) Less-than-Significant Impact: As discussed further in **Section IV.20, Wildfire**, the Proposed Project site is not located within a Local Responsibility Area (LRA). The Proposed Project is located within a State Responsibility Area (SRA) that is designated as a Very High Fire Hazard Severity Zone (FHSZ) (County, 2025). However, the Proposed Project would not change the existing use of the Carmel Valley Manor facility. Additionally, construction and operation of the Proposed Project could involve the use of flammable materials, tools, and equipment capable of generating a spark and igniting a wildfire. Additionally, vehicle traffic and human presence in the project area could result in the potential for wildfire ignitions. Under state regulations, areas within Very High FHSZ must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life within these areas. To minimize risk of wildfire the Project would incorporate requirements from the CBC and applicable state regulations such as PRC Section 4291, which requires installation and maintenance of defensible space areas within 100 feet of all structures. Project construction activities would occur in compliance with local building code and fire code standards. Therefore, the Proposed Project would have a less-than-significant impact on the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires.

10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (sources: 10, 13, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (sources: 10, 13, 15, 24, 26, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) result in substantial erosion or siltation on- or off-site? (sources: 10, 13, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite? (sources: 10, 13, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (sources: 10, 13, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows? (sources: 10, 13, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (sources: 10, 13, 29)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (sources: 10, 13, 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

A Preliminary Drainage Report for the Carmel Valley Manor Master Plan (Whitson Engineers, 2025) evaluated existing drainage conditions, identified potential stormwater runoff changes associated with the Proposed Project, and recommended design measures to ensure compliance with County stormwater management requirements.

The MCSS identifies four (4) soil groups on-site: Santa Ynez fine sandy loam (mapping symbol ShE) is the predominant soil group, occurring within the northerly two-thirds of the site; Lockwood shaly loam (mapping symbol LeC) occurs in the southeastern portion of the site; and Xerorthents (mapping symbol Xd) occurs in the southern half of the site, stretching across the entire site longitudinally. The fourth soil group is Pico fine sandy loam (mapping symbol Pf), occurring in the southeastern corner of the Project site but not within the proposed areas of improvements.

The Proposed Project site encompasses approximately 22.7 acres within FEMA Flood Zone X (minimal flood hazard). The Project would demolish approximately 11,644 sf of existing structures and construct approximately 74,380 sf of new improvements, resulting in a net increase of roughly 62,736 sf of structural area. All grading (approximately 6,000 cubic yards of

cut and fill) will be balanced on-site. The site's drainage system directs runoff to a culvert beneath Carmel Valley Road, discharging to the Carmel River.

Hydrology and Water Quality Impact (a) Less-than-Significant Impact: Construction and operation of the Proposed Project would not violate water quality standards or waste discharge requirements. The Proposed Project would connect to CAWD for wastewater treatment. All construction activities would comply with the SWRCB Construction General Permit (Order 2009-0009-DWQ) and implement BMPs to control erosion, sediment, and pollutants. The Project must also comply with Monterey County Code Section 16.14.140, requiring control of pollutants to the maximum extent practicable and elimination of non-stormwater discharges. Therefore, impacts would be less-than-significant.

Hydrology and Water Quality Impact (b) Less-than-Significant Impact: The Project would not substantially decrease groundwater supplies or interfere with recharge. CalAm provides water service to the site. Additionally, the Project does not propose groundwater extraction. Geotechnical borings up to 49 feet deep encountered no groundwater. The Project increases impervious pavement and buildings over the 22.7-acre site and adds approximately 62,736 net structural sf; however, the majority of the site is already developed, and the incremental reduction in infiltration would be minimal. Thus, impacts from interference with groundwater recharge would be less-than-significant.

Hydrology and Water Quality Impact (c) Less-than-Significant Impact: The existing Carmel Valley Manor campus includes drainage inlets and catch basins that convey runoff to an existing culvert beneath Carmel Valley Road. The Project would not alter the natural course of any stream or river. Each construction phase disturbing more than one (1) acre would comply with post-construction stormwater management requirements under the Construction General Permit. Detention and stormwater controls would limit post-project runoff to pre-Project rates for the 2-, 5-, 10-, 25-, 50-, and 100-year, 24-hour design storms. Implementation of BMPs and stormwater facilities would ensure no substantial erosion, flooding, or drainage capacity impacts occur. Therefore, impacts would be less-than-significant.

Hydrology and Water Quality Impact (d) No Impact: The Project site lies in FEMA Flood Zone X (unshaded), indicating minimal flood risk. The site is inland, outside of tsunami and seiche hazard zones, and is not adjacent to significant water bodies. Accordingly, there is no risk of pollutant release due to inundation, and no impact would occur.

Hydrology and Water Quality Impact (e) Less-than-Significant Impact: The Project would not conflict with implementation of any applicable water quality control plan or sustainable groundwater management plan. The site lies within the Carmel Valley Alluvial Groundwater Basin, managed by the Monterey Peninsula Water Management District (MPWMD). Because the basin is not subject to Sustainable Groundwater Management Act (SGMA) requirements and the Project does not include groundwater extraction, it would not interfere with regional water management objectives. The MPWMD has confirmed that water rights are available to supply the Proposed Project. Therefore, impacts would be less-than-significant.

11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community? (sources: 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (sources: 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

The Proposed Project is within the planning area governed by both the 2010 Monterey County General Plan and the CVMP (County, 2013). The approximately 22.15-acre property is developed with the existing Carmel Valley Manor continuing care retirement community, which includes residential units (duplex/triplex) and apartments, assisted living and health care facilities, and shared amenities.

The property carries a County General Plan land use designation of Low Density Residential (LDR) and a zoning designation of LDR/2.5-D-S-RAZ (Low Density Residential, 2.5-acre minimum, Design Control, Site Plan Review, Residential Allocation Zoning District). The continuing care facility operates under Use Permit #624, approved in 1960, which established the use on the site.

Surrounding uses include single-family residences and the Mid Carmel Valley Fire Station to the west. Residential-agricultural land uses border the subject property to the east, and to the north is open space. The property slopes upward from Carmel Valley Road toward the north and is partially visible from the public roadway corridor.

Land Use and Planning Impact (a) No Impact: The Project would occur entirely within the existing Carmel Valley Manor and consists of replacing and expanding existing buildings and facilities. Therefore, the Proposed Project would not physically divide an established community, and no impact would occur.

