

Exhibit C

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EXHIBIT C

Addendum Pursuant to the California Environmental Quality Act Article 11, Section 15164

Planning File No. PLN150378 Amendment to an approved Combined Development Permit

1. Introduction

This addendum is required to identify and analyze minor technical changes proposed by an amendment to the approved Combined Development Permit (PLN140154), which was originally analyzed in a MND (Mitigated Negative Declaration) (PLN030646), allowing the remodel and expansion of the existing Carmel River Inn, located at 26600 Oliver Road, Carmel (Assessor's Parcel Number: 009-563-005-000).

The original project allowed an expansion of the Carmel River Inn from 43 units to 69 units (PLN030646) which included remodeling of existing cottages and main lodge, and the construction of five multi-unit combo structures. In 2007, the project was amended to reduce the multi unit structures from five structures to four while retaining the total of 69 units. The reduction of multi unit structures allowed the project to meet riparian setbacks and reduce potential biological resources impacts. In 2011, during the first two year extension of the project (PLN110577), the total units were reduced from 69 to 63 units based on review of water allocation credits by the Monterey Peninsula Water Management District. The project was extended for another two years in 2014 with no changes (PLN140154). The proposed amendment (PLN150378) proposes to retain 24 existing cottages, reduce 19 units in the main lodge to 17 units to accommodate a 624 square foot employee unit, and replace the four multi-unit combo structures with 22 RV park-model cabins.

This technical addendum has been prepared pursuant to Article 11, Section 15164 of the California Environmental Quality Act guidelines to make minor technical changes to the project analyzed in a MND, adopted by the Monterey County Planning Commission (Resolution No. 06013). None of the conditions described in Section 15162 calling for preparation of a subsequent EIR or negative declaration have occurred.

2. Scope and Purpose of this Addendum

The original approval, which was analyzed in the adopted MND for the project (PLN030646), analyzed potential impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Hydrology/Water Quality, Land Use Planning, Noise, and Transportation/Traffic. Consistent with Section 15164 of the CEQA Guidelines, this addendum compares the proposed amendment with the

analysis of the adopted MND to provide evidence that the technical changes of the amendment do not substantially change the adopted analysis.

Aesthetics: Section VI.1 of the MND analyzes removal of five (5) protected trees related to existing viewshed. The amendment proposes to retain the five trees slated for removal. Only one Holly (10 inches in diameter) will be removed which will not alter the viewshed from Highway 1. The RV units will be designed with a natural cedar exterior with a corrugated metal roof which is similar to the materials proposed for the multi unit structures. Each RV unit is between 300-360 square feet. The sizing and location of each RV unit are similar to the existing cottage. Therefore, the minor technical change presented by the proposed amendment does not substantially change the aesthetics analysis in the MND.

Air Quality: Section VI.3 of the MND based air quality impacts on 5,100 cubic yards of associated grading with no import or export of materials. The project as deemed a less-than-significant impact because air emission impact were temporary and did not exceed air quality thresholds of significant established by the Monterey Bay Unified Air Pollution Control District. The proposed amendment reduces associated grading from 5,100 cubic yards to 1,545 cubic yards which still does not exceed thresholds of significant established by the Monterey Bay Unified Air Pollution Control District. Therefore, the minor technical change presented by the proposed amendment does not substantially change the air quality analysis in the MND.

Biological Resources: Section VI.4 of the MND identifies potential conflicts with the combo structures encroaching 15 feet into the 150 feet setback from a riparian corridor. The proposed RV will meet the required 150 foot setback from riparian habitat and does not propose the removal of five native trees.

An updated biological assessment was provided by LSA associates, dated November 30, 2015. The assessment reviewed the property for potential impacts to federal and state protected species. Although the property is located adjacent to the Carmel River which is a suitable habitat for California red-legged frog and western pond turtle and other species, the project maintains a 150-foot setback from riparian vegetation habitat which the proposed development location does not have a suitable aquatic habitat or vegetation for said species. Additionally, the impacts from development (grading, tree removal, excavation due to liquefaction) will reduce substantially by the amendment project because the RV-units require less grading for the driveway, parking areas and pads than required to construct the two-story, multi-unit, combo structures. As recommended by the assessment, bird nesting survey and grading activity limitations to only the dry season have been included as conditions of project approval. Therefore, the minor technical update does not substantially change the potential impacts of biological resources as identified in the MND.

Cultural Resources: Section VI.5 of the MND analyzed potential impacts regarding the remodel of historic cottages which include demolition/relocation of one cottage. The impacts to cultural resources have not changed. All 24 existing cottages shall be

designated as a historic district and all repairs and remodel shall be consistent with the Secretary of the Interior's Standards for Historic Buildings.

Geology/Soils: Section VI.6 of the MND analyzed impacts due to high risk of liquefaction which still existing on the property. Pursuant to the Liquefaction Update Letter from Haro, Kasunich and Associates, dated December 21, 2015, the change between the combination of soil improvements and strengthened foundation design for the construction of combo unit and placement of RV units on pads with engineered earth mat (essentially float the pad and driveway over the liquefied soil) does not change the required mitigation for a final design-level geotechnical report. The amendment does not change the analyzed impacts and required mitigation measure.

Hydrology/Water Quality: Section VI.8 of the MND identifies potential impacts to and from the 100 year flood plain. The proposed project is located within the FEMA Special Flood Hazard Area (SFHA) Zone AE, 100-year floodplain of the Carmel River, as shown on FEMA Flood Insurance Rate Map 06053C-0320G. MCC subsection 16.16.050.J.1 which requires "until a regulatory floodway is adopted, no new construction, substantial development, or other development, (including fill) shall be permitted within Zones AE, unless it is demonstrated that the cumulative effect of the proposed development, when combined with all other development, will not increase the water surface elevation of the base flood more than one foot at any point" (Regulations for Floodplains in Monterey County, MCC Chapter 16.16). Mitigations were proposed to reduce impacts from the construction of the combo structures to a less-than-significant level by demonstrating through hydraulic analysis that the proposed project shall not result in any increase in the base flood elevation.

The amendment with the 22 RV-park model units included an acceptable hydraulic analysis prepared by TetraTech Inc., dated 10/28/2015, demonstrating compliance with MCC subsection 16.16.050.J.1. The hydraulic analysis concluded the proposed project resulted in no change to the 100-year water surface elevations at and upstream of the project site. The proposed RV design and circulation, 12 of the 22 RV units will to be relocated outside of the floodway during a flood emergency. All relocated RV units will be retained on the property in locations above the water surface elevation of 100 year flood. The other 10 of the 22 RV units are located in the 100 year floodplain but will be elevated above the water surface elevation of 100 year flood, and therefore, do not require relocation. The proposed RV units are consistent with Section 16.16.010 MCC in that the design promotes public health, safety and general welfare, and will minimize public and private loss due to flood conditions.

All mitigation measures related to the construction of the multi unit structures (Mitigation Action and Measures 6, 7 and 8 in the MND) are no longer valid. The following conditions of approval have been applied related to the proposed RV units:

- Foundation Plan – Enclosures/Grade Elevations: The applicant shall provide a foundation plan, prepared by a registered civil engineer or licensed architect,

certifying the 10 permanent RV cabins are compliant with the following regulations:

- All fully enclosed areas subject to flooding shall be designed to allow for the automatic entry and exit of floodwaters. Each enclosed area shall be defined and include a minimum of two openings on different sides.
 - The vents shall have a total net area not less than one square inch for every square foot of enclosed area subject to flooding.
 - The bottom of all openings shall be no higher than one foot above grade.
 - The foundation plan shall include a vent detail, the location and dimensions of all vents, as well as internal and external grade elevations.
 - All new construction materials below 25.0 feet (NAVD88) shall be resistant to flood damage.
- FEMA Zone AE Recreational Vehicle Plan (Condition No. 20): The applicant shall provide a recreational vehicle evacuation plan certifying the 12 cabins which will remain recreational vehicles and non-elevated. The plans shall demonstrate all recreational vehicles on-site will be fully licensed, maintained at all time to be ready for evacuation, attached to the site only by quick disconnect type utilities, clear of obstructions and has no permanently attached additions.
 - FEMA Zone AE Mobile Home Anchoring Plan: The applicant shall provide an anchoring plan and supporting calculations prepared by a registered civil engineer. In accordance with Monterey County Code Chapter 16.16.050, the 10 elevated RV cabins to meet floodplain requirements shall be designed to resist flotation, collapse, and lateral movement.
 - FEMA Zone AE Anchoring Certification: The applicant shall provide certification from a registered civil engineer that the 10 elevated RV cabins to meet floodplain requirements were constructed in accordance with the approved anchoring plan.

The amendment does not change the analysis. Technical updates related to the amended project identify conditions of approval in substantial compliances with the conclusions of the analysis in the MND.

Land Use/Planning: Section VI.9 of the MND identifies potential conflicts with the Carmel Area Land Use Plan and Coastal Implementation Plan - Part 4 due to the encroachment of proposed combo buildings 1 and 4 in the 150 foot riparian corridor setback. The proposed RV units meet setback and conforms to the Plans policies and regulations.

Noise: Section VI.11 of the MND identifies that construction will cause localized noise levels to temporarily increase above existing ambient levels. A condition of approval was applied to development activity plan to measure and minimize development activities impacts to adjoining residences in according with County's Noise Control Ordinance. Although the amendment would decrease the temporary noise impacts, the project must remain consistent with the County's Noise Control Ordinance and the condition of approval for a development activity plan is still required.

Transportation/Traffic: Section IV.13 of the MND analyzed traffic impacts. There is no increase in the number of proposed units, no proposed change in circulation, and subsequently no changes relative to traffic impacts. All original conditions and mitigations will still apply and will be incorporated in the conditions and mitigation monitoring program for this amendment. These measures addressed routing traffic away from the adjoining neighborhood and ensuring that there was proper sight distance on Highway 1 for incoming and outgoing traffic to the project.

3. Conclusion

Staff has reviewed the MND and has concluded that all of the changes of the proposed amendment (PLN150378) are below the thresholds established in the environmental document, which concluded with an adopted MND by the Planning Commission on February 22, 2006. Therefore, RMA-Planning determined the environmental review for the amended Carmel River Inn project is adequate and consequently did not prepare a subsequent Negative Declaration pursuant to Section 15162 of the CEQA guidelines.

Attachments

- Adopted Mitigated Negative Declaration
- "Biological Site Assessment at the Carmel River Inn" prepared by LSA Associates, Inc., dated November 30, 2015 and February 3, 2016.
- "Impact of Proposed Improvements for Carmel River In on the Carmel River Base Flood Elevations" prepared by Tetra Tech, Inc., dated October 28, 2015.
- "Liquefaction Update Letter" prepared by Haro, Kasunich and Associates, Inc., dated December 121, 2015.

County of Monterey, State of California
**MITIGATED NEGATIVE
DECLARATION**

FILED

JUN 01 2005

STEPHEN L. VAGNINI
MONTEREY COUNTY CLERK
DEPUTY

Project Title: IWF CARMEL RIVER INVESTORS LP
File Number: PLN030646
Owner: IWF CARMEL RIVER INVESTORS LP
ATTN VICE PRESIDENT ACQUISITIONS,
DBA CARMEL RIVER INN
1933 CLIFF DR STE 1 93109

Project Location: 26600 OLIVER RD CARMEL
Primary APN: 009-563-005-000
Project Planner: BRETT BECKER
Permit Type: Combined Development Permit

Project Description: COMBINED DEVELOPMENT PERMIT CONSISTING OF A GENERAL DEVELOPMENT PLAN FOR THE CARMEL RIVER INN TO INCREASE THE NUMBER OF GUEST UNITS FROM 43 EXISTING TO 69 PROPOSED AND TO CREATE AN HISTORIC DISTRICT; A COASTAL ADMINISTRATIVE PERMIT AND DESIGN APPROVAL FOR THE REMODEL OF 23 EXISTING COTTAGE UNITS, DEMOLITION OF ONE COTTAGE, REMODEL OF THE MAIN INN TO REDUCE THE NUMBER OF UNITS FROM 19 EXISTING TO 6, CONSTRUCTION OF 5 NEW TWO-STORY STRUCTURES EACH CONSISTING OF 8 GUEST UNITS ON THE SECOND FLOOR WITH PARKING BELOW, THE CONVERSION OF AN EXISTING MAINTENANCE BUILDING INTO AN EMPLOYEE UNIT, THE ABANDONMENT OF A PORTION OF OLIVER ROAD, GRADING (2,550 CU. YDS. CUT/2,550 CU. YDS. FILL); A COASTAL DEVELOPMENT PERMIT FOR THE REMOVAL OF 5 NATIVE TREES; AND A COASTAL DEVELOPMENT PERMIT FOR DEVELOPMENT WITHIN 100' FOR ENVIRONMENTALLY SENSITIVE HABITAT. THE PROJECT IS LOCATED AT 26600 OLIVER ROAD, CARMEL (ASSESSOR'S PARCEL NUMBER 009-563-005-000), CARMEL AREA, COASTAL ZONE.

THIS PROPOSED PROJECT WILL NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS IT HAS BEEN FOUND:

- a) That said project will not have the potential to significantly degrade the quality of the environment.
- b) That said project will have no significant impact on long-term environmental goals.
- c) That said project will have no significant cumulative effect upon the environment.
- d) That said project will not cause substantial adverse effects on human beings, either directly or indirectly.

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1933 CLIFF DR STE 1 93109

Project Location: 26600 OLIVER RD CARMEL
Primary APN: 009-563-005-000
Project Planner: BRETT BECKER
Permit Type: Combined Development Permit

Decision Making Body (check one):

- ☒ Planning Commission
☐ Zoning Administrator
☐ Board of Supervisors

- ☐ Subdivision Committee
☐ Chief of Planning Services
☐ Other: _____

Responsible Agency: County of Monterey
Review Period Begins: 06/03/2005
Review Period Ends: 07/02/2005

Further information, including a copy of the application and Initial Study are available at the Monterey County Planning & Building Inspection Department, Monterey County Courthouse, 240 Church St., Salinas, CA (831) 755-5025

Date Printed: 05/31/2005

MONTEREY COUNTY

PLANNING & BUILDING INSPECTION DEPARTMENT

2620 1st Avenue, Marina CA 93933

(831) 833-7500 FAX: (831)384-3261



NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION MONTEREY COUNTY PLANNING COMMISSION

NOTICE IS HEREBY GIVEN that the Monterey County Planning and Building Inspection Department has prepared a draft Mitigated Negative Declaration, pursuant to the requirements of the California Environmental Quality Act (CEQA), for a Combined Development Permit (Carmel River Inn, File Number PLN030646) at 26600 Oliver Road, Carmel (Assessor's Parcel Number 009-563-005-000) (see description below). The Mitigated Negative Declaration and Initial Study, as well as referenced documents, are available for review at the Monterey County Planning and Building Inspection Department, Coastal Office, 2620 1st Avenue, Marina and the Monterey County Clerk's Office, 240 Church Street, West Wing, Third Floor, Room 305, Salinas. Written comments on this Mitigated Negative Declaration will be accepted from **June 3, 2005 to July 2, 2005.**

Project Description: Combined Development Permit consisting of a General Development Plan for the Carmel River Inn to increase the number of guest units from 43 existing to 69 proposed and to create an historic district; a Coastal Administrative Permit and Design Approval for the remodel of 23 existing cottage units, demolition of one cottage, remodel of the main inn to reduce the number of units from 19 existing to 6, construction of 5 new two-story structures each consisting of 8 guest units on the second floor with parking below, the conversion of an existing maintenance building into an employee unit, the abandonment of a portion of Oliver Road, grading (2,550 cu. yds. cut/2,550 cu. yds. fill); a Coastal Development Permit for the removal of 5 native trees; and a Coastal Development Permit for development within 100 feet of environmentally sensitive habitat. The project is located at 26600 Oliver Road, Carmel (Assessor's Parcel Number 009-563-005-000), Carmel area, Coastal Zone.

FOR ADDITIONAL INFORMATION CONTACT:
Jeff Main, Planning and Building Services Manager
Monterey County Planning & Building Inspection Department
2620 1st Avenue
Marina, CA 93933
(831) 883-7531 or mainj@co.monterey.ca.us

For reviewing agencies: The Planning and Building Inspection Department requests that you review the enclosed materials and provide any appropriate comments related to your agency's area of responsibility. The space below may be used to indicate that your agency has no comments or to state brief comments. In compliance with Section 15097 of the CEQA Guidelines, please provide a draft mitigation monitoring or reporting program for mitigation measures proposed by your agency. This program should include specific performance objectives for mitigation measures identified (CEQA Section 21081.6(c)). Also inform this Department if a fee needs to be collected in order to fund the mitigation monitoring or reporting by your agency and how that language should be incorporated into the mitigation measure.

Distribution: (see below)

- ____ No Comments provided
____ Comments noted below
____ Comments provided in separate letter

COMMENTS: _____

Return to: Jeff Main, Planning and Building Services Manager
Monterey County Planning and Building Inspection Department
2620 1st Avenue
Marina, CA 93933

From: Agency Name: _____
Contact Person: _____
Phone Number: _____

DISTRIBUTION

1. State Clearinghouse (15 copies)—include Notice of Completion
2. Monterey County Clerk's Office (2 copies)
3. Carmel Highlands Fire Protection District
4. Monterey County Water Resources Agency
5. Monterey County Public Works Department
6. Monterey County Parks Department
7. Monterey County Division of Environmental Health
8. Paul E. Davis, Applicant
9. IWF Carmel River Investors, Owner
10. Property Owners within 300 feet

MONTEREY COUNTY

PLANNING & BUILDING INSPECTION DEPARTMENT

2620 First Avenue, Marina, CA 93933

PHONE: (831) 883-7500; FAX: (831) 384-3261



INITIAL STUDY

I. BACKGROUND INFORMATION

Project Title: Carmel River Inn

File No.: PLN030646

Project Location: 26600 Oliver Road, Carmel unincorporated area

Name of Property Owners: IWF Carmel River Investors, LP

Name of Applicant: Paul E. Davis, architect

Assessor's Parcel Number: 009-563-005-000

Acreage of Property: 10.8

General Plan Designations: Commercial - Recreation Visitor Serving, and
Resource Conservation - Wetlands & Coastal Strand

Zoning Districts: Visitor Serving/Commercial and Resource Conservation,
Design Control District, Coastal Zone

Lead Agency: Planning & Building Inspection Department

Prepared By: Brett C. Becker, Associate Planner

Date Prepared: May 25, 2005

Contact Person: Jeff Main

Phone Number: (831) 883-7531

Electronic Mail Address: mainj@co.monterey.ca.us

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II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Project Description:

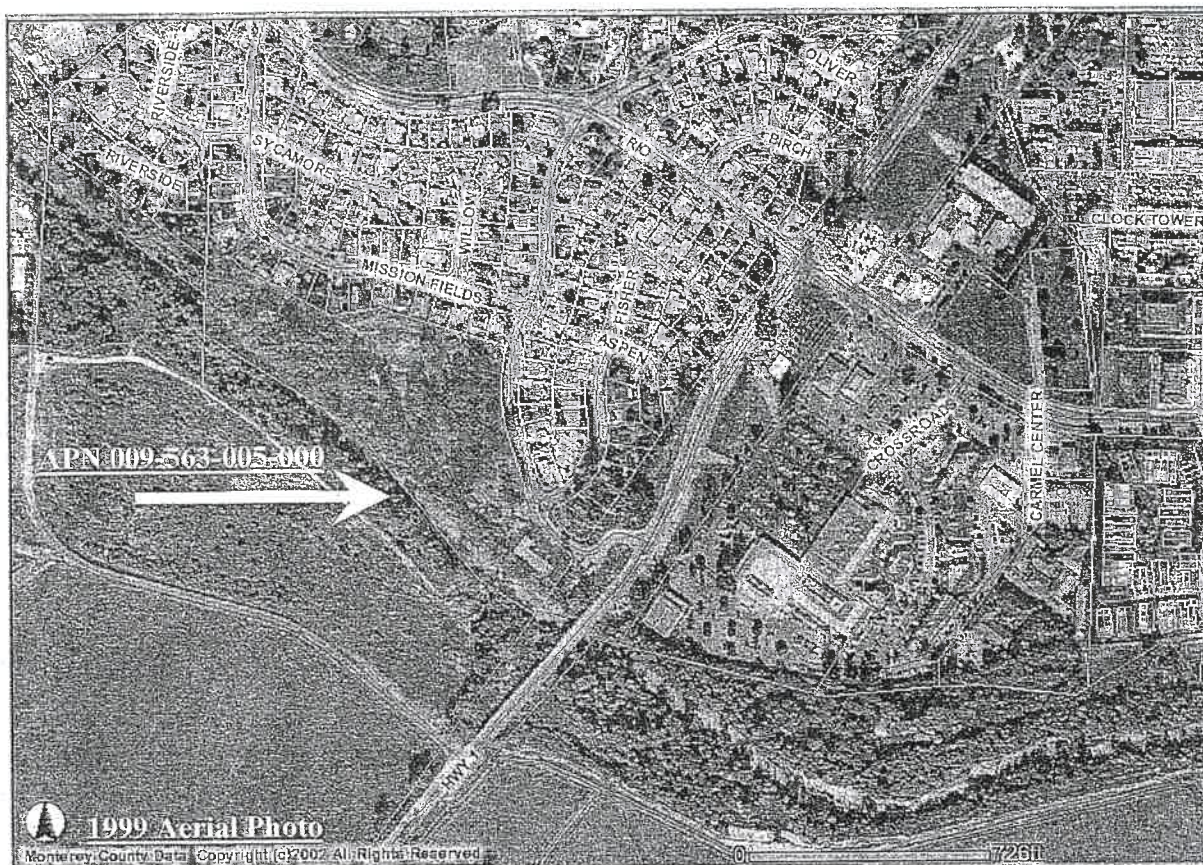
The project seeks to:

- increase the number of guest units from 43 (existing) to 69 total (proposed);
- create an historic district that would encompass the El Rio Carmelo Motor Court;
- remodel 19 existing cottage units according to the Secretary of the Interior's Standards for the Remodel of Historic Structures;
- demolish one historic cottage;
- remodel the main two-story inn building to reduce the number of existing units from 19 to 6;
- construct 5 new two-story structures each consisting of 8 guest units on the second floor with parking below;
- convert an existing maintenance building into an employee unit to compensate for the unit that will be eliminated as a result of the remodel of the main inn building;
- acquire the County's abandonment of a portion of Oliver Road;
- allow grading (2,550 cu. yds. cut/2,550 cu. yds. fill);
- remove 5 protected native trees; and
- allow development within 100' for environmentally sensitive habitat (Carmel River).

B. Environmental Setting and Surrounding Land Uses:

The subject parcel is about 10.8 acres in size and is located immediately northwest of the Highway 1 bridge over the Carmel River. It has been used as a motor-court hotel and campground since 1934. Twenty-three historic cottages are located on the parcel, most of which date from 1934. Although this site has been altered for well over 100 years by a variety of human uses, it remains forested with a variety of trees that provide suitable habitat for several species of birds. The Carmel River borders the parcel on the south. According to the biological survey prepared for the project, the earthen levee along the southern portion of the project site, which contains riparian habitat and is zoned "*Resource Conservation*," is the most ecologically valuable part of the property even though it is infested with cape ivy. The proposed project will occur solely within the area of the property zoned "*Visitor Serving/Commercial*," which is currently developed.

The surrounding lands to the west and north were subdivided for residential development in the 1950s as part of the Mission Fields Subdivision. Across Highway 1 from the project site is the Crossroads Shopping Center.



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 type="checkbox"/>	Local Coastal Program-LUP	<input checked="" type="checkbox"/>

Air Quality Management Plan: Grading for the proposed site improvements and the use of heavy machinery have the potential to create minimal short-term air quality impacts. Ozone emissions from project construction are accommodated within the emission inventories of the Air Quality Management Plan and will not have a significant impact on the attainment or maintenance of ozone Ambient Air Quality Standards (Reference #6, page 5-3).

Monterey County certified Local Coastal Program – Carmel Area Land Use Plan: The Carmel Area Land Use Plan (Reference #3) designates the proposed project area with a “Commercial - Recreation Visitor Serving” land use designation. The subject parcel also has portions with a

"Resource Conservation - Wetlands & Coastal Strand" land use designation. However, these portions of the property are not proposed for development. The proposed project is consistent with allowable uses under these designations.

The project is consistent with the Local Coastal Program's public coastal access requirements since the project will not block any historic shoreline access routes and the project site is well inland from the shoreline.

Monterey County General Plan: The only policy area of the General Plan that is not addressed by the documents cited above is Noise Hazards. The project is consistent with these General Plan policies, as explained below in section IV.A.

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"/> Agricultural Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology/Soils |
| <input 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 type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | | |

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 impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or

maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE: Based upon the planner's project analysis, many of the above topics on the checklist do not apply. Less than significant impacts or potentially significant impacts are identified for **aesthetics, air quality, biological resources, cultural resources, geology/soils, hydrology/water quality, land use/planning, noise and transportation/traffic**. Mitigation measures are provided as warranted. The project will have no quantifiable adverse environmental effect on the categories not checked above, as follows:

Agricultural Resources: The site is not zoned for agricultural use and is not under a Williamson Act contract. Therefore, the project will not result in an impact to agricultural resources. Surrounding properties to the north and west are in residential use. A shopping center is located east of the subject parcel across Highway 1. To the south is the Carmel River and associated wetlands. (Source: 1, 3, 4, 7)

Hazards/Hazardous Materials: The project is for an expanded visitor serving commercial use and will not result in storage and/or application of fertilizers or chemicals beyond those used for normal yard-maintenance and housekeeping purposes. (Source: 1, 3, 4, 7, 8)

Mineral Resources: The project will not result in the loss or availability of a state or locally important mineral resource recovery site identified in the Monterey County General Plan. (Source: 1, 2, 3, 8)

Population/Housing: The proposed project will not induce growth and will not displace housing or people. (Source: 1, 2, 3, 4)

Public Services: Development of the proposed project will not impact existing service ratios, response times, or other performance objectives for any public service due to its limited scale within an existing community with adequate public service capacity, as evidenced by the County's interdepartmental review of the project. (Source: 1, 2, 3, 4)

Recreation: The project will not 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 because of the project's modest scope in comparison with the capacity of existing recreational facilities and opportunities in the area. The project does not include recreational facilities, nor requires the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (Source: 1, 2, 3, 4)

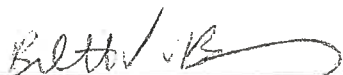
Utilities/Service Systems: The existing public and private utilities and service systems, including water supplies, wastewater treatment facilities, stormwater

infrastructure, and solid waste services, are of adequate capacity to serve the project as evidenced by the County's interdepartmental review of the project. (Source: 1, 2, 3, 4)

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

Brett C. Becker

Printed Name

May 25, 2005

Date

Associate Planner

Title

Exhibit C

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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 that 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.

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VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect on a scenic vista? (Source: 1, 3, 4, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Source: 1, 3, 4, 7, 12)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially degrade the existing visual character or quality of the site and its surroundings? (Source: 1, 3, 4, 7)	<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? (Source: 1, 3, 4, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The project involves exterior improvements to a two-story motel unit visible from Highway 1, which is a State scenic highway, as well as to other cottage units not visible from Highway 1. Also involved is the removal of 5 protected native trees. However, the trees proposed for removal are not visible from Highway 1 and therefore will not negatively impact scenic resources. Overall, the proposed design of the project, which involves rustic stone and wood elements, represents an aesthetic improvement for the area, as compared to the existing non-descript motel design. It does not represent a potentially substantial adverse effect on a scenic vista due to the topography of the area, and it will not substantially degrade the existing visual character or quality of the site or its surroundings as explained above.

The project design will be consistent with visual resource policies of the Local Coastal Program. Specifically, Policy 2.2.2 of the Carmel Area Land Use Plan, which states that "*all future development within the viewshed must harmonize and be clearly subordinate to the natural scenic character of the area.*" Standard conditions of approval will require submittal of a lighting plan subject to approval by the Director of Planning and Building Inspection. The lighting plan will be reviewed by staff to ensure that the project does not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area through the use of limited low-wattage down-lighting.

Conclusion:

Therefore, potential impacts related to scenic resources and visual character will be less-than-significant and no special mitigation measures will be required.

Exhibit C

2. AGRICULTURAL 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.

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? (Source: 1, 3, 4, 7)	<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? (Source: 1, 3, 4, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? (Source: 1, 3, 4, 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

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? (Source: 1, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Source: 1, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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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
c)	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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Source: 1, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Result in significant construction-related air quality impacts? (Source: 1, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Expose sensitive receptors to substantial pollutant concentrations? (Source: 1, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Create objectionable odors affecting a substantial number of people? (Source: 1, 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The proposed project involves 5,100 cubic yards grading (2,550 cubic yards of cut and 2,550 cubic yards of fill) with no import or export of material. The entire area of the project site is 10.8 acres while the area proposed for grading and excavation is much less. The Monterey Bay Unified Air Pollution Control District (MBUAPCD) has established a threshold of significance for PM₁₀ of 82 lb/day of direct emissions. This threshold has been translated by the MBUAPCD into the following thresholds for estimating significance:

- 8.1 acres per day for construction projects with minimal earthmoving; and
- 2.2 acres per day for construction projects involving earthmoving, including grading and excavation.

These thresholds assume 21.75 working weekdays per month including daily watering of the site. Construction projects within these thresholds are assumed to be within the 82 lb/day threshold-of-significance for PM₁₀. Consequently, the proposed amount and area of grading would not have a significant effect based on the above thresholds, but may still generate short-term construction-related air-quality impacts. These may be minor increases in emissions from construction vehicles and dust generation, including a temporary increase in localized levels of PM₁₀. However, standard erosion-control and dust-suppression practices will be implemented as conditions of the grading permit in order to fulfill the requirements of the County's Grading and Erosion Control Ordinances (Chapters 16.08 & 16.12 of the County Code).

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Conclusion:

Therefore, any potentially negative air-quality impacts will remain at less-than-significant levels without the need for special non-standard conditions of approval or mitigation measures, due to their temporary and minimal nature.

4. BIOLOGICAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
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? (Source: 1, 3, 4, 7, 8, 10, 11, 12)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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? (Source: 1, 3, 4, 7, 8, 10, 11, 12)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Source: 1, 7, 8, 10, 11)	<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? (Source: 1, 7, 8, 10, 11)	<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? (Source: 1, 2, 3, 4, 7, 8, 10, 11, 12)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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? (Source: 1, 7, 8, 10, 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Discussion:

According to the historical assessment prepared for the subject project, the Carmel River Inn property was part of a larger ranch in the 1800s used for raising cattle, and since at least 1934, the property has been used as a motor-court hotel and campground. Meanwhile, the surrounding lands to the west and north were used for growing artichokes since at least the early part of the last century until they were subdivided in the 1950s as part of the Mission Fields Subdivision. Also around this time, the Army Corps of Engineers constructed the earthen flood-control levee that runs along the southern portion of the property. Therefore, the natural habitat values of this site have been impacted for over 100 years by human intervention. Nevertheless, the site is forested with a variety of trees that provide suitable habitat for several species of birds, as indicated in the biological survey prepared for the project.

According to the biological survey, the earthen levee along the southern portion of the project site, which contains riparian habitat, is the most ecologically valuable part of the property even though it is infested with cape ivy. However, this area of the parcel will not be impacted by the proposed project. Therefore, no special mitigation measures are required to address any potential impacts. The biologist recommends measures to enhance this habitat, which will be incorporated as conditions of project approval.

One area of potential conflict with local regulations includes the protection of riparian habitats, which requires a 150 foot setback from riparian plant communities associated with perennial streams (Section 20.146.040.C.2.c of the *Regulations for Development in the Carmel Area Land Use Plan*). The project proposes an encroachment of 15 feet into this setback for three of the new Combo Units. However, this regulation also states that, "*the setback requirement may be modified if it can be demonstrated that a narrower corridor is sufficient to protect existing riparian vegetation.*" According to Dr. Jeffrey B. Froke, who prepared the biological survey for this project, the 15 foot encroachment into the 150 foot riparian setback would not violate the ecological or biological intent of this setback requirement due to the developed state of the project site, and due to the presence of the earthen levee along the southern portion of the property. The biologist notes that the earthen levee along this portion of the Carmel River serves as an effective barrier between the river's riparian habitat and the development. Therefore, no conflict is found with the aforementioned regulation, and no special mitigation measure is required to address any potential impacts due to encroachment into the 150 foot riparian setback.

With regards to tree removal, a total of eight (8) trees are proposed for removal as part of the subject project. Of these, five (5) are protected native trees, which include one (1) landmark willow tree (33" DBH) that will be removed due to its hazardous condition and four (4) cottonwood trees (14", 16", 17", and 21" DBH) that will be removed to construct Combo Unit 1. According to Glenn C. Flamik of Forest City Consulting, who prepared the Forest Management Plan for this project, the willow tree has a major cavity at about 12 feet high and another cavity 8 inches wide at the base of the tree. Due to its size and location, these cavities make this tree a hazard. The removal of the four cottonwood trees in order to construct Combo Unit 1 is required due to the site constraints of the parcel. These trees and the willow will be replaced on at least a 1:1 ratio in order to fulfill the regulatory requirements of the Local Coastal Program. In addition,

several native trees will be planted along the northern property line as a buffer for existing nearby residences. Therefore, no special mitigation measures are required for the proposed tree removal.

Conclusion:

No environmentally sensitive resources will be impacted by the proposed project. The proposed tree removal and replacement, as well as the reduced riparian setback, are consistent with the requirements of the Local Coastal Program. Therefore, no special mitigation measures are required.

5. CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? (Source: 1, 3, 4, 8, 9, 13)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? (Source: 1, 3, 4, 8, 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Source: 1, 3, 4, 8, 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries? (Source: 1, 3, 4, 8, 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

Archaeology – The subject parcel is located within an area of high archaeological sensitivity as identified by data in the Monterey County Geographic Information System and Local Coastal Program. A preliminary archaeological reconnaissance of the property was prepared by Archaeological Consulting, Inc., dated March 5, 2004. Research of background files at the Northwest Regional Information Center did not identify any known archaeological sites on the property. Field reconnaissance of the project site did not find any material frequently associated with prehistoric cultural resources, such as dark midden soil, shell fragments, bone, etc. Nevertheless, a standard condition of project approval will require construction to be halted if cultural resources are found during construction/grading activities.

Historical Significance – The Carmel River Inn property (originally known as El Río Carmelo Motor Court) has been used as a motor-court hotel and campground since at least 1934, according to the findings of the historical assessment prepared for the subject project (although the site is no longer used a campground). A “*Historical and Architectural Evaluation*” was prepared for the proposed project by local historian Kent Seavey, who states that it was prepared

using methodology recommended by the National Park Service. Mr. Seavey found that neither the site nor any of the structures are listed on the local, state, or federal historical registers. Nevertheless, using both state and federal criteria for historical significance, Mr. Seavey found that 19 of the 22 existing structures should be considered historic due to their age and due to the architecture and high concentration of "little-altered 1930s motor court cabins" at the site. Mr. Seavey therefore concludes that they would be eligible for listing as an historic district in the California Register of Historic Places, at the local level of significance, in addition to being eligible for listing on the National Register. The remaining 3 buildings were not found to have historic value in light of their age and because the architectural styles of these buildings are not consistent with the original buildings or because they have been altered over time.

Proposed Demolition – Cabin #22 ("Sherman"), which is one of the original cabins built circa 1934, is proposed for demolition. This cabin lies outside of the proposed historic district and within the path of a proposed new roadway that would lead to the proposed new units. The cabin is one that can be considered to contribute to the historic significance of the site due to its age, architecture, and relatively unaltered state. Therefore, its demolition could be considered "a substantial adverse change in the significance of an historical resource" (CEQA Guidelines, Section 15064.5.b). It is feasible to mitigate this potentially significant environmental impact to a less-than-significant level by relocating this cabin on the property within the proposed historic district, as stipulated below.

Proposed Remodels – According to the project historian, the proposed remodel of the 19 historic cabin buildings onsite (including cabin #22) must follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, under the treatment for rehabilitation, in order to mitigate the proposed remodels to a less-than-significant level (pursuant to Section 15064.5.b.3 of the CEQA Guidelines). Several "Design Approvals" and building permits have been recently issued for the remodel of these buildings. These individual projects were Categorically Exempted from CEQA review under Class 1 (Existing Facilities) since it was found that the proposed remodels would not cause a substantial adverse change in the significance of a historical resource (CEQA Guidelines Section 15300.2.f (Exceptions)). This is due to the applicant's proposal to follow the Secretary of the Interior's Standards for the Treatment of Historic Properties, under the treatment for rehabilitation.

Conclusion:

The project lies in an area of high archaeological sensitivity yet no known archaeological sites were identified on the property. Nevertheless, a standard condition of project approval will require construction to be halted if cultural resources are found during construction/grading activities. 19 of the 22 existing structures on the site are considered to be historic and will be restored consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, under the treatment for rehabilitation. The project proponent proposes to create an historic district to encompass these 19 historic cabins. One cabin (#22) shall be relocated rather than demolished in order to mitigate any potentially significant impacts to a less-than-significant level.

Mitigations:

Mitigation Measure 1 – In order to avoid a substantial adverse change in the significance of an historical resource, cabin #22 (“Sherman”), which is one of the original cabins built ca. 1934, shall be relocated on the property within the proposed historic district (instead of demolished), consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, with the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building, or with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, as deemed appropriate and approved by a qualified historian.

Monitoring Action 1 – Prior to the issuance of grading or building permits, the applicant shall submit a revised site plan indicating the proposed new location of cabin #22, as well as a relocation and rehabilitation plan prepared by a qualified historian, which verifies that the plan is consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, with the Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Building, or with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, as deemed appropriate. The revised site plan and relocation and rehabilitation plan for cabin #22 shall be subject to approval by the Director of Planning and Building Inspection.

6. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to 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? (Source: 1, 3, 4, 8, 14, 15)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking? (Source: 1, 3, 4, 8, 14, 15)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction? (Source: 1, 3, 4, 8, 14, 15, 19, 20, 21)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides? (Source: 1, 3, 4, 8, 14, 15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil? (Source: 1, 3, 4, 8, 14, 15)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6. GEOLOGY AND SOILS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 3, 4, 8, 14, 15, 19, 20, 21)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (Source: 1, 3, 4, 8, 14, 15, 19, 20, 21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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? (Source: 1, 3, 4, 8, 14, 15, 19, 20, 21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The subject parcel is located right on the border between low (II) and very high (VI) seismic-hazard-sensitivity zones, according to the Seismic Hazards Map of the *Carmel Area Land Use Plan*. According to information available via the Planning & Building Inspection Department's Geographic Information System (GIS), the subject parcel lies in an area with a low risk of landslides but with a moderate risk of erosion and a high risk of liquefaction. According to the USGS Soil Survey, soils on the subject parcel are known as "*elder very fine sandy loam*," which occurs on 2 to 9 percent slopes. The parcel is not located within 1/8 of a mile of any know active or potentially-active seismic fault line. Due to the high risk of liquefaction, a geology report was required.

D&M Consulting Engineers, Inc., prepared a preliminary geological investigation, dated March 11, 2004. This initial investigation indicated the need for a more detailed liquefaction study. Therefore, follow-up reports were prepared. These reports were also prepared by D&M Consulting Engineers, and are dated November 24, 2004, January 5, 2005, March 15, 2005 and March 16, 2005. Based on an analysis of bore samples, the consulting geotechnical engineer concluded that the site has a high liquefaction potential, and that the liquefiable soils extend to a depth of at least 35 feet below the ground's surface.

The large magnitude of the liquefaction-induced ground deformation at the site will most likely preclude the use of pile foundations or structural mats for foundation support of the buildings. Mitigation of liquefaction related problems at this site can best be accomplished through some combination of soil improvement and strengthened foundation design. Soil improvement could include some method of in-situ ground densification, such as vibro-replacement stone columns. Strengthened foundation design might include shallow foundations reinforced with grade beams designed to resist minor differential settlements.

A mitigation measure based on the consulting geotechnical engineer's recommendations is listed below and will be required in order to minimize potential impacts resulting from the risk of liquefaction in the project area to less-than-significant levels.

Conclusion:

In general, the report concludes that the risk of seismic-induced liquefaction is high at the project site. A mitigation measure recommended by the consulting geotechnical engineer will be required in order to reduce this risk to a less-than-significant level.

Mitigations:

Mitigation Measure 2 – In order to reduce the risk of impacts from seismic-induced liquefaction to less-than-significant levels, the preparation of a final design-level geotechnical report will be required which includes geotechnical criteria for design and construction of the proposed improvements. These improvements shall include some combination of soil improvement and strengthened foundation design. Soil improvement shall include some method of in-situ ground densification, such as vibro-replacement stone columns. Strengthened foundation design shall include such methods as shallow foundations reinforced with grade beams designed to resist minor differential settlements.

Monitoring Action 2.A – Prior to issuance of grading or building permits, the applicant shall submit a final design-level geotechnical report to the Planning and Building Inspection Department for review and approval.

Monitoring Action 2.B – Prior to issuance of grading or building permits, the applicant shall submit grading and building plans that have been reviewed and approved by a registered geotechnical engineer, and verified as consistent with the recommendations of the final design-level geotechnical report required by *Monitoring Action 2.A*. All applicable grading and building plans shall be signed and wet-seal stamped by the consulting registered geotechnical engineer as evidence of verification that they are consistent with the recommendations of the final design-level geotechnical report.

7. HAZARDS AND HAZARDOUS MATERIALS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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7. HAZARDS AND HAZARDOUS MATERIALS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 for people residing or working in the project area? (Source: 1, 3, 4, 7, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? (Source: 1, 3, 4, 7, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (Source: 1, 3, 4, 7, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

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8. 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? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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, in a manner which would result in substantial erosion or siltation on- or off-site? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (Source: 1, 3, 4, 8, 16, 19, 20, 21)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows? (Source: 1, 3, 4, 8, 16, 19, 20, 21)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (Source: 1, 3, 4, 8, 16, 19, 20, 21)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow? (Source: 1, 3, 4, 8, 14)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The Monterey County Water Resource Agency (MCWRA) reviewed the proposed project as part of the County's interdepartmental review process. The MCWRA's assessment of the project and concurrence with the consultants' reports was communicated to the PBID in a memo dated April 13, 2005, which states in part that:

The parcel is located completely within Zone A7, 100-year floodplain of the Carmel River, as shown on FEMA Flood Insurance Rate Map 060195-0180 E, revised date August 5, 1986. The effective base flood elevation is 22-26 feet mean sea level. FEMA did not define a floodway in this area.

The Agency received a report prepared by Balance Hydrologics Inc., dated July 23, 2004, summarizing the pre- and post- project HEC-RAS modeling results. According to the report, the maximum increase in Base Flood Elevation (BFE) is 0.41 feet, and the maximum decrease in BFE is 0.56 feet. The modeling results certify the proposed project will not adversely affect the flood capacity of the Special Flood Hazard Area.

The Agency received a memo prepared by D&M Consulting Engineers, dated March 15, 2005, identifying the need for a stone column foundation that will raise the site approximately 1 foot in the treatment area. Therefore, a revision to the report prepared by Balance Hydrologics Inc., dated July 23, 2004, summarizing the pre- and post- project HEC-RAS modeling results, is required to reflect the new proposed ground surface elevations.

The Agency received a letter prepared by Kenneth M. Whitson, P.E. with Whitson Engineers, dated July 22, 2004, stating it is his opinion that: 1. The proposed development will not significantly reduce the capacity of the existing river or otherwise adversely affect any other properties by increasing velocities or depths, or diverting flow; and, 2. The proposed development will be safe from flow related erosion and will not cause flow related erosion hazards or otherwise aggravate flow related erosion hazards.

A FEMA Elevation Certificate was submitted with the application certifying the top of bottom floor elevation, for the Main Inn, is 26.43 feet MSL. The structure has a concrete slab foundation, and the effective Base Flood Elevation, at this location, is 25.2 feet MSL.

Standard conditions of approval recommended by the MCWRA require that the applicant:

- record a deed notice stating that the property is located within a floodplain and may be subject to building and/or land-use restrictions;
- obtain proof of water availability in the form of an approved Monterey Peninsula Water Management District water-release form;
- provide the MCWRA with information on the well to serve the project including a map showing the well location and any available well logs/e-logs; and

- comply with Ordinance No. 3932, or as subsequently amended, of the MCWRA pertaining to mandatory water conservation regulations.

However, the MCWRA also recommends that the proposed project comply with nine “*non-standard conditions of approval*” (i.e., mitigation measures), which are detailed below. Successful fulfillment of these conditions/mitigation measures will ensure that any environmental impacts caused by the subject project will remain at less-than-significant levels.