Land Use and Planning Impact (b) Less-than-Significant Impact: The Project is subject to the Monterey County General Plan, and the CVMP. The General Plan designation (LDR) and existing zoning (LDR/2.5-D-S-RAZ) (Low Density Residential, 2.5-acre minimum) allows residential and compatible institutional uses such as convalescent or continuing care facilities when consistent with zoning and use permit provisions. The Project would be evaluated under the Design Review (D) Site Plan Review (S) to address consistency with the CVMP's land use,

visual, and resource protection policies, as well as the Residential Allocation Zoning District (RAZ) requirements.

The Project site is a developed campus that serves Carmel Valley Manor residents and their guests. The Proposed Project represents a modernization and limited expansion of an existing permitted continuing care community. The site currently has 146 independent living units (duplex/triplex & apartment), A Health Center with 24 “assisted living” beds and 36 “skilled nursing” beds, and 7 visitor quarters. Project improvements include 19 new independent living units, a net gain of 1 guest unit (8 total), a 12-bed memory care facility, and additions to the fitness center and meeting house. The Project would construct some of the new guest units on the southern hillside portion of the property near Carmel Valley Road. The Project also proposes development on slopes that exceed 25% and removal of approximately 57 protected coast live oaks to accommodate new buildings and site grading.

General Plan: The Project complies with the Land Use Element of the 2010 General Plan. The Key Policies from Land Use Element that relate to the proposed Project are Policy LU-1.9 (Infill development shall be compatible with surrounding land use and development), and Policy LU-1.13 (all exterior lighting shall be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced of the lighting source, and off-site glare is fully controlled). The Project represents the modernization and expansion of an existing senior residential campus that has operated in this location since the early 1960s. All new facilities – including residential units, guest units, and a memory care building – are located within or immediately adjacent to previously developed areas of the campus, maintaining a compact footprint and minimizing new site disturbance. The Project’s design, building scale, and materials are consistent with the existing campus and compatible with the surrounding low-density residential and institutional uses. Project plans include low-profile, downlit, and shielded lighting fixtures designed to minimize glare and long-range visibility. Compliance with the County’s standard condition of approval for an Exterior Lighting Plan would ensure compliance with the County’s lighting standards.

Carmel Valley Master Plan. Generally, CVMP policies encourage protection of visual resources, and maintenance of the valley’s rural character. CVMP Policies CV-1.1 and CV-1.20 require development to preserve Carmel Valley’s rural character through rural architectural design review and visual compatibility, including siting of development to minimize disruption of views and landforms. In addition, Policies CV-3.3 and CV-3.4 require protection of public views from Carmel Valley Road and minimization of hillside/landform alteration through sensitive siting and design. Overall, CVMP policies are intended to preserve scenic views of the valley hillsides and maintain the rural visual character of the corridor.

The Project proposes new residential units, guest units, and a memory care building on an existing developed hillside above Carmel Valley Road. Although construction would occur on partially-visible slopes, the site is largely screened from the roadway by an established tree canopy and mature vegetation that would remain in place along the lower slopes and adjacent to Carmel Valley Road. The April 2025 Pre-Construction Tree Impact Assessment confirms that

tree removal would primarily affect interior portions of the hillside rather than the roadside canopy bordering Carmel Valley Road. Approximately 57 protected coast live oaks would be removed, primarily in areas required to accommodate structures, driveways, and safety clearances. Replanting of native oaks and landscape restoration are incorporated into the Project’s final landscaping plan. The landscaping plan submitted April 18, 2025, includes planting of native and drought-tolerant species within disturbed areas and new hillside gardens that visually integrate the new development with the existing natural setting. Additionally, with the implementation of **Mitigation Measure BIO-1: Tree Protection and Replacement Plan**, the Project would be required to mitigate for the removal of the existing oak trees on-site and plant them in a strategic location to minimize views of the Project from Carmel Valley Road. The Project also maintains a 100-foot setback from Carmel Valley Road in compliance with CVMP Policy CV-3.1.

While limited portions of new construction may be intermittently visible from Carmel Valley Road, the Project’s combination of retained canopy trees, new landscaping, and architectural design consistent with existing buildings would substantially minimize visibility and preserve the scenic quality of the corridor. The County’s standard condition of approval for Design Approval would ensure compliance with all applicable visual and land use policies prior to building permit issuance. Overall, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effects. The Project site is a developed campus that serves Carmel Valley Manor residents and their guests. The Project site is located on a disturbed and developed site at the existing Carmel Valley Manor facility. Upon implementation, the Project site would continue the existing land use in a manner compatible with surrounding development and consistent with the intent of the General Plan and CVMP. Accordingly, the Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and the impact would be less-than-significant.

12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

Please refer to **Section IV.A**, Environmental Factors Potentially Affected. The Proposed Project would have no impact on mineral resources.

13. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (sources: 10, 13, 30, 39)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels? (sources: 10, 13, 30, 39)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (sources: 10, 13, 30, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

Noise is commonly defined as unwanted sound. Sound levels are usually measured and expressed in decibels (“dB”) with zero (0) dB corresponding roughly to the threshold of hearing. Most sounds consist of a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Most environmental noise includes a conglomeration of noise from distant sources, which creates a relatively steady background noise in which no particular source is identifiable.

The surrounding area is characterized by low-intensity residential and institutional uses within the CVMP area. The nearest sensitive receptors include Carmelo Pre-School Child Development Center to the south and residences on Los Arboles Drive to the west. Additional sensitive receptors include existing Carmel Valley Manor residents located within 50-100 feet of new construction zones. Existing ambient daytime noise levels along Carmel Valley Road are estimated at 55–60 dBA equivalent continuous sound level (“Leq”) at 50 feet from the roadway edge, based on measurements from comparable County IS/MNDs. Background levels drop to the mid-40s dBA Leq within the interior of the Carmel Valley Manor property.

The Project is subject to the Monterey County General Plan Noise Element and County Code Section 10.60 (Noise Control Ordinance). Applicable standards include:

- Exterior noise standard for residential uses: 65 dBA Community Equivalent Sound Level (“CNEL”).
- Interior noise standard: 45 dBA CNEL for habitable rooms.
- Construction hours: 7:00 a.m. to 7:00 p.m. Monday–Saturday; no construction Sundays or holidays.
- Temporary construction noise threshold: 80 dBA Leq at residential property lines (typical County CEQA threshold for significance).

Noise generated by the Project would primarily occur during construction activities. See **Table 5** for a summary of typical construction equipment noise levels. Post-construction operational noise would be consistent with existing uses and limited to typical residential and community activity.