Conclusion:

Initial and subsequent reports prepared by Balance Hydrologics, Inc. and Whitson Engineers conclude that the proposed work at the Carmel River Inn will have only modest impacts on local water surface elevations during the one-percent chance flood event. Water surface elevations are predicted to be both higher and lower, with a maximum increase of 0.41 feet near the middle of the property. The MCWRA has recommended nine non-standard conditions of approval/mitigation measures, which will mitigate all potential environmental impacts to less-than-significant levels. The non-standard conditions/mitigation measures are listed below.

Mitigations:

Mitigation Measure 3 – In order to reduce the risk of flooding of the project site, the hydraulic analysis and report prepared by Balance Hydrologics, dated July 23, 2004, shall be updated to reflect the new cross-sections resulting from the construction of stone columns and the placement of associated fill material. The proposed project shall not result in more than a 1-foot rise in the base flood elevation. The updated hydraulic analysis shall be submitted to the Water Resources Agency for review and approval.

Monitoring Action 3 – Prior to issuance of any grading or building permits, the applicant shall submit the updated hydraulic analysis and report to the Water Resources Agency for review and approval.

Mitigation Measure 4 – In order to reduce the risk of flooding of the project site, the applicant shall provide the Water Resources Agency “as-built” final grading plans for review and approval.

Monitoring Action 4 – Prior to finalizing the grading permit, the applicant shall submit a copy of the “as-built” grading plans to the Water Resources Agency for review and approval.

Mitigation Measure 5 – In order to reduce onsite and offsite drainage impacts to less-than-significant levels, the applicant shall provide the Water Resources Agency a drainage plan prepared by a registered civil engineer or architect addressing on-site and off-site impacts. The plan shall include oil-grease/water separators for the paved parking areas. Drainage improvements shall be constructed in accordance with plans approved by the Water Resources Agency.

Monitoring Action 5 – Prior to issuance of any grading or building permits, the applicant shall submit 3 copies of the drainage plan to the Water Resources Agency for review and approval.

Mitigation Measure 6 – In order to reduce the risk of flooding of the new combo units to less-than-significant levels, the lowest floor and attendant utilities for the proposed units shall be constructed, at a minimum, 1-foot above the base flood elevation provided by the Water Resource Agency. The applicant shall provide the Water Resources Agency certification from a registered civil engineer or licensed land surveyor that a reference marker has been established at the building site to provide for the floodproofing and certification of the lowest floor elevation.

Monitoring Action 6 – Prior to issuance of any grading or building permits, the applicant shall submit a letter, certifying the reference marker has been established, to the Water Resources Agency for review and approval.

Mitigation Measure 7 – In order to reduce the risk of flooding of the new combo units to less-than-significant levels, all fully enclosed areas below the lowest floor that are subject to flooding shall be designed to automatically equalize hydrostatic flood forces on exterior walls by allowing for the entry and exit of floodwaters. A minimum of two openings having a total net area of not less than one square inch for every square foot of enclosed area shall be provided. The bottom of all openings shall be no higher than one foot above grade. The applicant shall provide the Water Resources Agency a foundation plan, for each new unit and the main inn, prepared by a registered civil engineer showing the internal and external grade elevation, as well as, the location and dimensions of all vents.

Monitoring Action 7 – Prior to issuance of any grading or building permits, the applicant shall submit a foundation plan, for each new unit, to the Water Resources Agency for review and approval.

Mitigation Measure 8 – In order to reduce the risk of flooding of the new combo units to less-than-significant levels, the applicant shall provide the Water Resources Agency certification from a registered civil engineer that the proposed laundry/house keeping/storage rooms in the Combo Units will meet the following floodproofing provisions:

1. The structures, together with attendant utilities and sanitary facilities, are watertight, at a minimum, to 1 foot above the base flood elevation provided by the Water Resources Agency with walls substantially impermeable to the passage of water.
2. All structural components are capable of resisting hydrostatic and hydrodynamic forces, including the effects of buoyancy, and anticipated debris impact forces.

Monitoring Action 8 – Prior to issuance of any grading or building permits, the applicant shall submit a letter, plans, and supporting calculations, prepared by a registered civil engineer, to the Water Resources Agency for review and approval.

Mitigation Measure 9 – In order to avoid conflict with the Regulations for Floodplains in Monterey County, the applicant shall provide substantial-improvement determinations, for all buildings that include an addition and/or remodel, to the Water Resources Agency. The substantial-improvement determination shall include an appraisal of the market value of the structure and a cost estimate for the proposed project. If any addition/remodel equals or exceeds

50 percent of the market value of the structure, the existing structure and addition shall be elevated in accordance with Chapter 16.16 of the Monterey County Code.

Monitoring Action 9 – Prior to issuance of any grading or building permits, the applicant shall submit a substantial improvement determination to the Water Resources Agency for review and approval.

Mitigation Measure 10 – In order to avoid conflict with the Regulations for Floodplains in Monterey County, the applicant shall provide the Water Resources Agency a FEMA Elevation Certificate completed by a registered civil engineer or licensed land surveyor, certifying the forms have been set at a height that will ensure the minimum lowest floor elevation requirement.

Monitoring Action 10 – Prior to the foundation pre-pour inspection, the applicant shall submit a completed FEMA Elevation Certificate, for each new unit, based on building under construction, to the Water Resources Agency for review and approval.

Mitigation Measure 11 – In order to avoid conflict with the Regulations for Floodplains in Monterey County, the applicant shall provide the Water Resources Agency a FEMA Elevation Certificate, based on finished construction, for each new unit and the main inn. The Elevation Certificates shall be completed by a registered civil engineer or licensed surveyor to certify each structure has been constructed in accordance with Chapter 16.16 of the Monterey County Code.

Monitoring Action 11 – Prior to final inspection, the applicant shall submit a completed FEMA Elevation Certificate, for each new unit, based on finished construction, to the Water Resources Agency for review and approval.

9. LAND USE AND PLANNING	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community? (Source: 1, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Source: 1, 2, 3, 4, 5, 6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (Source: 1, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Discussion:

Zoning – The property is zoned “*Visitor Serving/Commercial*” and “*Resource Conservation*” in a Design Control District within the Coastal Zone. The proposed project will occur within the area zoned “*Visitor Serving/Commercial*,” where it is considered an allowable use subject to discretionary approval.

Environmentally Sensitive Habitat Regulations – One area of potential conflict with local regulations involves the protection of riparian habitats, which requires a 150 foot setback from riparian plant communities associated with perennial streams (Section 20.146.040.C.2.c of the *Regulations for Development in the Carmel Area Land Use Plan*). The project proposes an encroachment of 15 feet into this setback for three of the new Combo Units. However, this regulation also states that, “*the setback requirement may be modified if it can be demonstrated that a narrower corridor is sufficient to protect existing riparian vegetation.*” According to Dr. Jeffrey B. Froke, who prepared the biological survey for this project, the proposed 15 foot encroachment into the required setback “*would not violate the ecological or biological intent of the riparian setback.*” Therefore, no conflict is found with the aforementioned regulation, and no special mitigation measure is required to address any potential impacts due to encroachment into the 150 foot riparian setback (See Section 4 – Biological Resources).

Floodplain Regulations – Chapter 16.16 of the Monterey County Code, entitled “*Regulations for Floodplains in Monterey County*,” was adopted to minimize public and private losses due to flood conditions in specific areas through provisions designed:

1. To protect human life and health;
2. To minimize expenditure of public money for costly flood control projects;
3. To minimize the need for rescue and relief efforts associated with flooding;
4. To help maintain a stable tax base by providing for the second use and development of areas of special hazard so as to minimize future blight areas;
5. To insure that potential buyers are notified that property is an area of special flood hazard; and
6. To insure that those who occupy the areas of special flood hazard assume responsibility for their action.

The MCWRA determined in a memo to the PBID, dated April 13, 2005, that three non-standard conditions/mitigation measures would be required for the proposed project in order to avoid conflicts with the requirements of the *Regulations for Floodplains in Monterey County*, which were adopted for the purpose of avoiding or mitigating environmental effects (defined broadly) associated with flooding. These non-standard conditions/mitigation measures are described in the Hydrology and Water Quality Section (Mitigation Measures 9, 10, 11).

Conclusion:

Any potential conflicts with Chapter 16.16 of the Monterey County Code, entitled “*Regulations for Floodplains in Monterey County*,” can be reduced to less-than-significant levels through the implementation of mitigation measures described under Section 8 (Hydrology and Water Quality).

10. 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? (Source: 1, 2, 3, 8)	<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? (Source: 1, 2, 3, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

11. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Source: 1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (Source: 1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Source: 1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Source: 1, 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 expose people residing or working in the project area to excessive noise levels? (Source: 1, 2, 3, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

11. NOISE					
		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:					
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Source: 1, 2, 3, 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

The proposed project may cause a temporary increase in ambient noise levels within the project vicinity due to demolition, construction and grading operations. Potential sensitive receptors include single family residences located nearby. These residences are located roughly 100 feet or more away from proposed development activities. Development activities include operation of graders, backhoes, caterpillars and trucks, which will cause localized noise levels to temporarily increase above existing ambient levels. All development activities will be required to adhere to the County's Noise Control Ordinance (Chapter 10.60 of the Monterey County Code). The project, as designed, will minimize temporary noise impacts by phasing development activities over a 10 month period. A condition of approval will require that the applicant submit a development activity plan to Planning and Building Inspection for review and approval. This plan will be required to include measures to minimize development activity impacts to adjoining residences in accordance with the County's Noise Control Ordinance.

Conclusion:

Therefore, the project will have a less-than-significant impact on temporary ambient noise levels within the project vicinity and special mitigation measures will not be required.

12. POPULATION AND HOUSING					
		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Induce substantial 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)? (Source: 1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

13. PUBLIC SERVICES

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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? (Source: 1, 3) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) | Police protection? (Source: 1, 3) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) | Schools? (Source: 1, 3) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) | Parks? (Source: 1, 3) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) | Other public facilities? (Source: 1, 2, 3, 4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

14. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- | | | | | | |
|----|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? (Source: 1, 2, 3, 4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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? (Source: 1, 2, 3, 4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Exhibit C
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Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

15. TRANSPORTATION/TRAFFIC				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? (Source: 1, 2, 3, 4, 17, 18)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? (Source: 1, 2, 3, 4, 17, 18)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (Source: 1, 2, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Source: 1, 2, 3, 4, 17, 18)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access? (Source: 1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity? (Source: 1, 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? (Source: 1, 2, 3, 4, 17, 18)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

A Traffic Impact Report was prepared for the subject project by Higgins Associates, dated May 10, 2004. According to this report, there are three intersections of concern related to the proposed project: 1) Highway 1/Carmel Valley Road, 2) Highway 1/Río Road, and 3) Highway 1/Oliver Road. Issues surrounding all three intersections are discussed below under existing and potential cumulative conditions. The Higgins report identified nine proposed projects within the project vicinity for the purpose of estimating cumulative conditions, including minor and standard subdivisions.

Highway 1/Carmel Valley Road Intersection – The Higgins Associates report states that the Highway 1/Carmel Valley Road intersection operates at a Level of Service (LOS) E during the peak PM hour, which is below the County's threshold of LOS C, but that *"the project's impact to the intersection is not considered significant, because the intersection volume/capacity ratio remains unchanged when project generated traffic is added to Background Condition volumes."* In other words, potential traffic impacts to this intersection, as a result of the proposed project, will remain within less-than-significant levels. Nevertheless, the Higgins Associates report recommends that a second northbound lane be added to Highway 1 though the Highway 1/Carmel Valley Road intersection in order to raise the LOS at this intersection from E to C at the PM peak hour for existing conditions. The County's Public Works Department recommends a non-standard condition of approval for the subject project that requires the applicant to pay the County a *pro rata* share of the cost of short-term and long-term improvements to Highway 1. Therefore, no special mitigation measures are required to address any potential traffic impacts to this intersection as a result of the proposed project.

Highway 1/Rio Road Intersection – The Higgins Associates report states that the worst-case LOS would deteriorate from C to D under estimated cumulative conditions. The report states that, *"the addition of a second northbound through lane on Highway 1 north of Rio Road would allow the right turn movement from westbound Rio Road to northbound Highway 1 to be designed as a free-flow right land. With this improvement, the intersection would operate at LOS C during the AM and PM peak hours under Cumulative Conditions."* Since the County's Public Works Department recommends a non-standard condition of approval for the subject project that requires the applicant to pay the County a *pro rata* share of the cost of short-term and long-term improvements to Highway 1, this impact is mitigated to less-than-significant levels.

Highway 1/Oliver Road Intersection – The report also finds that no capacity-related improvements will be necessary for the Highway 1/Oliver Road intersection since even with the proposed project, the LOS for this intersection will remain at or above C for eastbound traffic on Oliver Road.

Sight Distance – The proposed project will not create any traffic-safety hazards, however, the intensification in use that would result from the project will proportionally expose more travelers to an unsafe situation at the intersection of Highway 1 and Oliver Road. The Higgins Associates report states that from the stop sign at this intersection, sight distance looking north is about 300 feet and about 330 feet looking south. According to this report, the stop bar at this intersection is currently about 16 feet from the edge of the southbound Highway 1 travelway. Moving the stop bar to 4 feet from the edge of the southbound Highway 1 travelway would increase sight distance looking north up to the Highway 1/Rio Road intersection and up to 470 feet looking south. The report further states that 605 feet of corner distance is desired from a private driveway with a design speed of 55 miles per hour based on Caltrans standards. Since the project seeks the County's abandonment of the portion of Oliver Road immediately in front of the Carmel River Inn, this portion of Oliver Road would essentially become a private driveway for the Inn. Therefore, in order to provide sufficient corner-sight distance toward the south, the Higgins Associates report recommends the removal of vegetation located on the west side of Highway 1 immediately north of the Carmel River Bridge. In addition, the report recommends the relocation

of the Caltrans road condition sign since this sign partially obstructs sight lines from Oliver Road looking south.

Pedestrian/Bicycle Access – In order to improve opportunities for pedestrian and bicycle traffic between the project vicinity and the Crossroads Shopping Center, the Higgins Associates report recommends that the informal footpath that passes from the project site, under the Carmel River Bridge, and to the Crossroads Shopping Center be formally developed and upgraded. This enhancement would also improve access to the mass transit routes available at the Crossroads Shopping Center. As a condition of approval, the applicant will be required to submit progress reports regarding the development of a formal improvement and upgrading plan for the footpath. This will ensure consistency with Policy 3.1.3.8 of the Carmel Area Land Use Plan, which states that “*development or expansion of visitor-serving facilities should be planned to maximize opportunities for use and/or development of public transportation systems and development of private shuttles.*”

Construction/Grading Traffic – A construction/grading traffic analysis was prepared by Higgins Associates, dated March 23, 2005. According to the analysis, the average total construction/grading traffic generation would be 509 daily vehicle trips, with 55 trips during the AM peak hour and 52 trips during the PM peak hour. In order to reduce peak hour construction/grading traffic generation to a less-than-significant level, the analysis recommends a mitigation measure that will ensure that trips generated by these activities will avoid, to the greatest extent possible, the AM and PM peak commute periods.

Conclusion:

In general, the Traffic Impact Report prepared for the proposed project found that a second northbound lane should be added to Highway 1 though the Highway 1/Carmel Valley Road intersection in order to raise the LOS at this intersection from E to C at the PM peak hour for existing conditions as well as for potential cumulative conditions. However, the report found that no capacity improvements were warranted by the project itself, since even under cumulative conditions, project traffic would represent only 0.55% of estimated cumulative conditions for the worst peak-hour volume at the Highway 1/Rio Road intersection. Nevertheless, the report also recommends that this percentage “*should be the basis for the project’s contribution toward the improvements necessary to provide a free right-turn lane from westbound Río Road to northbound Highway 1,*” and that “*the project should contribute a pro-rata share towards planned long-range improvements for Highway 1.*”

The report also found that sight-distance improvements should be made for eastbound traffic on Oliver Road at the Highway 1 intersection. These improvements involve improving corner sight distance by moving the stop bar to 4 feet from the southbound Highway 1 travelway, clearing the vegetation between Oliver Road and the Carmel River Bridge, and relocating the Caltrans road condition sign to south of the Carmel River Bridge or north of Oliver Road. Implementation of these measures will reduce any potential traffic impacts to less-than-significant levels.

In addition, the report found that the informal footpath passing from the project site, under the Carmel River Bridge, and to the Crossroads Shopping Center should be formally developed and

upgraded in order to support pedestrian and bicycle traffic between the project vicinity and the Crossroads Shopping Center. This will also improve access to mass transit opportunities at the shopping center. As a condition of approval, the applicant will be required to submit progress reports regarding the development of a formal improvement and upgrading plan for the footpath.

In order to reduce peak hour construction/grading traffic generation to a less-than-significant level, the construction/grading traffic analysis recommends a mitigation measure that will ensure that trips generated by these activities will avoid, to the greatest extent possible, the AM and PM peak commute periods.

Mitigations:

***Mitigation Measure 12** – In order to reduce potential cumulative traffic impact to less-than-significant levels at the Highway 1/Río Road intersection, the applicant shall contribute toward the improvements necessary to provide a free right-turn lane from westbound Río Road to northbound Highway 1 based on the estimated 0.55% of traffic generated by the proposed project under estimated cumulative conditions.*

***Monitoring Action 12** – Prior to issuance of grading or building permits, the applicant shall pay a fee to be determined by the Public Works Department for improvements necessary to provide a free right-turn lane from westbound Río Road to northbound Highway 1 based on the estimated 0.55% of traffic generated by the proposed project under estimated cumulative conditions.*

***Mitigation Measure 13** – In order to reduce potential safety hazards at the intersection of Highway 1 and Oliver Road to less-than-significant levels by improving corner-sight distances, the stop bar shall be moved to 4 feet from the southbound Highway 1 travelway, the vegetation between Oliver Road and the Carmel River Bridge shall be cleared, and the Caltrans road condition sign shall be relocated either south of the Carmel River Bridge or north of Oliver Road.*

***Monitoring Action 13.A** – Prior to issuance of grading or building permits, the applicant shall solicit from either Caltrans or the Monterey County Public Works Department, as applicable, a memorandum of agreement that the agency with jurisdiction will carry out the work required by Mitigation Measure 13 prior to final inspection of the Combo Units.*

***Monitoring Action 13.B** – Prior to issuance of grading or building permits, the applicant shall provide the Planning and Building Inspection Department with a copy of a signed memorandum of agreement explicitly guaranteeing that the agency with jurisdiction will carry out the work required by Mitigation Measure 13 prior to final inspection of the Combo Units.*

***Mitigation Measure 14** – In order to reduce peak hour construction/grading traffic generation to a less-than-significant level, the applicant shall arrange for construction/grading activities to begin by 7:00 AM and end by 3:30 PM. Deliveries to the construction site shall occur between 9:00 AM and 4:00 PM only.*

***Monitoring Action 14** – During construction and grading operations, the applicant shall submit monthly reports that include the daily truck trip log showing travel times to the Director of*

Planning and Building Inspection for review and approval. The contractor shall submit a signed certification to contain an "under penalty of perjury" clause. Failure to comply shall cause revocation of permit.

16. UTILITIES AND SERVICE SYSTEMS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Source: 1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Source: 1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Source: 1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Source: 1, 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste? (Source: 1, 2, 3, 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion:

See previous Sections II. A (*Project Description*) and B (*Environmental Setting*) and Section IV. A (*Environmental Factors Potentially Affected*), as well as the sources referenced.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

NOTE: If there are significant environmental impacts which cannot be mitigated and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to 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, 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? (Source: 1, 3, 4, 8, 10, 11)	<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)? (Source: 1, 3, 4, 8, 9, 10, 11, 13, 16, 17, 18, 19, 20, 21)	<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? (Source: 1, 16, 17, 18, 19, 20, 21)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion/Conclusion:

Mitigation Measures are proposed to address potentially significant impacts related to historic resources, liquefaction, flooding and traffic. These mitigation measures are discussed in the cultural resources, geology/soils, hydrology/water quality and transportation/traffic sections of the initial study checklist (Section VI – Environmental Checklist). The same mitigation measures also address potentially significant impacts described in Section VII – Mandatory Findings of Significance. Implementation of these mitigation measures will reduce all impacts to a less-than-significant level.

VIII. FISH AND GAME ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

For purposes of implementing Section 735.5 of Title 14, California Code of Regulations: If based on the record as a whole, the Planner determines that implementation of the project described herein, will result in changes to resources A-G listed below, then a **Fish and Game Document Filing Fee** must be assessed. Based upon analysis using the criteria A-G, and information contained in the record, state conclusions with evidence below.

- A) Riparian land, rivers, streams, water courses, and wetlands under state and federal jurisdiction.
- B) Native and non-native plant life and the soil required to sustain habitat for fish and wildlife;
- C) Rare and unique plant life and ecological communities dependent on plant life, and;
- D) Listed threatened and endangered plant and animals and the habitat in which they are believed to reside.
- E) All species of plant or animals listed as protected or identified for special management in the Fish and Game Code, the Public Resources Code, and the Water Code, or regulations adopted thereunder.
- F) All marine terrestrial species subject to the jurisdiction of the Department of Fish and Game and the ecological communities in which they reside.
- G) All air and water resources the degradation of which will individually or cumulatively result in the loss of biological diversity among plants and animals residing in air or water.

De minimis Fee Exemption: For purposes of implementing Section 735.5 of the California Code of Regulations: A *De Minimis Exemption* may be granted to the **Environmental Document Fee** if there is substantial evidence, based on the record as a whole, that there **will not** be changes to the ~~above-named resources V. A-G caused by implementation of the project. Using the above criteria,~~ state conclusions with evidence below, and follow Planning and Building Inceptions Department Procedures for filing a de minimis exemption.

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

Evidence: The amount of grading, site disturbance and habitat disturbance associated with the project will potentially cause changes to the resources in criteria A-G shown above. See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

Exhibit C
Page 45 of 97 Pages

IX. REFERENCES

1. Project Application and Plans in file PLN030646/Carmel River Inn.
2. *Monterey County General Plan.*
3. *Carmel Area Land Use Plan.*
4. *Regulations for Development in the Carmel Area Land Use Plan.*
5. Title 20 of the Monterey County Code (Zoning Ordinance).
6. *CEQA Air Quality Guidelines*, Monterey Bay Unified Air Pollution Control District, Revised September 2002.
7. Site visit conducted by project planner on May 13, 2005.
8. Planning & Building Inspection Department's Geographic Information System.
9. *Preliminary Archaeological Reconnaissance for the Proposed New Construction Area on Assessor's Parcel 009-563-005 in Carmel, Monterey County, California*, prepared by Mary Doane, B. A., and Trudy Haversat, M. A., RPA, of Archaeological Consulting, Inc., dated March 5, 2004.
10. *Carmel River Inn / Biological Survey & Assessment*, prepared by Jeffery B. Froke, Ph.D., of California Wildlife Ecology, dated January 13, 2004.
11. *Carmel River Inn / Amendment*, prepared by Jeffery B. Froke, Ph.D., of California Wildlife Ecology, dated January 21, 2004.
12. *Forest Management Plan for New Combo Units at: APN 009-563-00[5], Carmel River Inn*, prepared by Glenn C. Flamik of Forest City Consulting, dated May 7, 2004.
13. *Historical and Architectural Evaluation for the Carmel River Inn*, prepared by Kent L. Seavey, Preservation Consultant, dated April 1, 2004.
14. *Preliminary Geologic Investigation, Central Area of the Carmel River Inn Property*, prepared by D&M Consulting Engineers, Inc., dated March 11, 2004.
15. *Liquefaction Study, Proposed Carmel River Inn Expansion*, prepared by D&M Consulting Engineers, Inc., dated November 24, 2004.
16. *Summary of Hydraulic Modeling for the Carmel River Inn, County of Monterey*, prepared by Balance Hydrologics, Inc., dated July 23, 2004 and letter from Whitson Engineers, dated July 22, 2004.
17. *Carmel River Inn Master Plan Traffic Impact Report*, prepared by Higgins Associates, Civil & Traffic Engineers, dated May 10, 2004.
18. *Carmel River Inn Traffic Impacts During Construction*, prepared by Higgins Associates, Civil & Traffic Engineers, dated March 23, 2005.
19. *Liquefaction Mitigation, Proposed Carmel River Inn Expansion*, prepared by D&M Consulting Engineers, Inc., dated January 5, 2005.

20. *Stone Column Foundation, Proposed Carmel River Inn Expansion*, prepared by D&M Consulting Engineers, Inc., dated March 15, 2005.
21. *Liquefaction-Induced Displacements, Proposed Carmel River Inn Expansion*, prepared by D&M Consulting Engineers, Inc., dated March 16, 2005.

X. ATTACHMENTS

- A. Project Plans
- B. Vicinity Map

CARMEL
RIVER INN
U.S. HIGHWAY 1
@ CARMEL RIVER BRIDGE
P.O. BOX 271609
CARMEL, CA 93922
APN: 009-500-00

PHASE I
MASTER PLAN

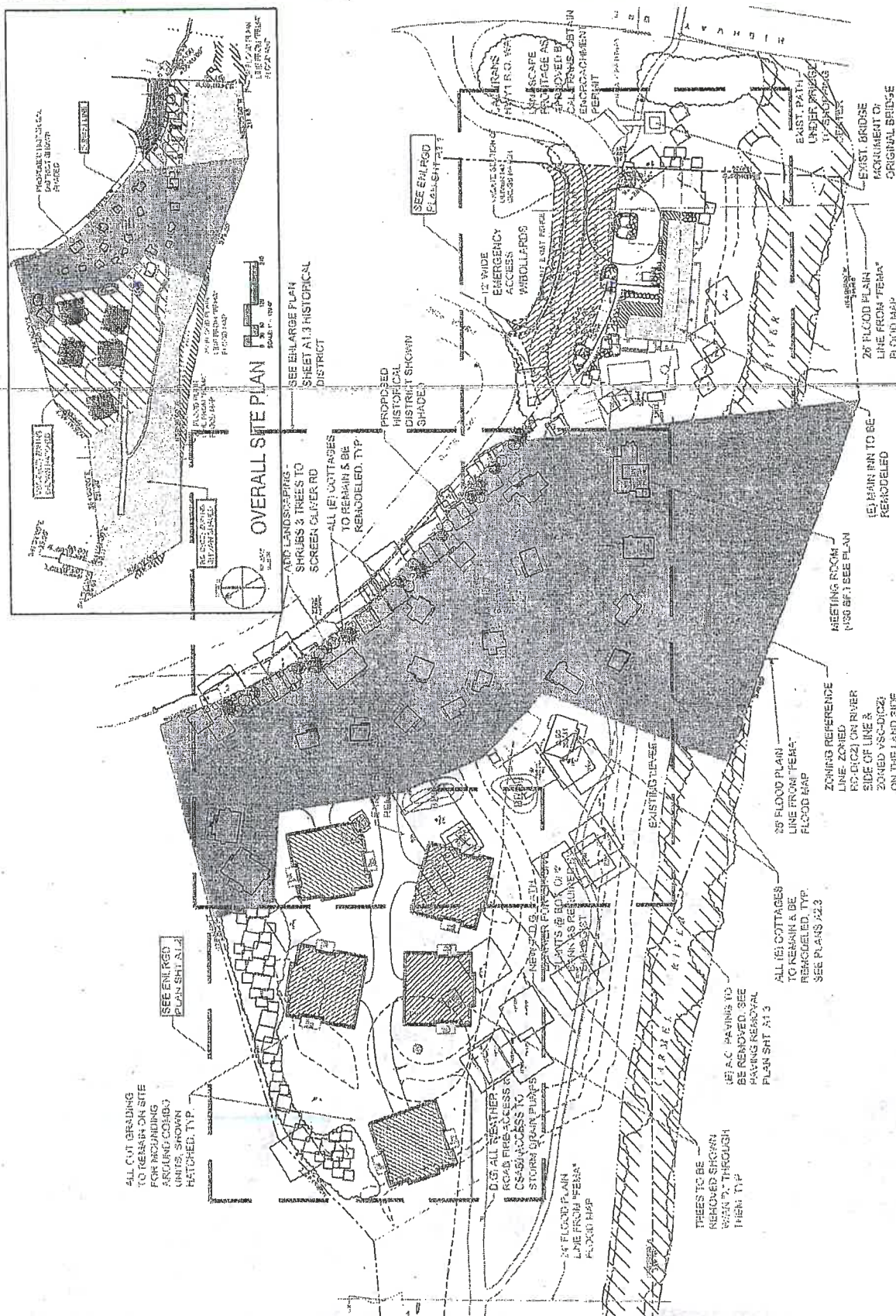
**THE
PAUL DAVIS
PARTNERSHIP
ARCHITECTS & PLANNERS**

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DATE: 3/6/97
MASTER
SITE PLAN

A1.0



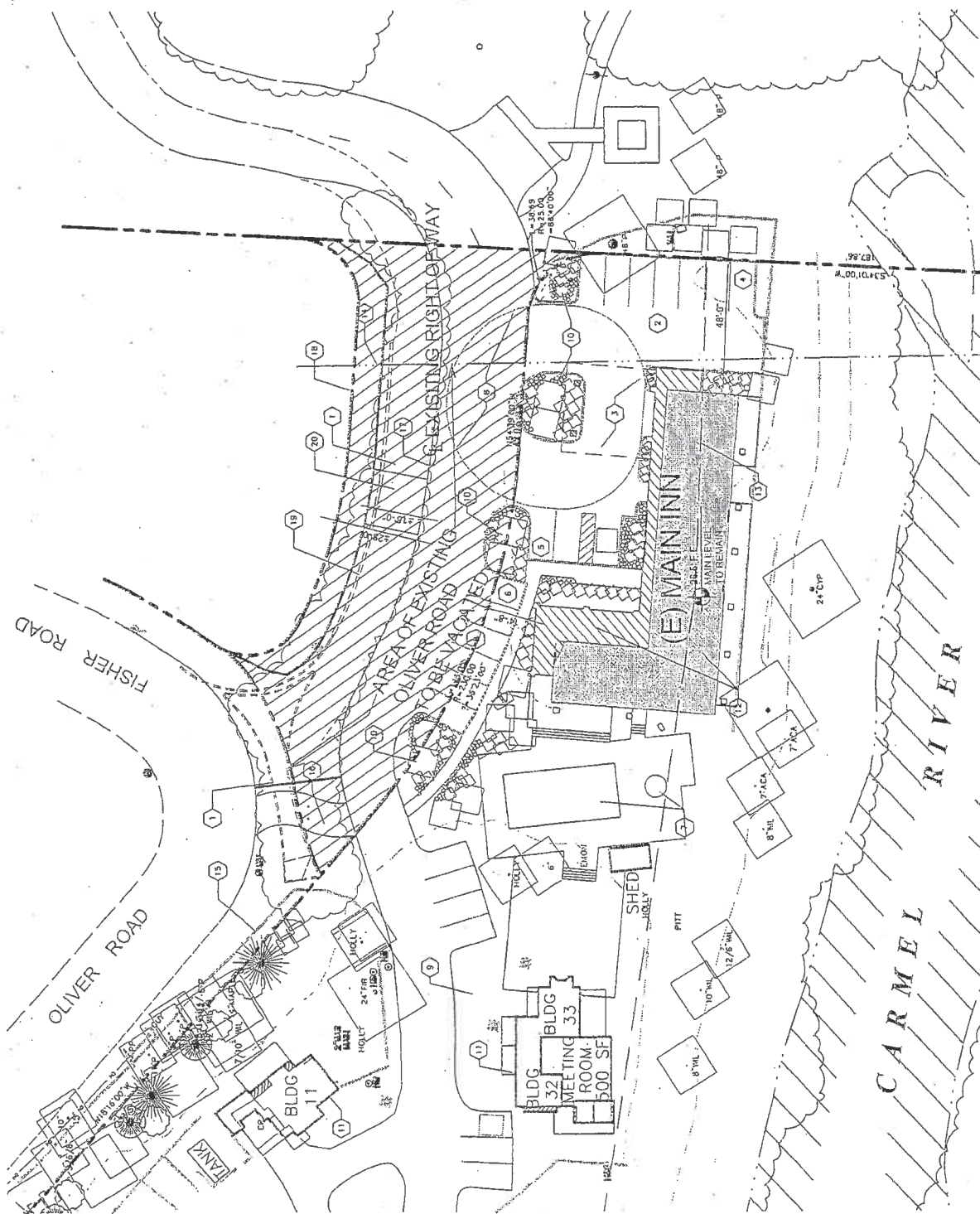
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 4. 职业: 5. 学历: 6. 婚姻状况:
 7. 联系电话: 8. 电子邮箱:
 9. 联系地址: 10. 邮政编码:
 11. 身份证号: 12. 银行卡号:
 13. 支付宝账号: 14. 微信账号:
 15. 其他信息:

MASTER SITE PLAN



SHEET NOTES

1. REMOVE 6" A.C. PAVING & CURB ISLAND & REPAVE WITH ASPHALT
2. NEW 6" A.C. PAVING PARKING LOT
3. NEW PORTE COCHERE
4. 7 GUEST PARKING SPACES
5. 3 GUEST PARKING SPACES
6. 6 GUEST PARKING SPACES
7. (1) POOL TO REMAIN W/ NEW POOL TERRACE & SPA
8. EXPOSED CONC. PAVEMENT CIRCULAR DRIVE
9. RESURF PORTION OF (2) DRIVEWAY PER PAVING REMEDIAL PLAN (P.C. 12.3)
10. NEW LANDSCAPING SEE LANDSCAPING PLAN(S)
11. (1) COTTAGE TO REMAIN SHOWING SHED, TYP.
12. (1) PORTION OF LAMINATE STONE/SL STAINED, NEW PORTION SHOWN MATCHED
13. ZONING MAP LINE, SEE SHEET 12.6 FOR DIFFERENT ZONE
14. "TERRACE" 18" x 8" FLOOR PLAN LINE
15. (1) FENCE TO REMAIN
16. FROSTLINE VALUATION/ACCESS
17. (1) CONCRETE OF GUESTS LOBBY PORTE, COUNTRY AND 10' WIDE ROAD CASEMENT CENTERED ON THIS LINE & PROPOSED NEW EDGE OF PAVING
18. NEIGHBORS PROPERTY LINE
19. (1) EDGE OF PAVING FOR GUEST ROAD
20. JANUARY (1) (1) EDGE OF FENCE 2' DATE, PAVE NEW DRIVEWAY ACCESS TO NEW DRIVEWAY, 10' WIDE ROAD CASEMENT CENTERED ON THIS LINE & PROPOSED NEW DRIVEWAY & FENCE



ENLARGED HOTEL SITE PLAN

LEGEND:
 [Solid Black] EXISTING BUILDINGS
 [Hatched] ADDITIONS OR NEW BUILDINGS

Scale: 1" = 10'

CARMEL RIVER INN
 U.S. HIGHWAY 1
 89 CARMEL RIVER BRIDGE
 P.O. BOX 221009
 CARMEL, CA 95009
 APRIL 2001 00-00

PHASE I MASTER PLAN

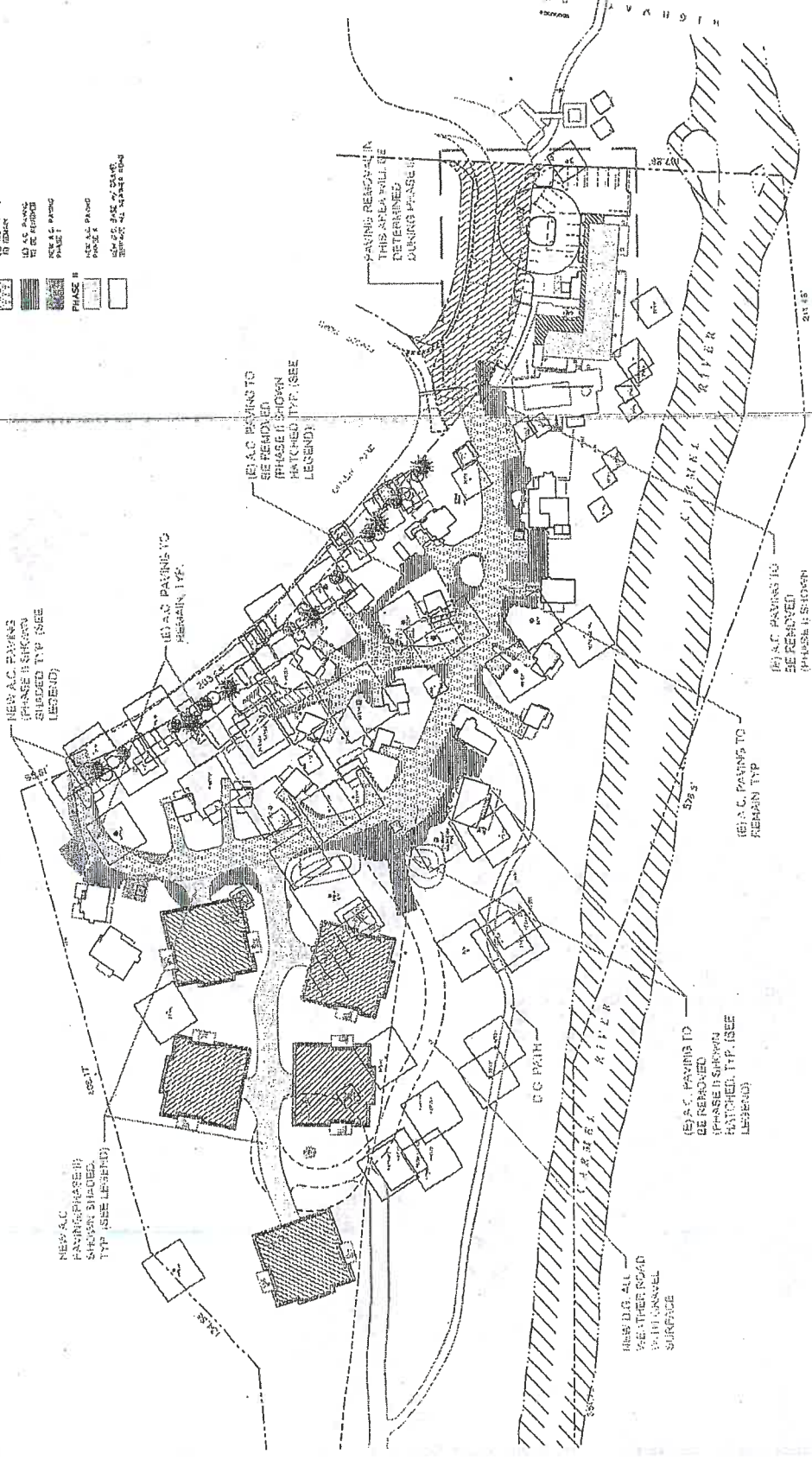
THE PAUL DAV PARTNERSHIP
 ARCHITECTS & PLANNERS

SITE PLAN
ENLARGED
MAIN INN

A 1.1

PAVING LEGEND

PHASE I	TO AS PAVING TO IDENTITY
NEW A.C. PAVING TO BE REMOVED PHASE I	NEW A.C. PAVING TO BE REMOVED PHASE I
PHASE II	NEW A.C. PAVING TO BE REMOVED PHASE II
NEW A.C. PAVING TO BE REMOVED PHASE II	NEW A.C. PAVING TO BE REMOVED PHASE II



MASTER PAVING PLAN
1" = 20'



CARMEL
RIVER INN
U.S. HIGHWAY 1
@ CARMEL RIVER BRIDGE
P.O. BOX 321669
CARMEL, CA 93922
APN: 009-563-03

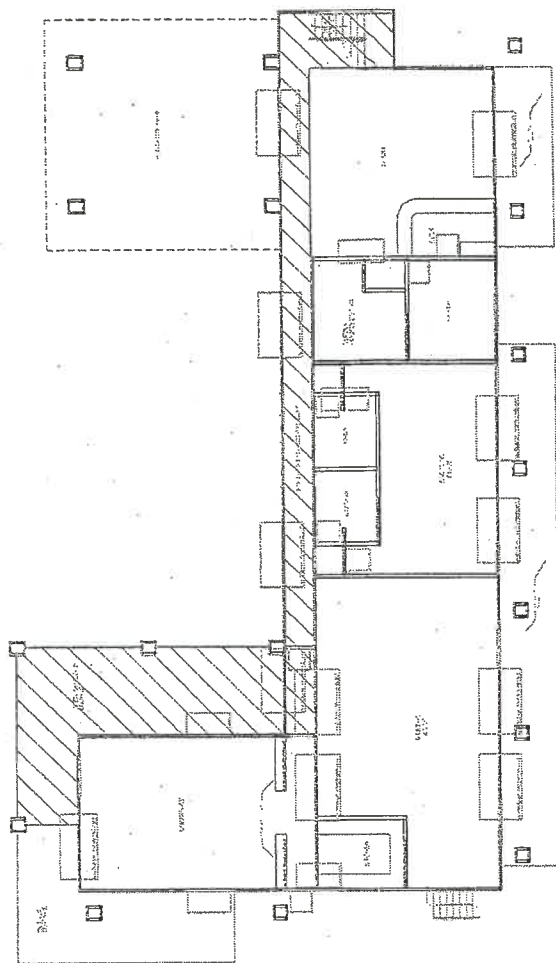
**THE
PAUL DAVIS
PARTNERSHIP**
ARCHITECTS & PLANNERS
P.C.

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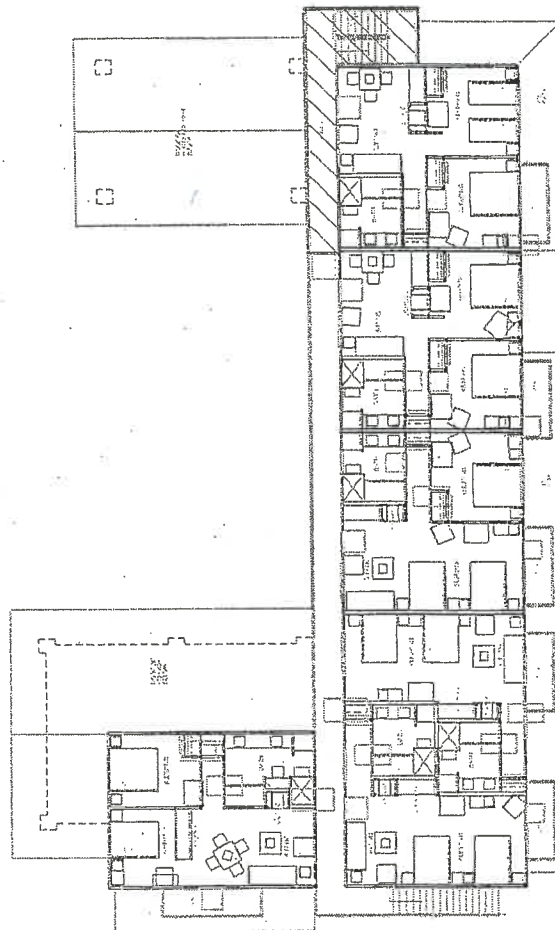
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MAIN INN
FLOOR PLANS

2008-09-01

A2.1



MAIN IN-MAN LEVEL FLOOR PLAN



MAIN INN-UPPER LEVEL FLOOR PLAN

**CARMEL
RIVER INN**
U.S. HIGHWAY 1
@ CARMEL RIVER BRIDGE
P.O. BOX 221003
CARMEL, CA 93922
APN: 016-583-02

**THE
PAUL DAVI
PARTNERSHI
ARCHITECTS**

3400 LAMAR AVENUE, SUITE 200
SAN JOSE, CALIFORNIA 95128
PHONE: (408) 948-1000
FAX: (408) 948-1001
WWW.PAULDAVI.COM

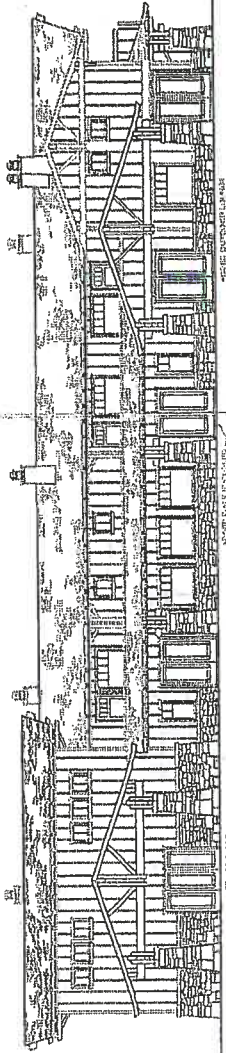
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Project: Carmel River Inn
Project No.: 016-583-02
Project Name: Carmel River Inn
Project Location: Carmel, CA
Project Date: 7/2/2006

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Date: 7/2/2006
Drawn By: J. Davi
Checked By: J. Davi
Project No.: 016-583-02