Table 5. Typical Construction Equipment Noise Levels (dBA Leq) by Distance

Equipment Type	At 50 feet	At 100 feet	At 200 feet	At 400 feet
Bulldozer	85	79	73	67
Loader/Backhoe	80	74	68	62
Excavator	85	79	73	67
Concrete Mixer Truck	82	76	70	64
Compactor/Roller	85	79	73	67
Crane/Material Lift	81	75	69	63
Generator/Air Compressor	78	72	66	60
Dump Truck	84	78	72	66
Hand Tools/Saws	75	69	63	57

Source: Federal Highway Administration (“FHWA”) 2018. Noise Measurement Handbook – Final Report. June 1. <https://www.fhwa.dot.gov/ENVIRonment/noise/measurement/handbook.cfm>.

Based on the site plan, construction near Carmelo Pre-School Child Development Center (~400 feet) could intermittently reach 65-70 dBA Leq during heavy grading or demolition. These levels would be temporary and confined to 7am to 7pm Mon-Sat.

Noise Impacts (a) and (b) Less-than-Significant Impact with Mitigation: Temporary noise from construction could result in short-term increases above existing ambient levels, particularly at nearby residences on Los Arboles Drive and Carmelo Pre-School Child Development Center. These temporary effects would be limited to daytime hours and associated primarily with demolition, grading, and heavy equipment operations. Operational noise sources, such as traffic, mechanical systems, and landscape maintenance, would be similar to existing conditions and well below the 65 dBA CNEL exterior standard at the property boundary.

Although temporary construction noise could exceed 80 dBA Leq at times near sensitive receptors, such increases would be short-term and can be minimized through implementation of standard construction noise controls. With implementation of **Mitigation Measure N-1**,

temporary noise impacts would be reduced to less-than-significant levels. Long-term operational noise increases would not exceed applicable County standards.

After project completion, noise generation would be limited to vehicle trips, HVAC units, and landscape maintenance, comparable to existing activity levels. The facility would continue to operate as a residential care campus with low-intensity, non-commercial use. Traffic noise emanating from Carmel Valley Road would continue to dominate the local acoustic environment, and overall operational noise levels are expected to remain below 65 dBA CNEL at property boundaries.

Mitigation Measure N-1 (Construction Noise Control Measures):

The applicant and construction contractor shall be responsible for implementing the following mitigation measure requirements to ensure impacts related to construction noise remain less than significant. The requirements of the mitigation shall be included as notes on the construction plans and submitted to the County of Monterey HCD for review and approval prior to the issuance of grading or building permits.

1. Construction activities shall be limited to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday. No work shall occur on Sundays or holidays.
2. All construction equipment shall be properly maintained and fitted with manufacturer-recommended mufflers.
3. Construction equipment shall be located as far as feasible from adjacent sensitive receptors and shielded by temporary barriers such as acoustic blankets/quilts, modular soundproof walls or similar acoustic enclosures.
4. Idling of construction equipment for more than five (5) minutes shall be prohibited.
5. The construction contractor shall designate a Noise Disturbance Coordinator to respond to complaints within 24 hours.
6. High-noise activities near Carmelo Pre-School Child Development Center should, where feasible, be scheduled outside of regular school hours.

Construction of the Carmel Valley Manor Master Plan Project would result in temporary increases in noise at adjacent sensitive receptors, including Carmelo Pre-School Child Development Center and residences on Los Arboles Drive. With implementation of **Mitigation Measure N-1**, these temporary impacts would be reduced to less-than-significant levels.

Operational noise would remain consistent with the site's current residential and institutional use and within applicable Monterey County General Plan Noise Element standards. Accordingly, the Project would not expose nearby sensitive receptors to excessive noise or vibration and would not result in a significant impact under CEQA.

Noise Impact (c) No Impact: The nearest airport to the Project site is the Monterey Regional Airport, located approximately 3.5 miles to the northwest. The site is not within two (2) miles of

a public airport or public use airport or within an airport land use plan. Therefore, there would be no impact regarding excessive noise from a local airport.

14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (sources: 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (sources: 10, 13, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

Population and Housing Impact (a) Less-than-Significant Impact: The Proposed Project would not induce substantial unplanned population growth in the Carmel Valley area. The Project involves redevelopment and modernization of an existing senior living campus that has operated on the site since 1963. It would demolish several older residential units and ancillary structures and replace them with 19 new independent living units, eight (8) guest units, and a 12-bed memory care facility, resulting in a slight net increase in on-site housing units within the already developed campus footprint. Specifically, the site currently accommodates 146 independent-living residential units and upon completion of the project, would accommodate 163 independent-living residential units (net increase of 17 units).

All new residential units would be restricted to seniors according to the facility’s continuing care retirement community license and operational model, consistent with regulation by the California Department of Social Services. Residency is open to qualifying seniors who meet the facility’s age and care requirements but does not constitute general market housing available to the broader public. Accordingly, the Project would not introduce new family or workforce housing, nor would it create new employment centers likely to generate indirect population growth.

Infrastructure improvements such as the recent connection to CAWD system and continued service by CalAm represent modernization of existing utilities rather than extension of new service capacity into undeveloped areas. The Project does not extend roads, water, or sewer infrastructure in a way that would facilitate off-site development.

Because the Project maintains an existing licensed residential care use, limits occupancy to qualifying seniors, and does not expand urban services or employment opportunities, it would

not induce direct or indirect population growth. Therefore, impacts related to unplanned population growth would be less-than-significant.

Population and Housing Impact (b) No Impact: The Carmel Valley Manor senior residential community currently occupies the Project site. All residents currently occupying residential units to be demolished and/or replaced would be accommodated within other available units on-site or within newly constructed replacement units as part of the campus modernization plan.

No off-site residences would be removed or displaced, and no residents would require relocation outside of the existing facility. The Project would therefore not displace a substantial number of people or housing, nor would it necessitate the construction of replacement housing elsewhere. Accordingly, the Project would have no impact related to displacement of people or housing.

15. PUBLIC SERVICES

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection? (sources: 10, 13, 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection? (sources: 10, 13, 20)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools? (sources: 6, 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Public Services Impact (a) Less-than-Significant Impact: Fire protection services for the Project site are under the authority of the Monterey County Regional Fire District serviced out of the Mid Carmel Valley Station. The Proposed Project would increase the buildings and population within the Carmel Valley Manor, which could incrementally increase demand for fire protection services compared to existing conditions. However, the Mid Valley Station (#5), is located at 8455 Carmel Valley Rd, directly adjacent to the Project site. There would be no increase in fire response time as a result of the Proposed Project and existing fire protection

facilities would accommodate services for the Proposed Project. The Proposed Project includes renovations and additions to an existing senior community and includes the construction of 19 independent living units, 8 guest units, and a 12-bed memory care facility. The Proposed Project would not require the renovation of existing facilities or construction of new fire protection facilities. The Proposed Project would have a less-than-significant impact on fire protection.