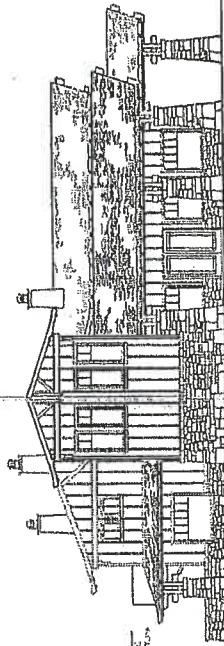
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Sheet Number

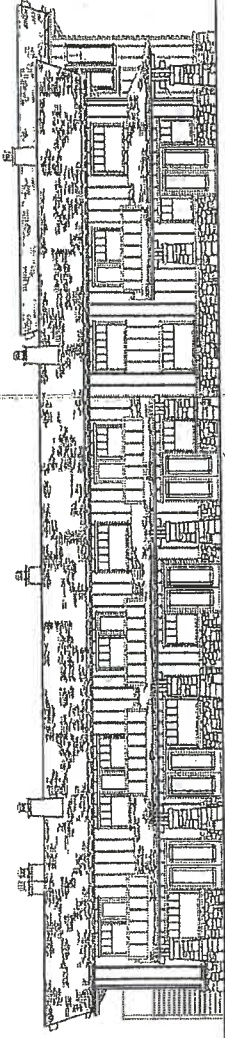
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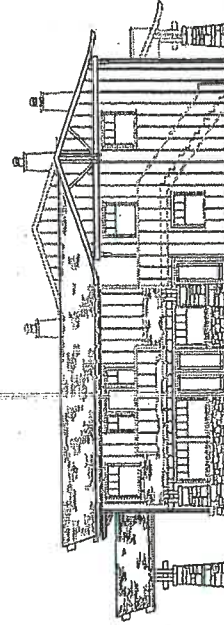
NORTH ELEVATION



EAST (HWY 1) ELEVATION



SOUTH ELEVATION

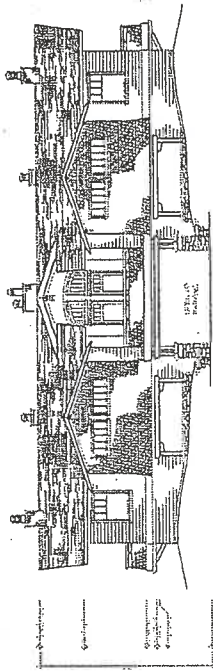


WEST ELEVATION

MAIN INN ELEVATIONS

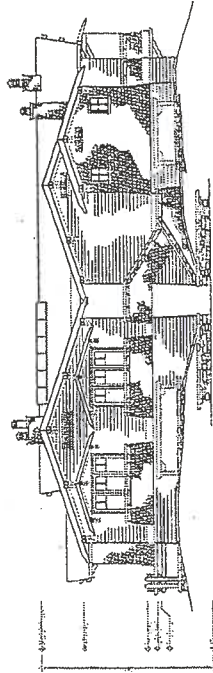
CARMEL
RIVER INN
135 CARMEL RIVER BRIDGE
P.O. BOX 221859
CARMEL, CA 93922
APR 09 09:55:03

THE
PAUL DAVIS
PARTNERSHIP
ARCHITECTS & PLANNERS
3000 AVENUE 100, SUITE 100
CARMEL, CA 93922
TEL: 831.923.1100 FAX: 831.923.1101
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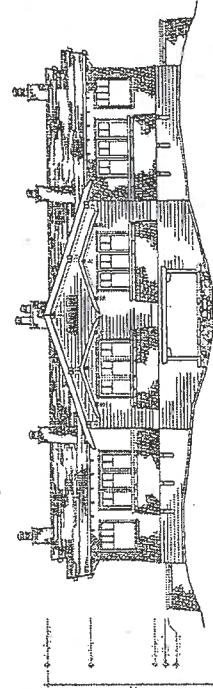
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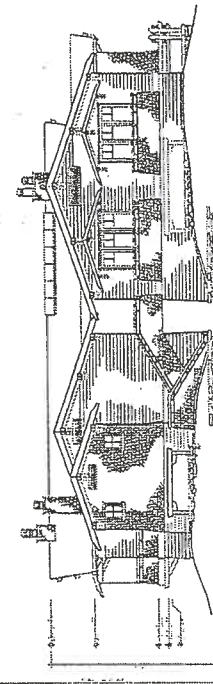
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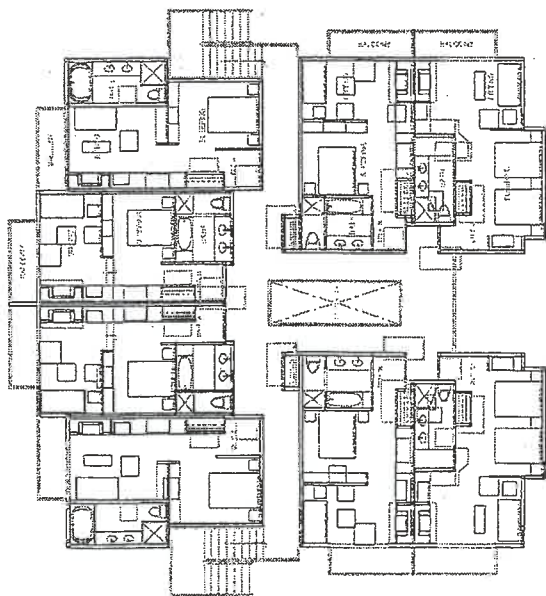
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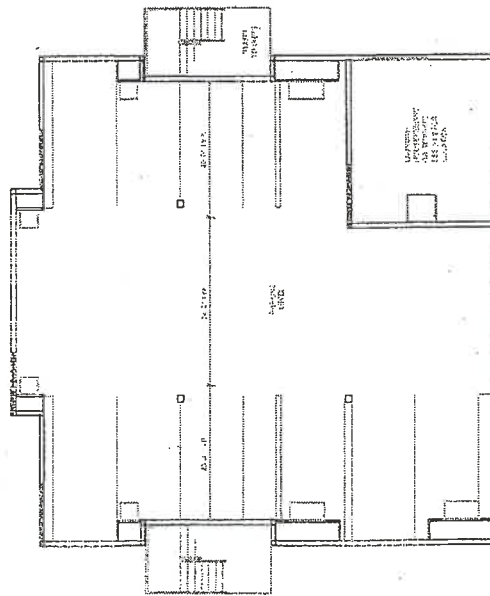
WEST ELEVATION

SCALE: 1/8" = 1'-0"



FLOOR PLAN - MAIN LEVEL-UNIT-3

SCALE: 1/8" = 1'-0"



FLOOR PLAN - GARAGE-UNIT-3

SCALE: 1/8" = 1'-0"

Project No.	2007
Client Name	PAUL DAVIS
Project Name	CARMEL RIVER INN
Project Location	CARMEL, CA
Project Status	ARCHITECTURAL
Project Date	APR 09 09:55:03

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FLOOR PLANS &
EXT. ELEVATIONS
COMBO UNITS

A 2.2

Sheet 7 of 10

CARMEL
RIVER INN
U.S. HIGHWAY 1
CARMEL, CALIF. 95006
CARMEL, CA 95006
APN 009-053-00

THE
PAUL DAVIS
PARTNERSHIP
ARCHITECTS
10000 N. 100th St., Suite 100
Seattle, WA 98154

DATE: 10/1/88
SHEET: 7
PROJECT: 10000 N. 100th St., Suite 100
CARMEL, CA 95006

PAUL DAVIS
PARTNERSHIP
ARCHITECTS
10000 N. 100th St., Suite 100
Seattle, WA 98154

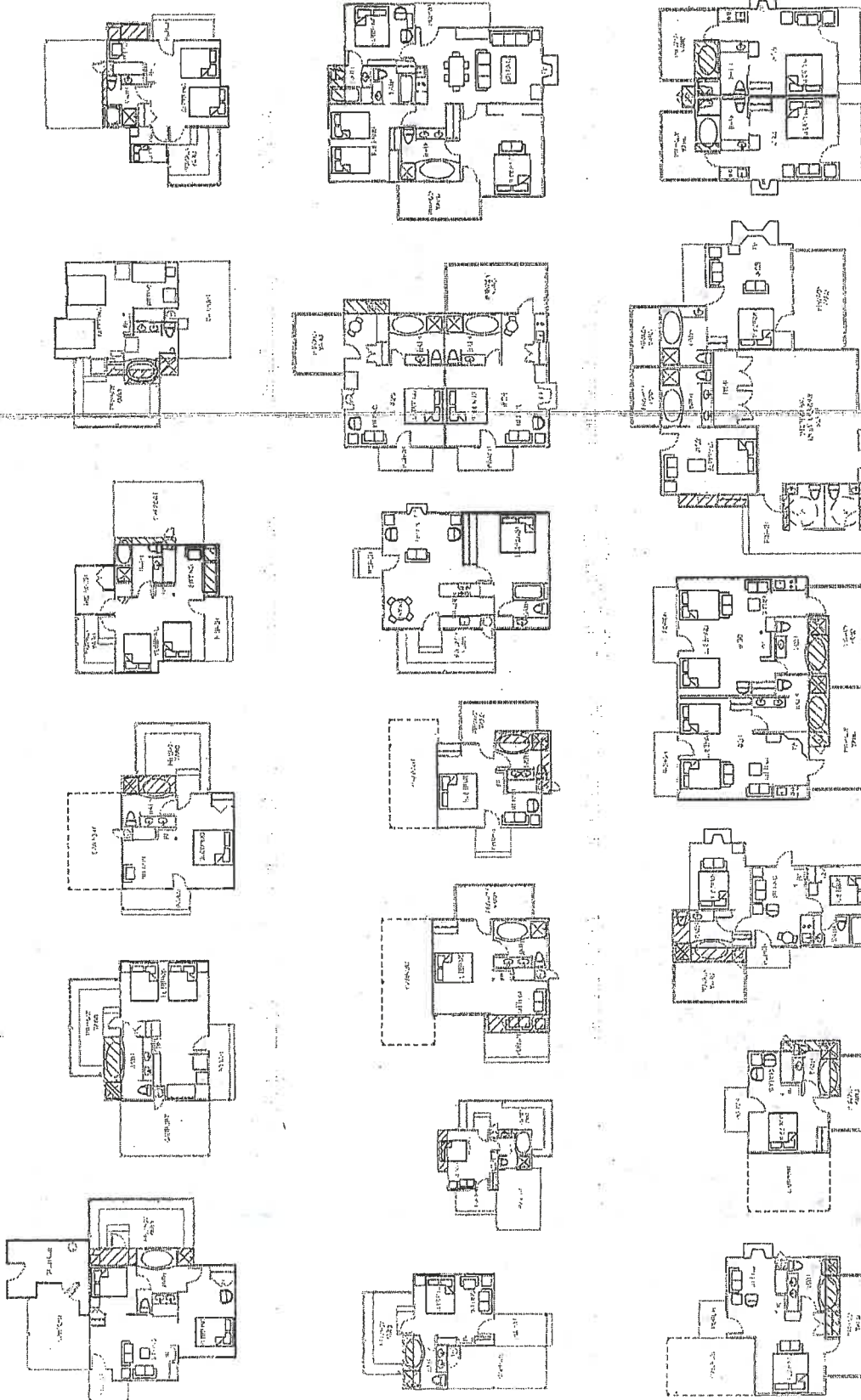
PAUL DAVIS
PARTNERSHIP
ARCHITECTS
10000 N. 100th St., Suite 100
Seattle, WA 98154

PAUL DAVIS
PARTNERSHIP
ARCHITECTS
10000 N. 100th St., Suite 100
Seattle, WA 98154

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10000 N. 100th St., Suite 100
Seattle, WA 98154

PAUL DAVIS
PARTNERSHIP
ARCHITECTS
10000 N. 100th St., Suite 100
Seattle, WA 98154

A 2.3



UNITS: FEET
SCALE: 1/8" = 1'-0"

**CARMEL
RIVER INN**
U.S. HIGHWAY 1
1000 CARMEL RIVER BRIDGE
P.O. BOX 221609
CARMEL, CA 93922
FAX: 009-563-03

**THE
PAUL DAVIS
PARTNERSHIP
ARCHITECTS & PLANNERS**

Frame B ₂	RELUT	5.5-08
Training Sites		
Index Dates		
Date Interval for Spatial Aggregation		
Simulation		

**COTTAGES
FLOOR PLANS**

Study Materials

A 2.4



UNIT 13



UNIT 15



UNITS 20&21



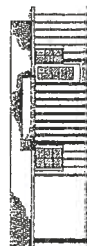
UNIT 14



JNIT 16



UNIT 19



UNIT 14



UNIT 16

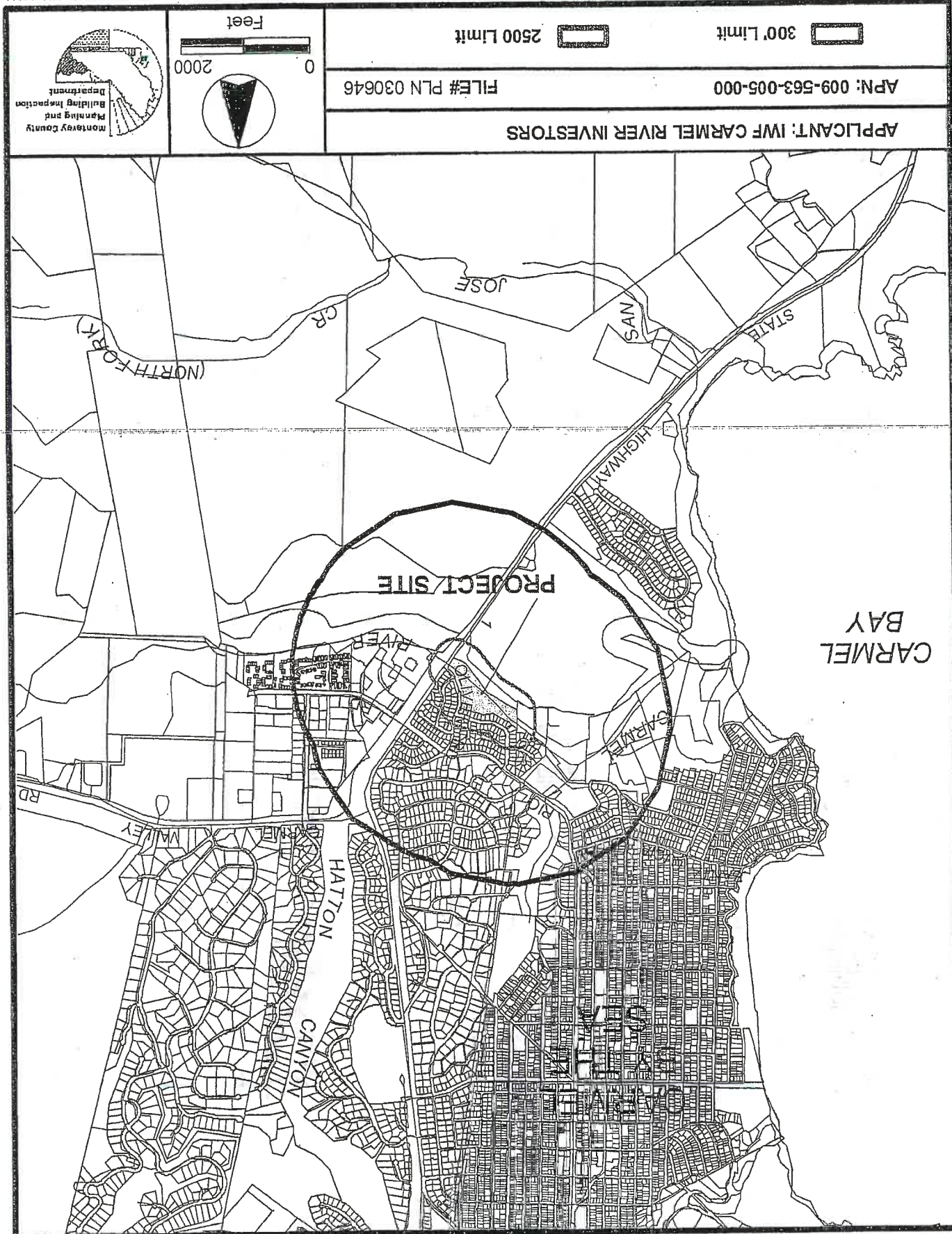


UNIT 19



COTTAGES ELEVATIONS

NOV 15 1972



February 3, 2016
Via Email

Joy Berry
Carmel Inn Ventures, LLC
P.O. Box 1796
Carmel, CA 93924
joy@joyberry.org

Subject: Discussion of California Red-Legged Frog within the Biological Site Assessment Letter for the Carmel River Inn Project (File Number: PLN150378)

Dear Ms. Berry:

This letter is intended to address the County of Monterey's (County) comments in their *Carmel River Inn (PLN150378): Project Status (884 Deadline)* email to you dated January 20, 2016, and specifics discussed in LSA Associates, Inc.'s (LSA) *Biological Site Assessment at the Carmel River Inn, Monterey County, California* pertaining to California red-legged frog (*Rana draytonii*).

To clarify, other than the list of special-status species occurring within three miles of the project site in Table A of LSA's biological report, there is no discussion of California tiger salamander (*Ambystoma californiense*) because the project site and adjacent areas do not provide suitable habitat for this species. Therefore, no impacts to California tiger salamander are anticipated as a result of this project. The presence of California red-legged frogs is discussed in the biological site assessment report and California red-legged frogs, like California tiger salamanders in Monterey County, are listed under the federal Endangered Species Act as threatened species. Beyond the same listing status, California red-legged frog and California tiger salamanders are very different organisms with very different life histories and habitat requirements. LSA's report includes an embedded Habitat Assessment discussing the project site and surrounding habitats' potential to support California red-legged frog.

As detailed in the biological site assessment, the project site does not provide suitable habitat to support a population of California red-legged frogs, and impacts to California red-legged frogs are not anticipated as a result of this project. The project site is a highly-disturbed area currently used for maintenance and storage purposes associated with the existing Carmel River Inn development. California red-legged frog are presumed present (based on past observations) in the aquatic and riparian areas associated with the Carmel River which are adjacent to the project site, but outside the project limits. LSA did not conduct, nor do we recommend conducting, protocol-level surveys because California red-legged frogs are already known to be present in and along the river (which we are already assuming), and negative survey results would not likely be accepted by the USFWS as evidence of their absence in light of the past occurrence records.

Because California red-legged frogs may move long distances from aquatic breeding/rearing/foraging habitat in search of other suitable aquatic habitats, there is a chance, albeit highly unlikely, that a dispersing California red-legged frog could occur within the project site occasionally (e.g., during wet weather). Therefore, the following recommendations are included for planning and constructing the project in order to avoid impacts to California red-legged frog:

- A 150-foot setback from the Carmel River is required. The project site is adjacent to the Carmel River, which is a perennial stream and a designated Environmentally Sensitive Habitat Area. The existing project limits are not within the river or its associated riparian corridor. However, the project limits should be established and delineated by construction personnel.
- Construction activities should occur during the dry season and outside of the California red-legged frog breeding season (January 1 through June 30) when California red-legged frogs are not as likely to be found away from water or are unlikely to be actively dispersing.
- A qualified biologist should conduct a preconstruction survey for California red-legged frogs within 14 days prior to the start of construction with a follow-up survey conducted within 24 hours prior to the start of construction.
- A qualified biological monitor should be on site during the initial ground disturbance activities (e.g., site clearing and grading) to ensure that California red-legged frogs are not present during this phase of construction. Periodic monitoring may be needed thereafter.
- If fencing or other barriers are to be installed prior to ground disturbance at the limits of setbacks around the project site, the biological monitor will oversee this installation. Fencing is another measure used to keep species such as California red-legged frogs from entering the project site during construction.

LSA's report contains a more detailed habitat assessment for California red-legged frogs, the project site, and adjacent habitats. Based on a reconnaissance of the site, existing site conditions, existing occurrence records, and development plans for the site, there is a low likelihood for California red-legged frogs to occur on the project site. Implementation of the avoidance measures is expected to avoid impacts to California red-legged frogs.

Sincerely,

LSA ASSOCIATES, INC.



Matt Willis
Senior Biologist



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IRVINE
PALM SPRINGS

PT. RICHMOND
RIVERSIDE
ROCKLIN

November 30, 2015

Joy Berry
Carmel Inn Ventures, LLC
P.O. Box 1796
Carmel, California 93924

Subject: Biological Site Assessment at the Carmel River Inn, Monterey County, California
(APN: 009-563-005) (File Number: PLN150378)

Dear Ms. Berry:

This letter report describes LSA Associates, Inc.'s (LSA) assessment of the above-referenced project site, including the biological resources record search, survey methods and results, and preliminary recommendations.

INTRODUCTION

At your request, and per the County of Monterey's (County) Application Checklist for the subject project, LSA conducted a biological site assessment of the proposed expansion area of the Carmel River Inn at 26600 Oliver Road (project site), southeast of the City of Carmel-by-the-Sea (City) in unincorporated Monterey County, California (see Figures 1 and 2; all figures attached).

The Carmel River Inn is an existing hotel complex located adjacent to the Carmel River. Currently, the Inn is planning to expand by adding approximately 22 RV park models. Infrastructure proposed to support these units includes the construction of roadways, water lines, sewer lines, and electrical and storm water improvements. The area proposed for the expansion is west of and adjacent to the existing Inn. The project has been designed to avoid tree removal by beneficially incorporating the trees into the project landscaping.

This letter is not intended to be a formal biological resource assessment for the County. Rather, this is a preliminary effort to update the on-site conditions as described in a 2004 Biological Assessment and to address biological concerns pertaining to the proposed project (e.g., special-status botanical resources and California red-legged frog [*Rana draytonii*; CRLF]) so they can be discussed early in the planning process with the County.

REGIONAL SETTING

The approximately 2.5-acre project site (within the larger 10.83-acre project parcel) is on privately owned land located on the *Monterey, California* 7.5-minute United States Geological Survey (USGS) topographic quadrangle map. The project site is west of State Route 1 (SR-1) and immediately west of the existing access roads within the Carmel River Inn complex. The project site is a relatively flat

floodplain with several large trees. The site is bordered to the north by existing residential uses along Mission Fields Road, to the west and south by existing flood control berms associated with the Carmel River, and to the east by the existing Inn complex.