Public Services Impact (b) Less-than-Significant Impact: The Monterey County Sheriff's Office provides police services to the Project site. The Proposed Project is an amendment to an existing use permit and the increase in residents at the Project site would result in an incrementally increased chance of the need for police services compared to existing conditions. However, the Monterey County Sheriff's Office already serves the Project site and existing police facilities would accommodate the potential increase in police response required as a result of the Proposed Project. The Proposed Project would not require the renovation of existing facilities or construction of new police facilities. The Proposed Project would have a less-than-significant impact on police protection.

Public Services Impact (c) No Impact: The Proposed Project for the minor expansion to an existing senior residential community and as such, does not accommodate school aged children or any new residential development that would increase burdens on existing educational facilities or require the construction of new educational facilities. The Proposed Project would have no impact on educational facilities.

Public Services Impact (d) No Impact: The Proposed Project is for the minor expansion to an existing senior community that is already served by recreational uses on-site. The incremental increase of residents would not increase burdens on existing recreational facilities or require the construction of new recreational facilities. The Proposed Project would have no impact on recreational facilities.

Public Services Impact (e) Less-than-Significant Impact: Operations under the Proposed Project would be consistent with the existing site use and would not increase demands on other off-site public facilities. The Proposed Project would have a less-than-significant impact on other public facilities.

16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (sources: 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

The Monterey Regional Park District and Parks Division of the County's Public Works Department manage most public park facilities in inland unincorporated Monterey County.

Recreation Impact (a) Less-than-Significant Impact: The Proposed Project would add facilities and residential units to the existing senior residential community of Carmel Valley Manor. The Proposed Project would not generate increased demand on existing off-site neighborhood and regional parks that would result in the increased deterioration of existing facilities (also refer to **Section VI.15, Public Services**). The Proposed Project would have a less-than-significant impact related to the deterioration of public facilities.

Recreation Impact (b) No Impact: The Proposed Project would not include the construction of new or expanded recreational facilities that would have an adverse physical effect on the environment. No impact to recreational facilities would occur because of the Proposed Project.

17. TRANSPORTATION/TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? (sources: 10, 13, 31, 32, 39)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (sources: 10, 13, 14, 31, 32)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (sources: 10, 13, 31, 32, 39)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access? (sources: 10, 12, 13, 31, 32, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Carmel Valley Road (County Route G16) is a two (2)-lane rural arterial that provides east–west access through Carmel Valley. The segment in the Project area carries approximately 9,000–10,000 vehicles per day under existing conditions. The road has limited shoulders and no dedicated sidewalks or bicycle lanes.

The Carmel Valley Manor campus is primarily accessed by a main driveway on Carmel Valley Road, directly opposite Carmelo Pre-School Child Development Center, which accommodates nearly all daily resident, visitor, and staff traffic. Los Arboles Drive is a narrow, rural local road that serves a small residential neighborhood, and which connects to Carmel Valley Road and also connects to the northwestern corner of Carmel Valley Manor through a one-lane driveway.

Monterey–Salinas Transit (“MST”) Route 24 provides public transit service in the area, traveling along Carmel Valley Road with stops located within approximately 0.2 mile east of the site. Although transit service is limited, access to Route 24 provides a connection to the cities of Carmel and Monterey. Internal walkways within the campus provide pedestrian access to parking areas and local transit stops.

Two (2) transportation studies were prepared for the Carmel Valley Manor Master Plan Project to evaluate potential effects on traffic operations, access, circulation, and roadway safety:

- *Zhou Transportation Group. Carmel Valley Manor Traffic Technical Memorandum. January 8, 2025.*
- *Hexagon Transportation Consultants. Carmel Valley Manor Intersection Operations Analysis. October 13, 2025.*

These studies assessed existing and projected traffic volumes along Carmel Valley Road, vehicle miles traveled (“VMT”), driveway and intersection operations, and emergency access. Field observations included conditions near Carmelo Pre-School Child Development Center, located across from the primary site driveway, and along Los Arboles Drive, a local street connecting to the rear of the property.

Transportation Impact (a) Less-than-Significant Impact with Mitigation: Construction of the Proposed Project would generate short-term traffic associated with the delivery of materials, movement of heavy equipment, and commuting of construction workers. The construction period would last for approximately 18 months, with varying levels of activity depending on the phase of demolition, grading, and building.

The Zhou Transportation Group (Zhou, 2025) and Hexagon Transportation Consultants (Hexagon, 2025) transportation studies estimated that the peak construction period would generate approximately 30–40 daily worker trips and 5–10 heavy truck trips, primarily during the morning and late afternoon commute windows. Construction vehicles would access the site via the main Carmel Valley Road driveway, with internal staging and parking occurring within the existing campus. The Project would not propose lane closures or public roadway construction.

Carmel Valley Road currently carries approximately 9,000 vehicles per day, and the addition of temporary construction trips represents a less than one (1) percent increase in daily traffic. Given the short duration of peak activity, the transportation analysis concluded existing capacity on Carmel Valley Road is sufficient to accommodate these additional vehicles without causing degradation in traffic operations.

The Circulation Element of the 2010 County General Plan provides policy direction for the transportation system serving unincorporated County lands and describes how the County intends to serve the transportation needs as the population grows. Specific impact criteria have been applied to study intersections and road segments to determine if the project-specific increases in traffic is substantial in relation to the existing traffic load and capacity of the street system. The fee programs that have been established by the County for these policies are the Regional Development Impact Fee (“RDIF”) pursuant to County Code Section 12.90 and the CVMP Area Traffic Mitigation fee pursuant to County Code Section 18.60. The Proposed Project will be conditioned to pay both fees as identified below:

Carmel Valley Development Impact Fee: The Applicant shall pay the CVMP Area Traffic Mitigation fee pursuant to the Board of Supervisors Resolution NO. 95-410, adopted September 12, 1995 (Fees are updated annually based on CCI). The fee shall be based on the project’s estimated average daily trip generation multiplied by the fee per trip for a single family dwelling (residential unit).

Regional Development Impact Fee: Prior to issuance of building permits, applicant shall pay the RDIF pursuant to County Code Section 12.90. The fee amount shall be determined based on the parameters adopted in the current fee schedule.

As reported in the transportation studies conducted for the Proposed Project, construction equipment would remain on-site, and the Project would schedule truck movements to avoid school drop-off and pick-up periods at Carmelo Pre-School Child Development Center, located across from the main driveway. All hauling routes and work hours would comply with Monterey County Department of Public Works requirements, and the Proposed Project would implement a Construction Management Plan (“CMP”) to maintain safe access and visibility along Carmel Valley Road.