The project site is located within the planning area of the Carmel Land Use Plan (CLUP) within a designated "Commercial – Recreation & Visitor-serving" area. Located within the California Coastal Commission-designated Coastal Zone, the project site is also subject to policies and regulations under Part 4 of the Coastal Implementation Plan (CIP). Due to the presence of rare, endangered, or threatened species and their habitats, the Carmel River and its associated riparian corridor (approximately 125 feet and 40 feet, respectively, south and west of the project site) is considered an Environmentally Sensitive Habitat Area (ESHA). The project site is also situated between the Mission Ranch and Hodges Special Treatment Areas to the northwest and the Odello Special Treatment Area to the southeast. The project site is not within an ESHA or Special Treatment Area, but would be considered adjacent and therefore subject to some general and specific policies of the CLUP and CIP (see Impact Assessment and Management Recommendations for Development section below).

LOCAL VEGETATION

Methodology

Prior to conducting the site assessment, LSA Senior Biologist Matt Willis queried the California Natural Diversity Database (CNDDDB) *Rarefind* 5.0 (California Department of Fish and Wildlife [CDFW] 2015) program and the California Native Plant Society's (CNPS) *Electronic Inventory of Rare and Endangered Plants* to search for potentially occurring special-status species within 3 miles of the project site. Critical Habitat maps were reviewed utilizing the United States Fish and Wildlife Service (USFWS) Critical Habitat Mapper (USFWS 2015) to determine whether any critical habitat has been designated within the project site. For the purpose of this report, special-status species are those plants and animals listed, proposed for listing, or candidate for listing as threatened or endangered under the Federal Endangered Species Act (FESA); those listed or proposed for listing as rare, threatened, or endangered by the California Endangered Species Act (CESA); animals designated as State Species of Special Concern (SSC) or State fully protected (FP); plants with California Rare Plant Ranks (CRPRs) of 1, 2, 3, or 4 as designated by CDFW and CNPS; and other locally rare species (see Table A, attached).

Mr. Willis conducted a reconnaissance-level pedestrian survey of the entire project site and the surrounding section of the Carmel River and its associated riparian corridor on October 27, 2015, between 1200 and 1600 hours. The weather during the survey was overcast, with temperatures ranging from approximately 68 to 70 degrees Fahrenheit and winds approximately 0 to 5 miles per hour. LSA Associate Biologist Eric Lichtwardt also visited the project site on November 1, 2015, to further assess the potential for CRLF to occur. Representative photographs of the project site and its surroundings are attached.

Due to the project schedule, it was not possible to conduct the field survey during the optimum survey period for all of the special-status plant and wildlife species known to occur in the region. Therefore, the field survey documented the general conditions and habitats present within and around the project site to assess the likelihood of occurrence of special-status plant or wildlife species (that may be a

constraint to future development) based on the presence of suitable habitat and other natural history elements that might predict their occurrence. Subsequent management recommendations are made to further refine the assessment or to be implemented as impact avoidance measures.

Vegetation/Habitat

The 2.5-acre project site is situated on relatively flat ground with elevations ranging from approximately 17 to 22 feet above mean sea level. This area is associated with the floodplain of the Carmel River; however, several earthen berms installed as flood control measures help protect against flooding of the project site and the existing development. Vegetation growing between these berms and the project site is maintained to prevent encroachment. The project site is primarily undeveloped land although it is heavily maintained in association with the existing hotel development.

Project Site. The project site is a mixture of nonnative grasses and weeds among scattered trees and developed areas. This is a typical condition of ruderal areas subject to constant human-generated disturbances. Although primarily undeveloped, the site is consistently utilized by the existing hotel's maintenance operations. An existing gravel road bisects the site and provides access to a large wood pile and a utility facility. Numerous large piles of wood chips and mulch are situated in the areas between the riparian corridor and the extents of the area to be developed (i.e., project limits).

Vegetation within the project site is a waste place-nonnative grassland community type, likely either Wild Oats Grasslands (*Avena [barbata]* Semi-Natural Herbaceous Stands) or Upland Mustards (*Brassica [nigra]* and Other Mustards Semi-Natural Herbaceous Stands), as described in *A Manual of California Vegetation* (Sawyer et al. 2009). Herbaceous vegetation covers approximately 90 percent of the project site and primarily consists of Bermuda grass (*Cynodon dactylon*), slender wild oat (*Avena barbata*), brome (*Bromus* spp.), shortpod mustard (*Hirschfeldia incana*), fiddleneck (*Rumex pulcher*), horseweed (*Erigeron canadensis*), plantain (*Plantago* spp.), wild radish (*Raphanus sativus*), fennel (*Foeniculum vulgare*), and milk thistle (*Silybum marianum*). Scattered trees, including black cottonwood (*Populus trichocarpa*), western sycamore (*Platanus racemosa*), coast live oak (*Quercus agrifolia*), Monterey cypress (*Hesperocyparis macrocarpa* [most likely planted]), red willow (*Salix laevigata*), and a few small ornamentally landscaped species cover approximately 5 percent of the project site and make up the tree composition. The remaining 5 percent of the project site is covered by developed areas such as the gravel road and utility facility or operations (i.e., wood pile and wood chips/mulch).

Project Vicinity. Riparian woodland associated with the Carmel River (likely either Arroyo Willow Thicket [*Salix lasiolepis* Shrubland Alliance] or Black Cottonwood Forest [*Populus trichocarpa* Forest Alliance], as described in *A Manual of California Vegetation* [Sawyer et al. 2009]) borders the project site to the south and west. This woodland is primarily composed of willow (*Salix* spp.), black cottonwood, California blackberry (*Rubus ursinus*), poison oak (*Toxicodendron diversilobum*), cape ivy (*Delairea odorata*), and periwinkle (*Vinca major*). The project limits are approximately 30 to 50 feet away from this riparian corridor.

A mixture of native, yet likely planted, trees, including Monterey cypress, Monterey pine (*Pinus radiata*), native black cottonwood, and western sycamore, plus numerous exotic, ornamental, and

horticultural species, are associated with the existing Carmel River Inn complex to the east of the project site.

Both the riparian corridor and the landscaped trees associated with the existing Carmel River Inn complex occur outside of the project site and will not be directly impacted by this project. However, indirect effects (e.g., construction noise) may occur to these surrounding areas.

Jurisdictional Drainages and Wetlands

Project Site. There is no aquatic habitat or potentially jurisdictional feature present within the project site.

Project Vicinity. The Carmel River conveys flow approximately 125 to 150 feet south and west of the project site. The Carmel River is designated as an ESHA by the California Coastal Commission, and work in the channel and/or banks would be subject to United States Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and CDFW jurisdiction. Although no impacts to jurisdictional areas are anticipated, regulatory permits or authorizations may be needed from the respective agencies if the current project limits change to include potentially jurisdictional areas. Current plans show the project limits setback approximately 125 to 150 feet away from the river. The existing earthen berms between the river and the project site will preclude debris and sediment from the proposed project from entering the river. The Carmel River occurs outside of the project site and will not be impacted by this project.

SPECIAL-STATUS PLANT AND ANIMAL SPECIES

Two special-status plant species, Monterey cypress and Monterey pine (both likely planted), occur within or adjacent to the project site. These trees within and around the project site are not anticipated to require removal as they are an essential part of the landscape design. No other special-status plant or animal species within or around the project site were observed during the site assessment. The adjacent riparian corridor is intact habitat primarily composed of dominant native species and thus provides high-quality habitat for native plants and animals. However, the project site itself is highly disturbed and denuded in places, thus lowering the quality of the habitat and reducing the likelihood that the site supports special-status plant and animal species known to occur in the region.

Plants. The project site provides marginally suitable habitat for 10 special-status plant species: Hickman's onion (*Allium hickmanii*), Seaside bird's-beak (*Cordylanthus rigidus* ssp. *littoralis*), California dichondra (*Dichondra donnelliana*), Kellogg's horkelia (*Horkelia cuneata* var. *sericea*), marsh microseris (*Microseris paludosa*), woodland woollythreads (*Monolopia gracilens*), Gairdner's yampah (*Perideridia gairdneri* ssp. *gairdneri*), South Coast branching phacelia (*Phacelia ramosissima* var. *austrolittoralis*), Monterey clover (*Trifolium trichocalyx*), and saline clover (*Trifolium hydrophilum*). With the exception of the plants listed above, the project site does not support vegetation types or substrates, or is outside the elevation range for most of the special-status plant species known to occur in the region. Special-status perennial tree and shrub species known to occur in the region, such as manzanita (*Arctostaphylos* spp.) and Eastwood's goldenbush (*Ericameria*

fasciculata), would have been identifiable at the time of the survey, but none except Monterey cypress and Monterey pine were observed. Therefore, we can conclude that no naturally occurring special-status perennial tree or shrub species occur within the project site. While most perennial trees and shrubs were identifiable, most annual species were not, as it was late in the season and diagnostic features were no longer displayed. Therefore, although no special-status annual plant species were observed on site during the survey, their potential occurrence cannot be ruled out. In order to best determine whether any special-status annual plant species are present within the project site, a follow-up seasonally appropriate survey(s) will be conducted. The survey(s) will be conducted during the appropriate survey conditions and when the potentially occurring special-status species are in bloom. Based on the respective blooming periods for each of these species, a single survey conducted in May should suffice.

Animals. The project site may provide temporary habitat for dispersing or foraging special-status animal species (e.g., CRLF and western pond turtle [*Emys marmorata*]) and provides habitat for nesting birds.

California Red-legged Frog Assessment

The project site and surrounding habitats were assessed for their suitability to support CRLF. This habitat assessment was based on elements in the survey guidelines. No CRLF were observed or heard during the field assessment.

The CRLF is listed as a threatened species under FESA and is an SSC. This amphibian has declined in, or disappeared from, large portions of its former range in California but is still relatively common along the central coast of California, including portions of Monterey County. CRLF occurs in aquatic habitats such as creeks, ponds, and marshes. Suitable breeding habitat usually includes a minimum water depth of 10 to 20 inches, and the water must persist throughout the entire development period for eggs and tadpoles. During wet weather, CRLF often occurs in upland habitats near aquatic sites, and these frogs can disperse widely over upland habitats during wet weather.

There are three records of CRLF reported within 1 mile of the project site (CNDDB 2015) (see Figure 3). The closest known records are approximately 0.25 mile to the west and southeast along the Carmel River (CNDDB Nos. 472 and 1107, respectively). Given the project site's proximity to areas known to be occupied by CRLF, LSA does not recommend protocol-level surveys because the surveys would likely indicate CRLF to be present in and along the river. LSA assumes CRLF to at least be present along the river and within the riparian areas adjacent to the project site (the regulatory agencies would likely assume presence as well).

Under FESA, the USFWS is required to designate critical habitat for listed species, and it made the final designation of critical habitat for CRLF in 2010. The USFWS identified four habitat features, termed the primary constituent elements, to define critical habitat for CRLF. Therefore, the primary constituent elements used to define critical habitat are useful in evaluating CRLF habitat (regardless of critical habitat). The project site is located adjacent to, but not within, designated critical habitat for CRLF. Therefore, the proposed project would not adversely modify critical habitat. Descriptions of the appropriate primary constituent elements and their application to the project site and vicinity are provided below.

1. **Aquatic Breeding Habitat:** Standing bodies of fresh water, including natural and human-constructed ponds, slow-flowing streams or pools within streams, and other ephemeral or permanent water bodies that become inundated during winter rains and hold water for a minimum of 20 weeks in all but the driest years. Suitable water bodies for breeding are generally 10 to 20 inches in depth.

No aquatic habitat, let alone suitable aquatic breeding habitat for CRLF, is present on site. The section of the Carmel River and its associated riparian corridor (approximately 125 and 40 feet, respectively, south and west of the project site) is considered an ESHA due to the presence of endangered species, including CRLF. The river and riparian corridor are outside the project limits but provide suitable breeding habitat and a food base for CRLF. No CRLF were observed or heard during the survey, but six American bullfrogs (*Lithobates catesbeiana*) were observed in one pool where water still remained in the river. The presence of this predator and competitor of CRLF reduces the likelihood, but does not negate the presence, of CRLF in this section of the river. There is no aquatic habitat within the project site, and no impacts to aquatic or riparian areas will occur.

2. **Non-Breeding Aquatic Habitat:** Freshwater and wetted riparian habitats, as described above, that may not hold water long enough for CRLF eggs to hatch and complete their aquatic lifecycle, but that do provide for shelter, foraging, predator avoidance, and aquatic dispersal for juvenile and adult CRLF. Other wetland habitats that would be considered to meet these elements include, but are not limited to, pools in intermittent streams and seeps and springs of sufficient flow to withstand the summer dry period.

No aquatic habitat, let alone suitable non-breeding aquatic habitat for CRLF, is present on site. The section of the Carmel River and its associated riparian corridor are outside the project limits but provide suitable non-breeding habitat for CRLF. No impacts to aquatic or riparian areas will occur.

3. **Upland Habitat:** Habitat adjacent to breeding and non-breeding aquatic habitat up to a distance of 1 mile away in most cases and consisting of various vegetation types, such as grassland, scrublands, woodlands, and riparian areas that provide for CRLF shelter, foraging, and predator avoidance. Upland habitat should include structural features such as boulders, rocks, organic debris such as logs and/or moist leaf litter, and small mammal burrows.

The project site provides limited upland habitat for CRLF. The project site is sparsely vegetated with wild oats grassland or upland mustards subject to constant human-generated disturbances and with little cover suitable for amphibians (the exception being wood piles, moist leaf litter, and outbuildings that could be used by a dispersing CRLF especially during wet periods). Although CRLF will use small mammal burrows as upland refugia, the burrows found within the project site are those of Botta's pocket gopher (*Thomomys bottae*), which do not provide adequate upland refugia for CRLF (they are likely too small for adult CRLF, and the burrow castings collapse and close the entrance/exit to the burrow). Burrows of California ground squirrel (*Spermophilus beecheyi*) are preferred upland refugia for CRLF. However, no California ground squirrels or their burrows were observed within the project site. The project site provides very poor-quality upland habitat to support a dispersing CRLF.

4. **Dispersal Habitat:** Accessible upland or riparian dispersal habitat within designated units and between occupied locations within a minimum of 1 mile of each other and allowing for

movement between such sites. Dispersal habitat includes various natural and altered habitats such as agricultural fields and vineyards that do not contain barriers (such as heavily traveled roads without bridges or culverts).

During wet weather, post-metamorphic CRLF could disperse through the project site. However, because no permanent water source or aquatic habitat is located further upland within or beyond the project site, dispersing frogs would likely use the off-site Carmel River and its associated riparian vegetation instead as a movement corridor. The existing developments of the Carmel River Inn and the residential neighborhood provide barriers to direct movement across the project site.

Because CRLF may move long distances from breeding habitat to forage and find suitable habitat to colonize, there is a chance, albeit highly unlikely, that CRLF could occur within the project site occasionally. CRLF are presumed present (based on past observations) in the adjacent aquatic areas. Therefore, recommendations will be made for constructing the project to avoid impacts to CRLF. The project site does not provide suitable habitat to support a population of CRLF, and no impacts to CRLF are anticipated as a result of this project. If there is federal involvement with the project, additional studies, USFWS protocol-level surveys, or agency consultation for CRLF may be required.

IMPACT ASSESSMENT AND MANAGEMENT RECOMMENDATIONS FOR DEVELOPMENT

Although the project site is a ruderal area subject to constant human-generated disturbances, there is marginally suitable habitat for several special-status plant species. The project site provides nesting habitat for birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF). The off-site Carmel River and its associated riparian vegetation provide suitable habitat to support CRLF as permanent residents, but at best, the project site provides temporary refugia for dispersing or foraging CRLF.

LSA recommends implementing appropriate management recommendations to avoid "take" of special-status plant or animal species. These recommendations are listed below. Other project-specific measures may be developed based on whether or not the County requires additional surveys or analysis to satisfy its requirements.

- In order to best determine whether any special-status annual plant species are present within the project site, a follow-up focused botanical survey(s) should be conducted. The survey(s) should be scheduled for optimal survey conditions and when the potentially occurring special-status species are in bloom. Based on the respective blooming periods for each of these species, depending on rainfall patterns, a single survey should be conducted in May.
- To avoid impacts to native bird species (protected under the MBTA and the CFGF) that may utilize the project site, all work (at a minimum, vegetation removal or trimming and initial site grading) should take place outside the nesting bird season (i.e., September through January). However, if construction activities are scheduled to occur during the nesting season (February 1 through August 15), a qualified biologist should conduct preconstruction surveys for active bird nests within and adjacent to the work area. Surveys should be conducted within 3 calendar days of the scheduled construction activity. If no active nests are located, ground-disturbing/construction activities can proceed. If active nests are located, then construction

activities should only occur outside an exclusion zone to be developed by the qualified biologist in coordination with the appropriate regulatory agency based on the geographic setting of the nest and the species (i.e., 50 feet for common species and upwards of 300 feet for special-status or raptor species). Construction activities should avoid the exclusion zones until the qualified biologist determines that the young have successfully fledged or the nest is no longer considered active. A qualified biologist should conduct periodic site inspections to ensure that the exclusion zone is maintained and to monitor the nesting progression.

- The project site is adjacent to the Carmel River, which is a perennial stream and a designated ESHA. Therefore, a 150-foot setback from the Carmel River is required. The existing project limits are not within the river or its associated riparian corridor. However, the project limits should be established and delineated by construction personnel.
- Grading and paving activities conducted adjacent to an ESHA should be restricted to only the amount necessary for structural improvements.
- If feasible, construction activities should occur during the dry season and outside of the CRLF breeding season (January 1 through June 30), when CRLF are not as likely to be found away from the water or actively dispersing.
- A qualified biologist should conduct a preconstruction survey for CRLF and western pond turtle within 14 days prior to the start of construction and a follow-up survey within 24 hours prior to the start of construction.
- The qualified biological monitor should be on site during the initial ground disturbance activities (e.g., site clearing and grading) to ensure to the extent practicable that potentially occurring CRLF in the upland habitat are avoided during this phase of construction. Spot monitoring may be needed thereafter.
- If fencing or other barriers are to be installed prior to ground disturbance at the limits of setbacks around the project site, the biological monitor will oversee this installation. Fencing is another measure used to keep species such as CRLF from entering the project site during construction.
- No trees are planned to be removed; however, surface improvements and utility trenching will occur within the dripline of some trees. Whenever feasible the project should be designed, and best management practices implemented, to avoid or minimize impacts to trees.
- Prior to construction activity, a certified arborist should inspect the work areas within the dripline of the existing trees to identify zones of potential tree root impacts and avoidance areas. The arborist should advise the construction contractor on the placement of materials and equipment.
- Excavation work within the dripline of trees should be done with light equipment, by boring, or by hand whenever possible to avoid tearing of large-diameter roots. Root pruning should always be performed with a sharp blade, taking care not to tear root tissue. Root pruning required for construction purposes should be approved and monitored by a certified arborist.
- If it is necessary for heavy machinery to operate within the dripline of the trees, a layer of mulch or pea gravel at least 4 inches in depth should be deposited on the ground beneath the dripline and a ¾-inch sheet of plywood should be placed on top of the mulch for the machinery to be staged on. The plywood and mulch will reduce compaction of the soil within the dripline.
- Landscaping with native riparian species is required because the project site is located adjacent to a riparian corridor.

If you have any questions or comments regarding the site assessment or this letter, please feel free to contact Matt Willis at (805) 782-0745 or by email at matt.willis@lsa-assoc.com, or Eric Lichtwardt at (510) 236-6810 or by email at eric.lichtwardt@lsa-assoc.com.

Sincerely,

LSA ASSOCIATES, INC.