Construction traffic would be temporary and would not result in a substantial increase in traffic. However, there is potential for circulation conflicts or hazards near Carmelo Pre-School Child Development Center during construction. Typical construction management standards and limitations on routes, access and hours of construction identified below would be further refined by the review and approval of the Final CMP by County Public Works prior to initiation of construction. Mitigation below identifies requirements for adherence to construction hour limits outside of primary hours for school pick-up and drop-off, as well as limitation for hauling routes and prohibition of worker vehicles on Los Arboles. Other requirements include restrictions on working hours to reduce potential conflicts with traffic entering and exiting Carmelo Pre-School Child Development Center during peak school hours. With implementation of the following mitigation and standard CMP construction requirements as required by the County, impacts from construction-related transportation would be reduced to less-than-significant.

Mitigation Measure TR-1 (Minimization of Traffic Impacts During Construction)

The applicant shall prepare and submit a Construction Management Plan (“CMP”) to HCD-Planning and HCD-Engineering Services for review and approval prior to issuance of the Grading Permit or Building Permit. The CMP shall include measures to minimize traffic impacts during the construction/grading phase of the project, including limiting hours of construction traffic outside Carmelo Pre-School Child Development Center pick up and drop off times and a restriction of construction traffic on Los Arboles Drive.

The CMP shall include, at a minimum, duration of the construction, hours of operation, truck routes that restrict the use of Los Arboles Drive, estimated number of truck trips that will be generated, number of construction workers, and on-site/ off-site parking areas for equipment and workers and locations of truck staging areas. Other requirements shall include:

- Construction vehicles must enter and exit Carmel Valley Manor Road. Use of Los Arboles to enter and exit job site is prohibited.
- Truck trips are prohibited during peak hours.

Approved measures included in the CMP shall be implemented by the applicant during the construction/grading phase of the project.

During operation, the Proposed Project would incrementally increase traffic volumes associated with residents, staff, and visitors. The Zhou study indicates: 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.

The Project's traffic operational generation is estimated to be low because the Carmel Valley Manor functions as a continuing-care retirement community, where residents are predominantly seniors who no longer commute daily and who rely on on-site amenities and coordinated transportation. Most daily needs—such as meals, medical services, recreation, and deliveries—are met within the facility, reducing resident travel. In addition, the campus provides scheduled shuttle service, staff carpooling options, and visitor management policies that limit individual vehicle use. As a result, staff and service providers account for most trips rather than residents, and overall vehicle activity is significantly lower than that of conventional residential developments of similar size.

All intersections would continue to operate at levels of service (“LOS”) consistent with the Monterey County General Plan rural standard (LOS D or better). The minimal increase in vehicle trips would not exceed County or regional thresholds for roadway capacity.

The Project does not alter or remove any existing bicycle, pedestrian, or transit facilities. Sidewalks are not present along Carmel Valley Road, but internal walkways provide safe circulation within the campus and to nearby bus stops. Therefore, the Project would not conflict with applicable circulation or transportation system plans.

Transportation Impact (b) Less-than-Significant Impact: Effective July 2020, Senate Bill (“SB”) 743 has required CEQA projects to evaluate traffic impacts using VMT. Specifically, CEQA Guidelines Section 15064.3, subdivision (b)(1) calls for the evaluation of transportation impacts of projects based on VMT. The publication *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Governor's Office of Land Use and Climate Innovation, 2018), suggests that a significant environmental impact would occur if a project would generate more than 110 trips per day.

The Zhou memorandum determined that the Proposed Project's trip generation is below the 110 daily trip threshold identified for “small project” screening under CEQA. Residents of Carmel Valley Manor have limited driving activity, as most services – such as dining, recreation, and medical care – are located on-site. Shuttle services and delivery options further reduce vehicle travel demand. Given the low trip generation, short trip lengths, and on-site amenities, the

Project would result in VMT below regional averages for similar uses in the County. Therefore, the Project would not result in a significant transportation impact related to VMT.

Transportation Impact (c) Less-than-Significant Impact with Mitigation: The Project would maintain the existing driveway locations and would not modify Carmel Valley Road. Field observations by Hexagon confirmed that both driveways provide adequate sight distance consistent with Caltrans Highway Design Manual Table 201.1, which requires 445 feet of stopping sight distance for a 45-mph roadway. The Project's transportation report documents sight distance from the existing driveway at approximately 500 feet.

The main driveway across from Carmelo Pre-School Child Development Center experiences school drop-off and pick-up activity during short time windows in the morning and early afternoon. Based on observed conditions, queueing from the preschool clears within several minutes and project-related traffic would add fewer than two (2) vehicles per peak hour turning movements. Although the Project's traffic reports did not identify significant geometric or safety issues, the Project's vicinity to the Carmelo Pre-School Child Development Center could result in potential conflicts with construction traffic entering and exiting the Project site during peak school hours and peak traffic hours on Carmel Valley Road. With implementation of **Mitigation Measure TR-1**, construction truck trips would be prohibited during peak traffic hours on Carmel Valley Road; therefore, construction-related traffic impacts related to potential road hazards would be reduced to a less-than-significant level.

Transportation Impact (d) Less-than-Significant Impact: The Project includes the following access points: 1) the main driveway on Carmel Valley Road, serving daily traffic; and, 2) a narrow driveway connection to Los Arboles, a narrow local road north of the site.

Los Arboles Drive is a one (1)-lane, rural residential roadway with limited shoulder width, low traffic volumes, and direct connection to Carmel Valley Road. Community members have expressed concern about potential increases in through traffic along this road. Note that the Project does not create new public access nor does it alter existing public access. The internal campus roadway network is looped, allowing emergency vehicles to circulate without dead ends. Driveway grades and widths comply with County Fire Code Section D103.1, ensuring emergency vehicle accessibility. With the maintained access points, the Project provides adequate emergency ingress and egress. Therefore, impacts to emergency access would be less-than-significant.

18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

California Assembly Bill (“AB”) 52, in effect since July 2015, provides CEQA protections for tribal cultural resources. All lead agencies approving projects under CEQA are required, if formally requested by a culturally affiliated California Native American Tribe, to consult with such tribe regarding the potential impact of a project on tribal cultural resources before releasing an environmental document. Under California PRC Section 21074, tribal cultural resources include site features, places, cultural landscapes, sacred places, or objects that are of cultural value to a tribe and that are eligible for or listed on the California Register of Historical Resources (“CRHR”) or a local historic register, or that the lead agency has determined to be of significant tribal cultural value.

The County initiated tribal outreach for the Proposed Project on November 13, 2025, in fulfillment of the requirements of Assembly Bill (“AB”) 52. No requests for consultation were received during the 30-day response window.

Tribal Resources Impact (a) and (b) Less-than-Significant Impact: PRC Section 21074 defines a tribal cultural resource as “sites, features, places, cultural landscapes, sacred places, and

objects with cultural value to a California Native American tribe that are either of the following:
a) included or determined to be eligible for inclusion in the California Register of Historical Resources, [or] b) included in a local register of historical resources as defined in subdivision (k) of [PRC] Section 5020.1” (PRC Section 21027(a)).

There is no evidence that “tribal cultural resources” exist at the project site according to the project-specific archaeological assessments performed.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Source: 7, 8, 9, 10, 13, 33, 34)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (Source: 10, 13, 15, 24, 33, 34)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source: 10, 13, 33, 34)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Source: 5, 7, 8, 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Source: 5, 7, 8, 10, 13)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

The Proposed Project site is currently served by CalAm, a privately held, investor-owned public utility regulated by the California Public Utilities Commission (CPUC). CalAm provides potable water service to the Monterey District, which includes Carmel Valley, the City of Monterey, City of Del Rey Oaks, City of Sand City, City of Seaside, and surrounding unincorporated areas.

CalAm supplies water primarily from the Carmel River, the Seaside Groundwater Basin, and the Pure Water Monterey (“PWM”) Project, a regional advanced water purification and groundwater replenishment program jointly developed by Monterey One Water (“M1W”) and the MPWMD. CalAm maintains the existing water distribution infrastructure serving the Carmel Valley Manor campus, including domestic and service laterals extending from Carmel Valley Road. The Proposed Project would continue to receive water service from CalAm through these existing service connections, with minor on-site upgrades to accommodate new facilities and hydrant spacing consistent with County Fire Code requirements.

The Proposed Project would receive sewer service by way of a recent (2025) connection to CAWD, the local wastewater collection and treatment provider. CAWD provides wastewater collection, treatment, and disposal for approximately 11,000 residents within its service area and treatment and disposal for an additional 4,500 residents in the Del Monte Forest area. CAWD maintains 81 miles of sewer mains within a service area of approximately 5.5 square miles (CAWD, 2020a).

Under the Proposed Project, wastewater generated by the Carmel Valley Manor facility would be conveyed from the site via a new gravity and force main connection to the existing CAWD sewer line within Carmel Valley Road. Flows would then be transported through the existing collection system to CAWD Water Pollution Control Plant, which has a design capacity of 4.0 million gallons per day (“MGD”), a permitted capacity of 3.0 MGD, and an average dry-weather flow of approximately 1.2 MGD (CAWD, 2020b). The plant currently has a remaining permitted capacity of roughly 1.8 MGD, sufficient to accommodate the incremental wastewater flow from the Proposed Project.

The conversion from septic to community sewer service has eliminated an aging and potentially failing on-site wastewater system, which the County Environmental Health Bureau had identified as a health concern. This upgrade has improved wastewater treatment reliability and has reduced potential groundwater contamination risks while maintaining compliance with Regional Water Quality Control Board and County Environmental Health Bureau.

Utilities and Service Systems Impact (a) No Impact: The Proposed Project is an amendment to an existing use permit to expand and modernize the existing facility and would not result in major expansion of on-site or off-site water, stormwater drainage, electric power, natural gas, or telecommunications infrastructure. The Project would continue to be served by existing utility systems as operated by CalAm for potable and fire protection water, PG&E for electrical and natural gas service, and existing telecommunications providers. Minor utility extensions or relocations required to serve new buildings would occur within previously disturbed areas of the developed campus and would not require substantial new utility corridors or infrastructure.

Accordingly, the Project would not result in the construction of new - or expansion of existing - utility facilities that could cause significant environmental effects. No impact related to the relocation or expansion of utility services would occur.

Utilities and Service Systems Impact (b) Less-than-Significant Impact: The Proposed Project would not require construction of new regional water, wastewater treatment, or storm drainage facilities. CalAm, a regulated public utility serving the Monterey Peninsula, provides potable water service to the Carmel Valley Manor property. CalAm obtains water from a combination of Carmel River diversions, the Seaside Groundwater Basin, and MPWSP desalination and aquifer storage sources, and distributes it through existing mains within Carmel Valley Road. The Project would continue to receive potable and fire flow water through CalAm's existing distribution system, with minor on-site line extensions and hydrant upgrades to serve new buildings. These improvements would occur within previously disturbed areas and would not involve significant construction or environmental effects.

Wastewater service would be provided by CAWD. Wastewater would be conveyed through CAWD's collection system to CAWD Water Pollution Control Plant, which has a design capacity of 4.0 MGD, a permitted capacity of 3.0 MGD, and an average dry-weather flow of 1.2 MGD. CAWD's plant remaining permitted capacity of approximately 1.8 MGD is sufficient to accommodate the Project's estimated wastewater generation.

Storm drainage improvements would consist of on-site collection, infiltration, and detention systems designed in accordance with County stormwater management standards and consistent with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. These systems would manage site runoff and would not require off-site storm drainage extensions.

Because all new or upgraded utility improvements would occur on-site or immediately adjacent to disturbed areas and would tie into existing regional systems with sufficient capacity, the Proposed Project would not result in the construction of new or expanded utility facilities that could cause significant environmental effects. Impacts would be less-than-significant.

Utilities and Service Systems Impact (c) No Impact: The Proposed Project would continue to receive water service from CalAm, which operates under the oversight of the CPUC and the SWRCB. The Project represents a modest expansion of the existing Carmel Valley Manor senior residential community and would result in a minor increase in overall water demand, primarily for domestic and landscaping uses.

CalAm's Monterey District draws water from multiple sources, including the Carmel River Basin, the Seaside Groundwater Basin, and the PWM Project. The PWM Project recycles municipal wastewater, stormwater, and agricultural drainage using advanced treatment technologies and injects the purified water into the Seaside Groundwater Basin, creating a drought-resilient potable supply for CalAm's Monterey District. The goal of the PWM Project is to enhance the region's long-term water supply reliability during normal, single-dry, and multiple-dry-year conditions.