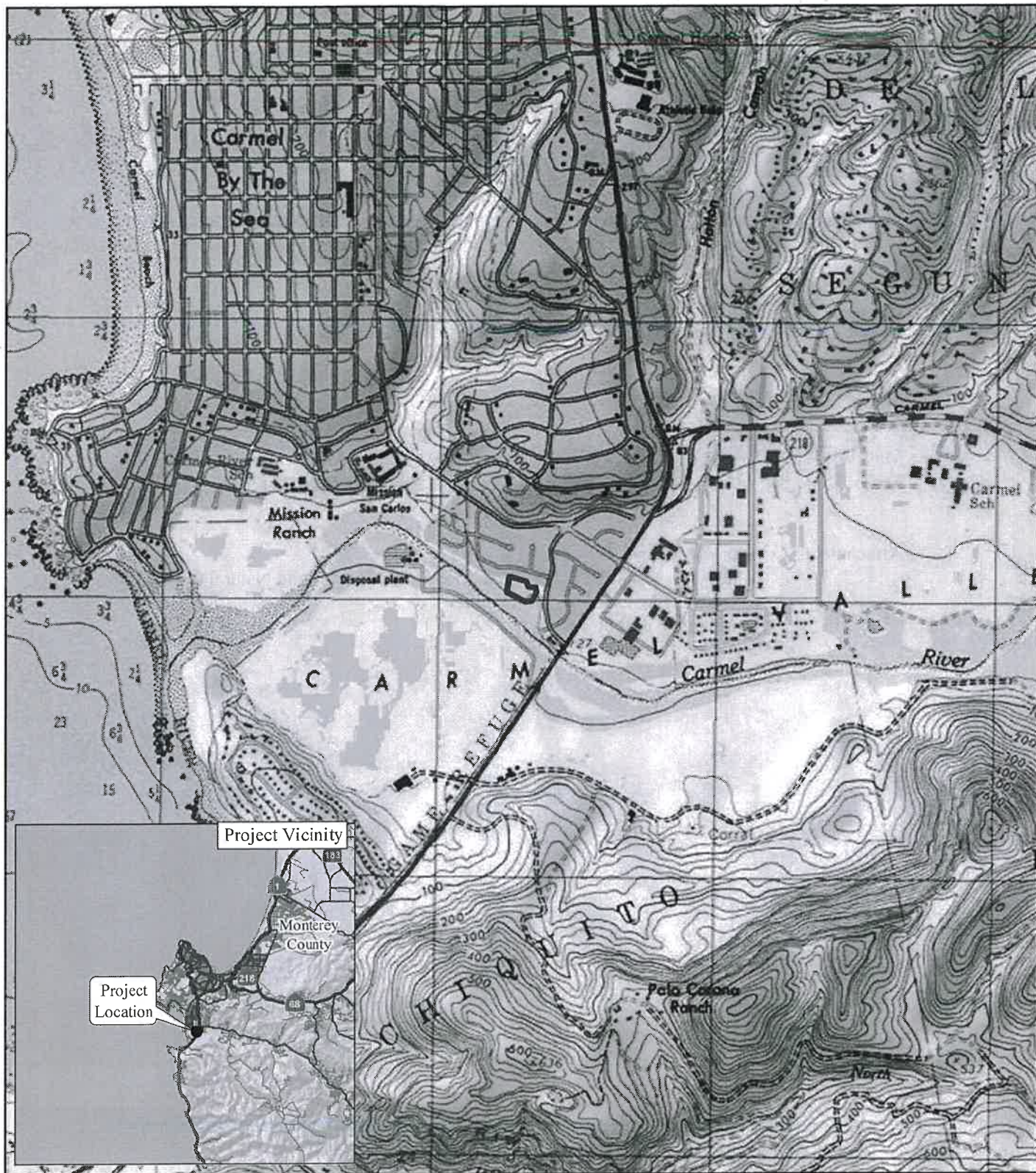
Matt Willis
Senior Biologist



Eric Lichtwardt
Associate Biologist

Attachments: Figures 1, 2, and 3
Table A: Regionally Occurring Special-Status Species and Natural Communities
within 3 Miles of the Project Site
Representative Photographs

Exhibit C



LSA

LEGEND

 Project Site

FIGURE 1



0  Miles

SOURCE: Esri (2015; USGS 7.5' Quad- Monterey (1987)

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Carmel River Inn
 APN: 009-563-005
 File Number: PLN150378
 26600 Oliver Road, Carmel-By-The-Sea, Monterey County, California
 Carmel Inn Ventures, LLC

Project Location and Vicinity Map

Exhibit C
 Page 11 of 97 Pages



LSA

LEGEND

 Project Site



0 200

Feet

SOURCE: Esri (2015)

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FIGURE 2

Carmel River Inn

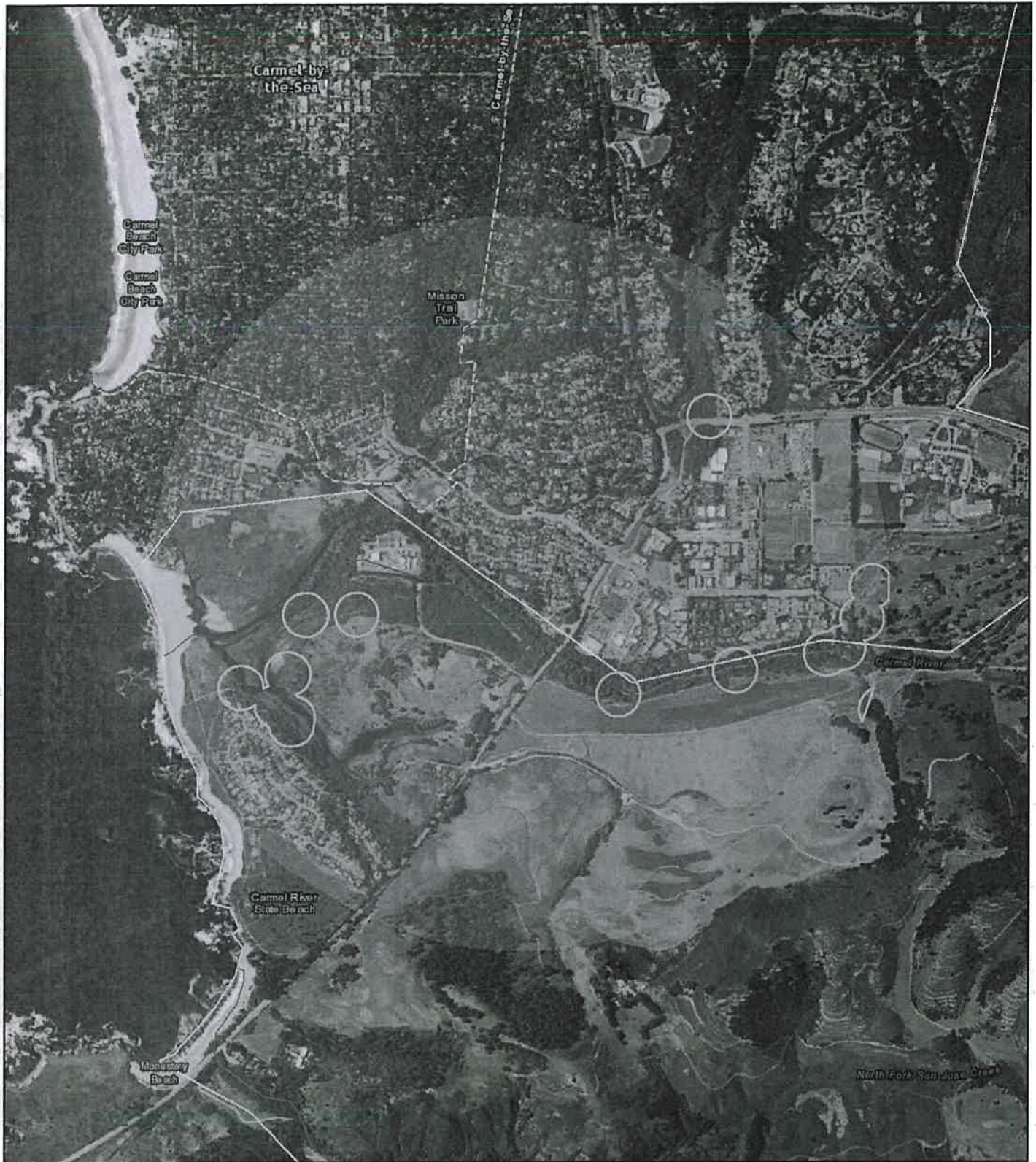
APN: 009-563-005

File Number: PLN150378

26600 Oliver Road, Carmel-By-The-Sea, Monterey County, California

Carmel Inn Ventures, LLC

Project Overview Map



LSA



LEGEND

- Project Site
- One Mile Buffer
- Steelhead Critical Habitat
- Red-Legged Frog Critical Habitat
- CNDDDB Occurences of Red-Legged Frog

SOURCE: CNDDDB (5/2015), ESRI (2015)

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FIGURE 3

Carmel River Inn

APN: 009-563-005

File Number: PLN150378

26600 Oliver Road, Carmel-By-The-Sea, Monterey County, California

Carmel Inn Ventures, LLC

CNDDDB Occurences of California Red-Legged Frog and
Critical Habitat within One Mile of the Project Site

Exhibit C

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other	General Habitat Description	Habitat Present/ Absent*	Rationale
PLANTS					
<i>Allium hickmanii</i>	Hickman's onion	--/--/IB.2	Closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, and valley and foothill grasslands. Elevation: 6 to 610 meters. Blooming period: March–May.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Arctostaphylos hookeri</i> ssp. <i>hookeri</i>	Hooker's manzanita	--/--/IB.2	Sandy soils, sandy shales, and sandstone outcrops in chaparral, coastal scrub, closed-cone coniferous forest, and cismontane woodland Elevation: 60 to 535 meters. Blooming period: January–June.	Absent	Does not occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.
<i>Arctostaphylos punila</i>	Sandmat manzanita	--/--/IB.2	Openings with sandy soil in closed-cone coniferous forest, chaparral, cismontane woodland, coastal dunes, and coastal scrub. Elevation: 3 to 205 meters. Blooming period: February–May.	Absent	Does not occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.
<i>Astragalus tener</i> var. <i>titi</i>	Coastal dunes milk-vetch	FE/SE/IB.1	Moist, sandy depressions of bluffs or dunes along and near the Pacific Ocean. Elevation: 1 to 50 meters. Blooming period: March–May.	Absent	Does not occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.
<i>Bryoria spiralis</i>	Twisted horsehair lichen	--/--/IB.1	Usually on conifers in North Coast coniferous forests. Elevation: 0 to 30 meters.	Absent	Unlikely to occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.
<i>Castilleja ambigua</i> var. <i>insulata</i>	Pink Johnny-nip	--/--/IB.1	Coastal bluff scrub or coastal prairies. Elevation: 0 to 100 meters. Blooming period: May–August.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Ceanothus rigidus</i>	Monterey ceanothus	--/--/4.2	Sandy substrates, chaparral, closed-cone coniferous forest. Elevation: 0 to 400 meters. Blooming period: March–May.	Absent	Does not occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.
<i>Chorizanthe pungens</i> var. <i>pungens</i>	Monterey spineflower	FT/--/IB.2	Sandy soils in coastal dunes or more inland within chaparral, cismontane woodland, coastal scrub, and valley and foothill grasslands. Elevation: 0 to 150 meters. Blooming period: April–June.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other†	General Habitat Description	Habitat Present/ Absent*	Rationale
<i>Clarkia jolonensis</i>	Jolon clarkia	--/--/1B.2	Chaparral, cismontane woodland, and coastal scrub. Elevation: 20 to 660 meters. Blooming period: April–June.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Collinsia multicolor</i>	San Francisco collinsia	--/--/1B.2	On decomposed shale (mudstone) mixed with humus or sometimes on serpentine within closed-cone coniferous forests or coastal scrub. Elevation: 30 to 250 meters. Blooming period: March–May.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Cordylanthus rigidus</i> ssp. <i>littoralis</i>	Seaside bird's-beak	--/SE/1B.1	Closed-cone coniferous forest, chaparral, cismontane woodland, coastal dunes, and coastal scrub with sandy soils. Often found in disturbed areas. Elevation: 0 to 425 meters. Blooming period: April–October.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Corethrogyne leucophylla</i>	Branching beach aster	--/--/3.2	Coastal dunes in coastal strand or closed-cone pine forest. Elevation: 3 to 60 meters. Blooming period: May–December.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Delphinium hutchinsoniae</i>	Hutchinson's larkspur	--/--/1B.2	Broad-leaved upland forest, chaparral, coastal prairie, and coastal scrub. On semi-shaded, slightly moist slopes that are usually west-facing. Elevation: 0 to 430 meters. Blooming period: March–June.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Delphinium umbraculorum</i>	Umbrella larkspur	--/--/1B.3	Mesic sites in cismontane woodland. Elevation: 400 to 1,600 meters. Blooming period: April–June.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Dichondra donnelliana</i>	California dichondra	--/--/--	Open slopes and moist fields. Elevation: 0 to 425 meters. Blooming period: March–June.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Ericameria fasciculata</i>	Eastwood's goldenbush	--/--/1B.1	Sandy openings in closed-cone coniferous forest, chaparral (maritime), coastal scrub, and coastal dunes. Elevation: 30 to 275 meters. Blooming period: July–October.	Absent	Does not occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other†	General Habitat Description	Habitat Present/ Absent*	Rationale
<i>Eriogonum nortonii</i>	Pinnacles buckwheat	--/--/1B.3	Found on sandy soils, often on recent burns in chaparral and valley and foothill grasslands within the western Santa Lucia Range. Elevation: 300 to 975 meters. Blooming period: May–August.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Erysimum menziesii</i>	Menzies' wallflower	--/--/1B.1	Localized on dunes and coastal strands. Elevation: 0 to 35 meters. Blooming period: March–April.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Fritillaria liliacea</i>	Fragrant fritillary	--/--/1B.2	Coastal scrub, valley and foothill grasslands, and coastal prairie. Often on serpentine and other ultramafic rocks. Usually found on clay soils in grasslands. Elevation: 3 to 410 meters. Blooming period: February–April.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Hesperocyparis goveniana</i>	Goven cypress	FT/--/1B.2	Occurs in closed-cone coniferous forest and chaparral. Known from only three native occurrences in Monterey County. Elevation: 30 to 300 meters.	Absent	Does not occur. No suitable habitat or growing conditions. Species would have been recognizable but was not observed during the survey.
<i>Hesperocyparis macrocarpa</i>	Monterey cypress	--/--/1B.2	Granitic soils in closed-cone coniferous forests. Elevation: 10 to 30 meters.	Present	Species present. Although likely planted, several <i>H. macrocarpa</i> are located within the project site near the existing Carmel River Inn development. The trees will not be impacted or removed.
<i>Horkelia cuneata</i> var. <i>sericea</i>	Kellogg's horkelia	--/--/1B.1	Closed-cone coniferous forest, chaparral, and coastal scrub; in openings with sandy or gravelly soil. Elevation: 10 to 200 meters. Blooming period: April–September.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Layia carnosa</i>	Beach layia	FE/SE/1B.1	On sparsely vegetated, semi-stabilized dunes, usually behind foredunes. Elevation: 0 to 60 meters. Blooming period: March–July.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Lupinus tidestromii</i>	Tidestrom's lupine	FE/SE/1B.1	Coastal dunes. Elevation: 0 to 100 meters. Blooming period: April–June.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other	General Habitat Description	Habitat Present/ Absent*	Rationale
<i>Malacothamnus palmeri</i> var. <i>involutus</i>	Carmel Valley bush-mallow	--/--/1B.2	Talus hilltops and slopes, sometimes on serpentine in cismontane woodland, chaparral, and coastal scrub. Fire dependent. Elevation: 30 to 1,100 meters. Blooming period: May–October.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Malacothamnus palmeri</i> var. <i>palmeri</i>	Santa Lucia bush- mallow	--/--/1B.2	Dry, rocky slopes, mostly near summits but occasionally extending down canyons to the sea in chaparral. Elevation: 60 to 360 meters. Blooming period: May–July.	Absent	Does not occur. No suitable habitat or growing conditions. Species was not observed during the survey.
<i>Microseris paludosa</i>	Marsh microseris	--/--/1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, and valley and foothill grassland. Elevation: 5 to 300 meters. Blooming period: April–June.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Monardella sinuata</i> ssp. <i>nigrescens</i>	Northern curly- leaved monardella	--/--/1B.2	Sandy soils in coastal dunes, coastal scrub, chaparral, and lower montane coniferous forest. Elevation: 0 to 300 meters. Blooming period: May–July.	Absent	Does not occur. No suitable habitat and growing conditions present. Species not observed during the survey.
<i>Monolopia gracilens</i>	Woodland woollythreads	--/--/1B.2	Grassy sites, in openings, or on sandy to rocky (serpentine) soils in chaparral, valley and foothill grasslands, cismontane woodland, broad-leaved upland forests, and North Coast coniferous forest. Often seen on serpentine after burns but may have only weak affinity to serpentine. Elevation: 100 to 1,200 meters. Blooming period: March–July.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Perideridia gairdneri</i> ssp. <i>gairdneri</i>	Gairdner's yampah	--/--/4.2	Coastal flats, valley grassland, mixed evergreen forest, and freshwater wetlands. Elevation: 0 to 350 meters. Blooming period: June–July.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Phacelia ramosissima</i> var. <i>australitalis</i>	South coast branching phacelia	--/--/3.2	Diverse habitats, including sand dunes, salt marshes, coastal bluffs, canyons, washes, flats, meadows, and conifer forests. Elevation: <3,800 meters. Blooming period: March–August.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other†	General Habitat Description	Habitat Present/ Absent*	Rationale
<i>Pinus radiata</i>	Monterey pine	--/--/IB.1	Dry bluffs and slopes in closed-cone coniferous forest and cismontane woodland. Three primary stands are native to California. Elevation: 25 to 185 meters.	Present	Species present. Although likely planted, several <i>P. radiata</i> are located within the project site near the existing Carmel River Inn development. These trees are not anticipated to be impacted or removed.
<i>Piperia yadonii</i>	Yadon's rein orchid	FE/--/IB.1	On sandstone and sandy soil, but poorly drained and often dry within closed-cone coniferous forest, chaparral, and coastal bluff scrub. Elevation: 10 to 510 meters. Blooming period: May–August.	Absent	Does not occur. No suitable habitat and growing conditions present. Species not observed during the survey.
<i>Potentilla hickmanii</i>	Hickman's cinquefoil	FE/SE/IB.1	Freshwater marshes, seeps, and small streams in open or forested areas along the coast. Elevation: 10 to 150 meters. Blooming period: April–August.	Absent	Does not occur. No suitable habitat and growing conditions present. Species not observed during the survey.
<i>Rhododendron</i> spp.	Rhododendron	--/--/--	Occasionally well-drained sites within coniferous forest margins, along the coast, bogs, streambanks, moist wooded slopes and canyon bottoms. Elevation: 0 to 3,600 meters. Blooming period: April–August.	Absent	Does not occur. No suitable habitat and growing conditions present. Species not observed during the survey.
<i>Rosa pinetorum</i>	Pine rose	--/--/IB.2	Closed-cone coniferous forest. Elevation: 2 to 300 meters. Blooming period: May–July.	Absent	Does not occur. No suitable habitat and growing conditions present. Species not observed during the survey.
<i>Trifolium hydrophilum</i>	Saline clover	--/--/IB.2	Prefers mesic alkaline sites in marshes and swamps, valley and foothill grasslands, and vernal pools. Elevation: <300 meters. Blooming period: April–June.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
<i>Trifolium polyodon</i>	Pacific Grove clover	--/SR/IB.1	Along small springs and seeps in grassy openings within closed-cone coniferous forest, meadows and seeps, coastal prairie, and valley and foothill grasslands. Elevation: 5 to 120 meters. Blooming period: April–June.	Absent	Does not occur. No suitable habitat and growing conditions present. Species not observed during the survey.

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other†	General Habitat Description	Habitat Present/ Absent*	Rationale
<i>Trifolium trichocalyx</i>	Monterey clover	FE/SE/IB,I	Poorly drained and low nutrient soil underlain with hardpan, as well as openings and burned areas in closed-cone coniferous forests. Elevation: 30 to 240 meters. Blooming period: April–June.	Present	Unlikely to occur. Suitable habitat and growing conditions present. Species not observed during the survey.
ANIMALS					
Insects					
<i>Euphilotes enoptes smithi</i>	Smith's blue butterfly	FE/--/--	Most commonly associated with coastal dunes and coastal sage scrub plant communities in Monterey and Santa Cruz Counties. Host plant: <i>Eriogonum latifolium</i> and <i>Eriogonum parvifolium</i> are utilized as both larval and adult food plants.	Absent	Does not occur. No suitable habitat or host plants present. Species not observed during the survey.
Crustaceans					
Fish					
<i>Oncorhynchus mykiss tshawytscha</i>	South/Central California Coast Steelhead DPS	FT/--/SSC	Coastal rivers and streams with cold water and deep (3 feet or greater) pools and runs; requires clean, silt-free gravel (0.5–5 inches) beds with clear, flowing water and shaded stream reaches for spawning. Spawning adults occur during winter high water. Adults are wide-ranging in offshore and inshore pelagic marine waters.	Absent	Does not occur. No aquatic habitat within the project site. The project site is adjacent to designated Critical Habitat associated with the Carmel River. Species not observed during the survey.
Amphibians					
<i>Ambystoma californiense</i>	California tiger salamander	FT/ST/SSC	Breeds in temporary pools (e.g., vernal pools) and ponds and occupies rodent burrows in grasslands, open valley oak and coast live oak woodland, and grassland chaparral mosaic. These salamanders migrate from their underground retreats to breeding ponds during periods of heavy winter rains.	Absent	Does not occur. No suitable habitat or refugia present. Species not observed during the survey.
<i>Rana draytonii</i>	California red-legged frog	FT/--/SSC	Creeks, ponds, and marshes in lowlands and foothills. Prefers aquatic habitat with deep (2 feet or deeper) areas with undercut banks, emergent aquatic vegetation, and bank cover. Does not occur in salt marshes or wetland with brackish water.	Present	Unlikely to occur. No aquatic habitat and limited refugia within the highly disturbed project site; upland habitat is less than ideal. However, because project site is adjacent to known CRLF records and designated Critical Habitat, dispersing adult CRLF could move through during wet weather. Recommend

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other†	General Habitat Description	Habitat Present/ Absent*	Rationale
Reptiles					
<i>Anniella pulchra nigra</i>	Black legless lizard	--/--/SSC	Sandy soil, leaf litter/dunes, bush lupine, and mock heather are often dominant plants in suitable habitat along the Central Coast. Moist soil and deep humus are important habitat elements.	Absent	Does not occur. No suitable habitat present. Species not observed during the survey.
<i>Emys marmorata</i>	Western pond turtle	--/--/SSC	Occurs in a wide variety of freshwater habitats with deep water, including slow-flowing pools of rivers and streams, ponds, and marshes. Prefers aquatic habitats with a muddy or sand bottom, but also occurs in areas with a rocky or cobble bottom. Generally most common in areas with abundant basking habitat such as fallen trees. Must have access to upland areas with friable soils for egg laying.	Present	Unlikely to occur. No aquatic habitat within the project site and upland habitat is less than ideal. However, western pond turtle is known to be present within the Carmel River and its associated vegetation. Recommend working during the dry season and having a monitor on site for initial ground disturbance. Species not observed during the survey.
Birds					
<i>Cypseloides niger</i>	Black swift	--/--/SSC	Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea bluffs above the surf. Forages widely. Located in the coastal belt of Santa Cruz and Monterey Counties, central and southern Sierra Nevada, San Bernardino, and San Jacinto Mountains.	Absent	Does not occur. No suitable habitat present. Species not observed during the survey.
<i>Pelecanus occidentalis californicus</i>	California brown pelican	FDE/SDE/FP	Open marine waters with abundant small schooling fish populations. Nests on islands lacking terrestrial predators. Roosts on isolated islands, rocks, breakwaters, and docks.	Absent	Does not occur. No suitable marine habitat (no nesting colony or communal roosts) present. Species not observed during the survey.
Habitat Types					
Central Maritime Chaparral			Indicated by shrubby woody vegetation that includes certain <i>Arctostaphylos</i> taxa occurring in maritime-dominated climatic areas in Central California.	Absent	Does not occur. This vegetation community was not observed during the survey.

Table A: Regionally Occurring Special-Status Species and Natural Communities within 3 Miles of the Project Site

Scientific Name	English Name	Status Federal/State/ Other†	General Habitat Description	Habitat Present/ Absent*	Rationale
Monterey Cypress Forest			Coniferous forest dominated by Monterey cypress (<i>H. macrocarpa</i>).	Absent	Does not occur. This vegetation community was not observed during the survey.
Monterey Pine Forest			Coniferous forest dominated by Monterey pine (<i>P. radiata</i>).	Absent	Does not occur. This vegetation community was not observed during the survey.
Monterey Pygmy Cypress Forest			Coniferous forest dominated by dwarfed Monterey cypress (<i>H. macrocarpa</i>) occurring in very shallow soil.	Absent	Does not occur. This vegetation community was not observed during the survey.