In addition, correspondence from the MPWMD confirms that the Carmel Valley Manor Project holds Water Use Permit No. 772, issued July 31, 2018, with a Water Entitlement of 6.00 acre-

feet acquired from Malpas Water Company to serve the proposed improvements. The MPWMD Will Serve Letter (December 17, 2024) states that this quantity of Malpas Water is “more than sufficient to meet the needs of the proposed project.” MPWMD will issue Water Permits for individual Project components as final construction plans are submitted, provided the property remains in compliance with all applicable MPWMD Rules and Water Efficiency Standards. The Malpas Water Entitlement, established by Malpas Water LLC and administered by MPWMD under CPUC authorization, provides CalAm-delivered Carmel River water to qualifying projects within the service area. Confirmation of entitlement and availability from MPWMD demonstrates that sufficient potable water is reserved for the Carmel Valley Manor expansion. The Project site lies within CalAm’s existing service area, and the Proposed Project’s incremental water demand is within the available supply capacity identified in CalAm’s Urban Water Management Plan (2020) and recent CPUC filings. The Proposed Project would not require new water rights or system expansion.

Accordingly, adequate water supplies are available to meet the Proposed Project’s needs during normal, dry, and multiple dry years without creating the need for new entitlements or facilities. Impacts would be less-than-significant.

Utilities and Service Systems Impacts (d) and (e) Less-than-Significant Impact: The County is served by two (2) active solid waste landfills: the Johnson Canyon Sanitary Landfill, located at 31400 Johnson Canyon Road in Gonzales, and the Monterey Peninsula Landfill, located at 14201 Del Monte Boulevard in Marina. Both facilities may serve the Proposed Project.

ReGen Monterey (formerly Waste Management) would continue to provide solid waste collection and recycling services for Carmel Valley Manor and would transport and dispose of solid waste generated during Project operation at the Monterey Peninsula Landfill and Recycling Facility north of the City of Marina. This landfill has a permitted capacity of 3,500 tons per day and currently receives approximately 1,100 tons per day. The facility’s remaining capacity is approximately 48 million tons (72 million CY). At current disposal rates, the California Department of Resources Recycling and Recovery (“CalRecycle”) projects the landfill to continue serving the region for approximately 150 years (CalRecycle 2025a). The Johnson Canyon Sanitary Landfill has an estimated six (6) million CY of remaining capacity, sufficient to accommodate regional solid waste disposal needs through approximately 2055.

Demolition and construction associated with the Proposed Project would generate solid waste, including building debris and soils. The Project applicant would be required to recycle or salvage non-hazardous construction and demolition debris in accordance with the California Green Building Standards Code (CALGreen, Section 5.408) and County Code Section 10.40 (Construction and Demolition Debris Recycling Ordinance), which mandate at least a 65-percent diversion rate through reuse or recycling of qualifying materials.

Operation of the Carmel Valley Manor facility following redevelopment would not substantially increase the amount of solid waste generated on-site compared to existing conditions. Solid

waste would continue to be collected and disposed of through existing regional infrastructure with sufficient permitted capacity.

Therefore, the Proposed Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure. Nor would the Project impair attainment of applicable solid waste reduction goals or conflict with federal, state, or local solid waste management regulations. Impacts would be less-than-significant.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (sources: 10, 12, 13, 35, 36, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (sources: 10, 13, 35, 36)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (sources: 10, 13, 35)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes(sources: 10, 13, 35, 36, 39)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

The Proposed Project site is located within a California Department of Forestry and Fire Protection (“CAL FIRE”) SRA. CAL FIRE designates the Project site as a “Very High” Fire Hazard Severity Zone (FHSZ) (CAL FIRE, 2023).

Wildfire Impact (a) Less-than-Significant Impact: The Monterey County Emergency Operations Plan contains evacuation routes, and response and recovery protocols. The Proposed Project is located within the Carmel Valley Evacuation Region, Evacuation Zone D which has

identified evacuation routes of Carmel Valley Road and Highway 1 (County, 2022). The Proposed Project would not impair evacuation procedures along Carmel Valley Road. While the Project proposes additional residential units and buildings, these additions would not impair emergency access or evacuation routes. The Project would comply with the building code and fire safety requirements. Based on this information, the Proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and would result in a less-than-significant impact to emergency response emergency evacuation plans.

Wildfire Impact (b) Less-than-Significant Impact: The Proposed Project would not substantially increase the total amount of residential units within the existing Carmel Valley Manor senior living community. The site is located on a developed hillside adjacent to the Mid-Carmel Valley Fire Protection District Station, which provides direct and immediate emergency response. Portions of the site are on sloping terrain; however, the proposed improvements would occur primarily within previously disturbed or landscaped areas and would not expand development into new, undisturbed wildland areas.

The Project proposes to remove approximately 57 coast live oak trees. The Project arborist's recommendations of a 1:2 replacement ratio for removed trees is intended to reduce on-site fuel load and improve defensible space conditions around structures. The Project design and ongoing facility management must continue to comply with County fire safety standards, including defensible space maintenance, access, and emergency water supply requirements.

Given the site's existing development, maintained landscaping, proximity to emergency services, and compliance with current fire protection regulations, the Project would not exacerbate wildfire risks or expose future residents to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, impacts would be less-than-significant.

Wildfire Impact (c) Less-than-Significant Impact: The Proposed Project would not include new or expanded public roadways, fuel breaks, or emergency water storage that could exacerbate wildfire risk. Project improvements would occur within the boundaries of the existing Carmel Valley Manor campus, which is an established residential care community with existing infrastructure and internal circulation. The Project would connect to existing utilities, including water, wastewater, and electrical systems. New utility extensions would consist of short connections within developed areas and would not introduce new above-ground power lines or other facilities that could increase ignition potential. Construction activities would comply with County fire safety and construction regulations, including maintaining emergency vehicle access and implementing standard fire prevention measures during grading and building operations. The site's proximity to the Mid-Carmel Valley Fire Protection District Station, located immediately adjacent to the Project, further reduces potential fire response delays. Therefore, the Project would not exacerbate wildfire risk or result in environmental impacts related to new fire-prone infrastructure. Impacts would be less-than-significant.

Wildfire Impact (d) Less-than-Significant Impact: The Project site is located within a CAL FIRE SRA designated Very High FHSZ. The Carmel Valley Manor campus, however, is an

existing, developed senior living community with established infrastructure, internal access roads, and managed landscaping. The site is located immediately adjacent to the Mid-Carmel Valley Fire Protection District Station, providing direct emergency response capability.

All proposed new buildings and improvements would be constructed in accordance with the latest CBC and Fire Code requirements applicable to Very High FHSZs, which include ignition-resistant materials, ember protection features, and on-site defensible space requirements. The Project would also maintain the required 100 feet of defensible space, would comply with California PRC Section 4291, and would comply with the County Fire Code for vegetation management and fire-safe operations.

In the event of a wildfire, post-fire conditions such as the removal of vegetation on hillside areas could increase the potential for erosion or slope instability. However, the Project would balance grading on-site (approximately 6,000 CY of cut and fill). The Project would comply with County Code Sections 16.08 (Grading) and 16.12 (Erosion Control), which mandate BMPs for slope stabilization and runoff control. Implementation of these existing local and state regulatory standards, combined with the Project's developed setting, managed landscaping, and proximity to firefighting resources, would reduce the potential for post-fire slope instability, runoff, or drainage impacts to less-than-significant levels.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

Note: Authority cited: Sections 21083 and 21083.05, PRC. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, PRC; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (sources: 1-42)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (sources: 1-42)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (sources: 1-42)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion/Mitigation:

Mandatory Findings Impact (a) Less-than-Significant Impact: As discussed in this Initial Study, the Proposed Project is located on an existing developed retirement community site that has been extensively graded, landscaped, and maintained since the early 1960s. Biological resources within the Project area consist primarily of ornamental landscaping, scattered oaks, and disturbed oak woodland. The Pre-Construction Tree Impact Assessment (Thompson, 2025) identified removal of protected oak and non-native trees for the proposed improvements, and the

Project would incorporate corresponding replanting and monitoring measures discussed in the Tree Protection Plan. With implementation of required County tree protection and replacement policies and mitigation measures, including **Mitigation Measure BIO-1**, biological impacts would remain less-than-significant. As such, the Proposed Project would not 1) substantially degrade the quality of the environment; 2) substantially reduce the habitat of a fish or wildlife species; 3) cause a fish or wildlife population to drop below self-sustaining levels; 4) threaten to eliminate plant or animal community; or 5) reduce the number or restrict the range of a rare or endangered plant or animal. Cultural resources evaluations, including the Phase I Archaeological Assessment (Historic Resource Associates, 2024) and Historic Assessment Reports (PAST Consultants, 2024; Archives & Architecture, 2025), found that the historic core of Carmel Valley Manor retains local significance under County criteria and that proposed changes are consistent with the Secretary of the Interior's Standards and would not result in a substantial adverse change in a historical resource. Archaeological investigations determined the probability of encountering subsurface resources to be very low. Standard inadvertent discovery procedures for archaeological materials and human remains are included as **Mitigation Measure CR-1**. Implementation of these measures ensures that the Project would not eliminate important examples of major periods of California history or prehistory. Implementation of these measures ensures that the Project would not degrade the quality of the environment or eliminate important examples of California history or prehistory. Therefore, impacts would be less-than-significant with mitigation incorporated.

Mandatory Findings Impact (b) Less-than-Significant Impact with Mitigation: To determine whether a cumulative effect requires an EIR, the lead agency shall consider whether the impact is significant and whether the effects of the project are cumulatively considerable (CEQA Guidelines Section 15064(h)(1)). In addition, CEQA allows a lead agency to determine that a project's contribution to a potential cumulative impact is not considerable and thus not significant when mitigation measures identified in the Initial Study would render those potential impacts less than considerable (CEQA Guidelines Section 15064(h)(2)).

The Proposed Project would result in limited, short-term construction-related impacts (e.g., noise, air emissions, and construction traffic), all of which would be temporary and reduced through implementation of County standard conditions and Project-specific mitigation measures (**Mitigation Measure N-1** and **Mitigation Measure TR-1**). The Project does not propose new population-generating land uses or infrastructure that could indirectly contribute to regional growth; therefore, the Project would not cumulatively affect population, housing, or public service demands. Potential impacts related to cultural resources, geology and soils, hazards, and land use are site-specific and would not combine with other regional projects to create cumulative effects. The Project would not generate substantial air pollutants or greenhouse gas emissions, and its operational impacts on aesthetics, biological resources, hydrology and water quality, noise, transportation, and utilities would remain consistent with the existing use of the site as a senior residential community. Improvements represent infill development consistent with the Carmel Valley Master Plan and would not contribute to growth-inducing or regionally significant impacts.

No other major development projects are proposed or under construction in the immediate vicinity. The nearby CAWD wastewater line extension project, which facilitates the Project's sewer connection, was previously analyzed under an IS/MND and is now completed; therefore, it does not represent an ongoing cumulative source of impact.

Based on the above, the Project's incremental contribution to cumulative impacts on air quality, greenhouse gas emissions, transportation, noise, and cultural resources would not be cumulatively considerable. Therefore, cumulative impacts would be less-than-significant with mitigation incorporated.

Mandatory Findings Impact (c) Less-than-Significant Impact with Mitigation: Impacts on human beings are generally associated with air quality, geological and soil hazards, hazardous materials, noise, transportation safety, and wildfire exposure. This IS/MND and relevant technical studies prepared for the Project have evaluated potential effects related to these issues.

As discussed in **Section VI.3, Air Quality** and **Section VI.8, Greenhouse Gas**, the Project would not result in a cumulatively considerable net increase in criteria pollutant emissions and would not expose sensitive receptors to substantial pollutant concentrations. The Project would not create a significant hazard to the public or the environment from hazardous materials, and the site is not listed on any hazardous materials database.

The Arias Geotechnical Report (Arias, 2024) found no unstable soils or geologic conditions that would pose risks to people or structures, provided that the Project implement standard CBC recommendations. The Transportation Analyses (Zhou Transportation Group, 2025; Hexagon Transportation Consultants, 2025) concluded that nearby intersections, including Carmel Valley Road and Los Arboles Drive, would continue to operate acceptably, and that adequate emergency access would be maintained during and after construction. Additionally, the implementation of **Mitigation Measure TR-1** would ensure that construction-related traffic impacts related to potential road hazards would be reduced to a less-than-significant level.

The Project would not generate operational noise levels exceeding the County's codified noise thresholds, and construction-related noise and traffic would be temporary and subject to County standards for allowable hours, routing, and equipment muffling (**Mitigation Measure N-1**). The Project site is located adjacent to the Mid-Carmel Valley Fire Station and within an area where compliance with State and County defensible-space and fire-safe design standards would minimize wildfire risk.

With implementation of the mitigation measures identified throughout this IS/MND – particularly those addressing construction noise, tree replacement, cultural resources, and traffic and transportation – the Project would not cause substantial adverse effects on human beings, directly or indirectly. Therefore, potential impacts to human health and safety would be less-than-significant with mitigation incorporated.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a “de minimis” (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a “de minimis” effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of “de minimis” effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of “no effect” on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department’s website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee.

Evidence: Based on the record as a whole as embodied in the HCD-Planning files pertaining to PLN240141 and the attached Initial Study / Proposed (Mitigated) Negative Declaration.

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