† Status:

Federal Endangered (FE)

Federal Threatened (FT)

Federal Candidate (FC)

Federally Delisted (FDE)

State Endangered (SE)

State Threatened (ST)

State Candidate Threatened (SCT)

State Delisted (SIDE)

California Rare Plant Rank (1B, 2B, 3, 4)

1B = Rare, threatened, or endangered in California and elsewhere

2B = Rare, threatened, or endangered in California, but more common elsewhere

3 = Plants about which more information is needed – a review list

4 = Plants of limited distribution – a watch list

.1 = seriously threatened in California; .2 = moderately threatened in California; .3 = not very threatened in California

DPS = Distinct Population Segment

SR = State Rare (plants)

SSC = California Species of Special Concern (animals)

FP = California Fully Protected (animals).



Photo 1. The primary access road and existing Carmel River Inn development adjacent to the project site, facing north.



Photo 2. The eastern limits of the project site from the existing Carmel River Inn development, facing southwest. The cabin shown exemplifies the overall design of the project.



Photo 3. The center of the project site showing the existing conditions, facing west.



Photo 4. The center of the project site showing the existing conditions, facing northwest.



Photo 5. The center of the project site showing the existing conditions and the existing Carmel River Inn development, facing east.



Photo 6. Wood chip and mulch piles at the far northwest corner of the other project site, facing southeast.



Photo 7. The project site with its few scattered trees, facing southeast.

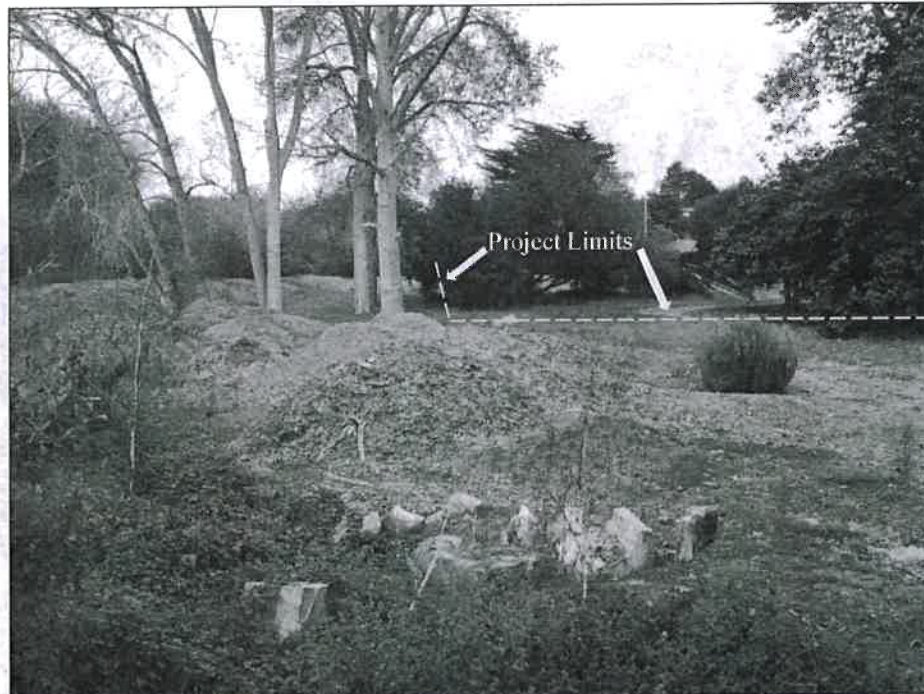


Photo 8. The edge of the riparian corridor associated with the Carmel River and the project limits, facing north.



Photo 9. Off-site riparian corridor associated with the Carmel River beyond the wood chip and mulch piles, facing west.



Photo 10. Off-site riparian corridor associated with the Carmel River, facing southwest.



TETRA TECH

October 28, 2015

Mr. Dan Lister
Monterey County Planning Department
168 West Alisal, 2nd Floor
Salinas, CA 93901

RE: Impact of Proposed Improvements for Carmel River Inn on the Carmel River Base Flood Elevations

Dear Mr. Lister:

At your request, Tetra Tech has performed a hydraulic analysis of the Carmel River floodplain due to proposed improvements at the Carmel River Inn, located at 26600 Oliver Road, Carmel, CA, 93923. The purpose of this analysis was to verify that the proposed improvements result in no increase in the base flood (100-year) water surface elevation as indicated on the Flood Insurance Rate Map (FIRM) prepared by Federal Emergency Management Agency (FEMA) in 2009.

Model Approach and Results

The existing flood model used to prepare the FEMA FIRM map was modified to incorporate the proposed improvements and modifications to the ground surface to support the Carmel River Inn. The Army Corps of Engineers program used to create and modify the water model was HEC-RAS 4.1.0. The flood model was provided to Tetra Tech by the Monterey County Water Resources Agency and it is Tetra Tech's understanding that the model was originally developed by Balanced Hydraulics.

To apply the proposed improvements to the model, the existing model was modified to reflect the proposed development plan. The proposed development plan included changes to the site grading and the addition of the modular cabin units. In onset of a flood event the cabins rest at an elevation so that the flood water surface elevation is below the elevation of the cabin finished floor. This means that cabin wheels were submerged. Some cabins will need to be relocated so that the finished floor is above the flood elevation. The relocated cabins are provided in the landscaping plans.

The conditions of the model were set to the "worst case scenario" as identified in the FEMA flood study which occurs when the north levee fails. The water surface elevations were then compared to the FEMA Flood Insurance Map Number 060196, Panel 0320, Suffix G. It should be noted that the existing model did not contain sufficient flood plain sections within the project area to evaluate changes in water surface elevation. Therefore additional sections were generated to accurately compare the water surface elevations of the pre and post project development. The additional sections are provided in the exhibit attached hereto.

Mr. Lister
October 28, 2015
Page 2

The analysis determined that with the proposed grading, the water surface elevation does not change due to the improvements for the Carmel River Inn. The water surface elevation remains between 23 feet and 26 feet throughout the project site.

There are two factors that ensure that improvements at the Carmel River Inn do not impact base flood elevations during the "worst case scenario" event.

1. Improvements represent a relatively small footprint to the watershed. The floodplain is flat enough, and therefore large enough that during the "worst case scenario", improvements displace a small portion of the whole flood from its original pre-development flow path.
2. There is a net soil export from the site created specifically to insure that the proposed project did not increase the base flood elevation. This net soil export either balances the volume of fill within each section or creates a deficit in soil volume within each section. Therefore the water surface elevation is either the same or lower in the post developed condition when compared to the pre-developed condition.

Attached includes a flood map illustrating the additional sections analyzed in this study. The attached tables correspond to the study section. Each table illustrates the 100-year water surface elevation for the pre- and post-developed condition.

Conclusion

A hydraulic analysis was performed on the Carmel River floodplain to assess the impacts of proposed improvements for the Carmel River Inn. The results of that analysis show that there is no increase in the base flood water surface elevation. The water surface elevation remains at approximately 23 feet to 26 feet per the FEMA Flood Insurance Rate Map No. 060196, Panel 0320, Suffix G, 2009.

Sincerely,

Craig Ziel, PE

RIVER
STATION

WATER
SURFACE
ELEVATION

POST DEVELOPMENT
ANALYSIS

HEC-RAS Plan: P04_G04_F04 River: CARMEL_FLDPLN2 Reach: FLDPLN2

Reach	River Sta	Profile	Q Total (cfs)	Min Ch El (ft)	W.S. Elev (ft)	Crit W.S. (ft)	E.G. Elev (ft)	E.G. Slope (ft/ft)	Vel Chnl (ft/s)	Flow Area (sq ft)	Top Width (ft)	Froude # Chl
FLDPLN2	6885.990	100-Yr	500.00	33.71	37.92		37.93	0.000761	0.91	549.73	283.00	0.12
FLDPLN2	6885.990	500-Yr	2100.00	33.71	39.44		39.49	0.002932	1.78	1180.93	610.99	0.23
FLDPLN2	6798.585	100-Yr	500.00	33.66	37.78		37.81	0.003234	1.30	384.21	342.69	0.22
FLDPLN2	6798.585	500-Yr	2100.00	33.66	39.18		39.21	0.003442	1.43	1473.24	1199.90	0.23
FLDPLN2	6708.436	100-Yr	500.00	34.29	37.62		37.63	0.001278	0.81	620.29	565.94	0.14
FLDPLN2	6708.436	500-Yr	2100.00	34.29	38.96		38.98	0.001939	1.10	1903.39	1480.69	0.17
FLDPLN2	6635.903	100-Yr	1600.00	33.56	37.10		37.23	0.011883	2.95	542.53	376.73	0.43
FLDPLN2	6635.903	500-Yr	3900.00	33.56	38.59		38.66	0.007682	2.20	1770.27	1371.02	0.34
FLDPLN2	6557.074	100-Yr	1600.00	32.08	35.06	34.81	35.64	0.039210	6.07	263.44	196.56	0.81
FLDPLN2	6557.074	500-Yr	3900.00	32.08	37.05	36.29	37.50	0.034855	5.38	723.82	638.77	0.75
FLDPLN2	6207.832	100-Yr	1600.00	28.16	34.97	31.88	34.98	0.000425	0.96	1671.05	800.40	0.09
FLDPLN2	6207.832	500-Yr	3900.00	28.16	36.02	33.41	36.06	0.001352	1.69	2304.40	1070.01	0.17
FLDPLN2	5826.274	100-Yr	1600.00	31.42	34.79	33.55	34.79	0.000562	0.69	2314.18	1434.58	0.10
FLDPLN2	5826.274	500-Yr	3900.00	31.42	35.61	33.76	35.62	0.000964	1.08	3597.91	1701.67	0.13
FLDPLN2	5469.934	100-Yr	1600.00	30.87	34.01	33.82	34.05	0.004414	1.59	1003.96	1005.28	0.26
FLDPLN2	5469.934	500-Yr	3900.00	30.87	34.99	33.82	35.04	0.003445	1.68	2326.65	1486.77	0.24
FLDPLN2	5275.201	100-Yr	1600.00	29.86	32.75	32.75	32.84	0.009265	2.36	679.08	610.01	0.37
FLDPLN2	5275.201	500-Yr	3900.00	29.86	32.75	32.75	33.26	0.055056	5.74	679.05	610.00	0.91
FLDPLN2	4966.466	100-Yr	1600.00	23.32	28.47	25.18	28.47	0.000096	0.42	3765.10	1288.37	0.04
FLDPLN2	4966.466	500-Yr	3900.00	23.32	29.33	25.81	29.34	0.000249	0.80	4896.51	1331.36	0.07
FLDPLN2	4795.967	100-Yr	4900.00	23.67	28.35	26.12	28.38	0.001462	1.40	3500.37	1542.97	0.16
FLDPLN2	4795.967	500-Yr	8800.00	23.67	29.15	26.70	29.20	0.001757	1.86	4741.93	1571.38	0.19
FLDPLN2	4630.757	100-Yr	4900.00	23.59	28.21	25.57	28.23	0.000634	1.02	4784.38	1801.43	0.11
FLDPLN2	4630.757	500-Yr	8800.00	23.59	28.96	26.04	29.00	0.000891	1.43	6144.82	1804.82	0.14
FLDPLN2	4457.768	100-Yr	4900.00	21.63	28.16	24.14	28.17	0.000172	0.67	7265.01	1922.31	0.06
FLDPLN2	4457.768	500-Yr	8800.00	21.63	28.89	24.74	28.91	0.000311	1.02	8667.58	1937.74	0.08
FLDPLN2	4361.739	100-Yr	4900.00	21.33	28.15	23.47	28.16	0.000108	0.58	8383.42	1937.97	0.05
FLDPLN2	4361.739	500-Yr	8800.00	21.33	28.87	23.98	28.88	0.000212	0.90	9778.22	1962.39	0.07
FLDPLN2	4242.864	100-Yr	4900.00	21.65	28.14	23.80	28.14	0.000129	0.63	7792.09	1845.45	0.05
FLDPLN2	4242.864	500-Yr	8800.00	21.65	28.84	24.21	28.85	0.000253	0.97	9090.01	1859.56	0.08
FLDPLN2	4208.0		Ini Struct									
FLDPLN2	4124.176	100-Yr	4900.00	20.88	25.58		25.62	0.001995	1.61	3035.63	1364.45	0.19
FLDPLN2	4124.176	500-Yr	8800.00	20.88	26.31		26.38	0.002649	2.17	4050.98	1442.47	0.23
FLDPLN2	3556.034	100-Yr	4900.00	18.72	25.41		25.42	0.000130	0.70	7012.48	1426.84	0.06
FLDPLN2	3556.034	500-Yr	8800.00	18.72	25.95		25.97	0.000297	1.13	7789.96	1435.77	0.09
FLDPLN2	3250	100-Yr	4900.00	20.19	25.27		25.30	0.000804	1.28	3847.37	1265.00	0.13
FLDPLN2	3250	500-Yr	8800.00	20.19	25.64		25.70	0.001785	2.06	4309.93	1266.75	0.19
FLDPLN2	3200	100-Yr	4900.00	19.79	25.20		25.22	0.000708	1.27	3909.31	1231.51	0.12
FLDPLN2	3200	500-Yr	8800.00	19.79	25.46		25.53	0.001772	2.11	4230.29	1232.83	0.19
FLDPLN2	3150	100-Yr	4900.00	19.96	25.09		25.12	0.000740	1.31	3806.79	1197.92	0.12
FLDPLN2	3150	500-Yr	8800.00	19.96	25.15		25.23	0.002246	2.31	3879.52	1198.24	0.22
FLDPLN2	3125	100-Yr	4900.00	18.49	25.07		25.10	0.000784	1.35	3711.29	1164.88	0.13
FLDPLN2	3125	500-Yr	8800.00	18.49	25.09		25.17	0.002493	2.41	3728.40	1164.96	0.23
FLDPLN2	3100	100-Yr	4900.00	19.00	25.01		25.04	0.000907	1.42	3538.70	1164.52	0.14
FLDPLN2	3100	500-Yr	4900.00	19.00	25.01		25.04	0.000907	1.42	3538.70	1164.52	0.14
FLDPLN2	3075	100-Yr	4900.00	18.13	24.93		24.97	0.000967	1.46	3435.27	1131.27	0.14
FLDPLN2	3075	500-Yr	4900.00	18.13	24.93		24.97	0.000967	1.46	3435.27	1131.27	0.14
FLDPLN2	3050	100-Yr	4900.00	17.91	24.91		24.94	0.001033	1.51	3310.37	1102.66	0.15
FLDPLN2	3050	500-Yr	4900.00	17.91	24.91		24.94	0.001033	1.51	3310.37	1102.66	0.15
FLDPLN2	3025	100-Yr	4900.00	17.97	24.83		24.86	0.001092	1.53	3284.99	1100.17	0.15
FLDPLN2	3025	500-Yr	4900.00	17.97	24.83		24.86	0.001092	1.53	3284.99	1100.17	0.15
FLDPLN2	3000	100-Yr	4900.00	18.69	24.74		24.78	0.001158	1.56	3231.56	1083.72	0.15
FLDPLN2	3000	500-Yr	4900.00	18.69	24.74		24.78	0.001158	1.56	3231.56	1083.72	0.15

BEGIN REDUCTION IN DEPTH OF FLOW

SITE

POST DEVELOPMENT ANALYSIS

HEC-RAS Plan: P04_G04_F04 River: CARMEL_FLDPLN2 Reach: FLDPLN2 (Continued)

Reach	River Sta	Profile	Q Total (cfs)	Min Ch El (ft)	W.S. Elev (ft)	Crit W.S. (ft)	E.G. Elev (ft)	E.G. Slope (ft/ft)	Vel Chnl (ft/s)	Flow Area (sq ft)	Top Width (ft)	Froude # Chl
FLDPLN2	2975	100-Yr	4900.00	19.00	24.71		24.75	0.001315	1.62	3104.75	1071.54	0.16
FLDPLN2	2975	500-Yr	4900.00	19.00	24.71		24.75	0.001315	1.62	3104.75	1071.54	0.16
FLDPLN2	2950	100-Yr	4900.00	19.00	24.61		24.65	0.001442	1.68	2982.93	1037.37	0.17
FLDPLN2	2950	500-Yr	4900.00	19.00	24.61		24.65	0.001442	1.68	2982.93	1037.37	0.17
FLDPLN2	2925	100-Yr	4900.00	19.00	24.49		24.54	0.001528	1.73	2891.94	1003.29	0.18
FLDPLN2	2925	500-Yr	4900.00	19.00	24.49		24.54	0.001528	1.73	2891.94	1003.29	0.18
FLDPLN2	2900	100-Yr	4900.00	19.00	24.37		24.42	0.001643	1.78	2824.64	1002.89	0.18
FLDPLN2	2900	500-Yr	4900.00	19.00	24.37		24.42	0.001643	1.78	2824.64	1002.89	0.18
FLDPLN2	2850	100-Yr	4000.00	18.71	24.25		24.28	0.001096	1.49	2780.71	968.92	0.15
FLDPLN2	2850	500-Yr	4000.00	18.71	24.25		24.28	0.001096	1.49	2780.71	968.92	0.15
FLDPLN2	2800	100-Yr	4000.00	18.00	24.10		24.15	0.001736	1.81	2281.93	834.84	0.19
FLDPLN2	2800	500-Yr	4000.00	18.00	24.10		24.15	0.001736	1.81	2281.93	834.84	0.19
FLDPLN2	2750	100-Yr	4000.00	20.00	23.70		23.78	0.003669	2.37	1751.80	757.96	0.26
FLDPLN2	2750	500-Yr	4000.00	20.00	23.70		23.78	0.003669	2.37	1751.80	757.96	0.26
FLDPLN2	2538.141	100-Yr	4000.00	13.99	23.23	20.61	23.27	0.001628	1.77	2266.04	760.76	0.18
FLDPLN2	2538.141	500-Yr	4000.00	13.99	23.23	20.61	23.27	0.001628	1.77	2266.05	760.76	0.18
FLDPLN2	2344.412	100-Yr	4000.00	14.89	23.04	20.30	23.06	0.000733	1.33	3005.74	847.83	0.12
FLDPLN2	2344.412	500-Yr	4000.00	14.89	23.04	20.30	23.06	0.000733	1.33	3005.74	847.83	0.12
FLDPLN2	2068.144	100-Yr	4000.00	19.87	22.39	21.72	22.54	0.011801	3.07	1304.29	849.10	0.44
FLDPLN2	2068.144	500-Yr	4000.00	19.87	22.39	21.72	22.54	0.011801	3.07	1304.30	849.10	0.44
FLDPLN2	1863.540	100-Yr	4000.00	16.02	21.29	19.42	21.36	0.003292	2.21	1810.59	740.16	0.25
FLDPLN2	1863.540	500-Yr	4000.00	16.02	21.29	19.42	21.36	0.003292	2.21	1810.54	740.16	0.25
FLDPLN2	1640.295	100-Yr	4000.00	10.07	20.63	17.10	20.71	0.002592	2.19	1825.22	628.41	0.23
FLDPLN2	1640.295	500-Yr	4000.00	10.07	20.63	17.10	20.71	0.002592	2.19	1825.13	628.37	0.23
FLDPLN2	1506.056	100-Yr	600.00	17.00	20.38	18.90	20.39	0.001072	0.83	720.93	549.73	0.13
FLDPLN2	1506.056	500-Yr	600.00	17.00	20.38	18.90	20.39	0.001072	0.83	720.83	549.73	0.13
FLDPLN2	1409.046	100-Yr	600.00	15.78	20.37	16.96	20.37	0.000057	0.32	1848.94	638.53	0.03
FLDPLN2	1409.046	500-Yr	600.00	15.78	20.37	16.96	20.37	0.000057	0.32	1848.82	638.52	0.03
FLDPLN2	1265.284	100-Yr	600.00	15.49	20.34	18.31	20.35	0.000576	0.72	833.02	494.01	0.10
FLDPLN2	1265.284	500-Yr	600.00	15.49	20.34	18.31	20.35	0.000576	0.72	832.93	494.00	0.10
FLDPLN2	1083.656	100-Yr	400.00	15.57	19.12	19.12	20.01	0.061202	7.56	52.94	29.84	1.00
FLDPLN2	1083.656	500-Yr	400.00	15.57	19.12	19.12	20.01	0.061202	7.56	52.94	29.84	1.00
FLDPLN2	822.160	100-Yr	300.00	13.83	17.50	15.31	17.51	0.000880	0.94	319.37	174.98	0.12
FLDPLN2	822.160	500-Yr	800.00	13.83	18.26	16.03	18.31	0.002313	1.73	462.83	209.07	0.20
FLDPLN2	574.442	100-Yr	600.00	11.60	16.67	15.15	16.76	0.009081	2.34	256.68	205.69	0.37
FLDPLN2	574.442	500-Yr	800.00	11.60	17.72	15.48	17.75	0.002142	1.55	515.12	257.96	0.19
FLDPLN2	340.867	100-Yr	600.00	10.07	15.99	12.41	16.01	0.001554	1.25	478.85	260.20	0.16
FLDPLN2	340.867	500-Yr	800.00	10.07	17.55	12.80	17.56	0.000407	0.84	950.11	343.16	0.09

RIVER
STATION

WATER
SURFACE
ELEVATION

PRE DEVELOPMENT ANALYSIS

HEC-RAS Plan: P04 ~~004~~ F04 River: CARMEL_FLDPLN2 Reach: FLDPLN2

Reach	River Sta	Profile	Q Total (cfs)	Min Ch El (ft)	W.S. Elev (ft)	Crit W.S. (ft)	E.G. Elev (ft)	E.G. Slope (ft/ft)	Vel Chnl (ft/s)	Flow Area (sq ft)	Top Width (ft)	Froude # Chl
FLDPLN2	6885.990	100-Yr	500.00	33.71	37.92		37.93	0.000761	0.91	549.73	283.00	0.12
FLDPLN2	6885.990	500-Yr	2100.00	33.71	39.44		39.49	0.002932	1.78	1180.93	610.99	0.23
FLDPLN2	6798.585	100-Yr	500.00	33.66	37.78		37.81	0.003234	1.30	384.21	342.69	0.22
FLDPLN2	6798.585	500-Yr	2100.00	33.66	39.18		39.21	0.003442	1.43	1473.24	1199.90	0.23
FLDPLN2	6708.436	100-Yr	500.00	34.29	37.62		37.63	0.001278	0.81	620.29	565.94	0.14
FLDPLN2	6708.436	500-Yr	2100.00	34.29	38.96		38.98	0.001939	1.10	1903.39	1480.69	0.17
FLDPLN2	6635.903	100-Yr	1600.00	33.56	37.10		37.23	0.011883	2.95	542.53	376.73	0.43
FLDPLN2	6635.903	500-Yr	3900.00	33.56	38.59		38.66	0.007682	2.20	1770.27	1371.02	0.34
FLDPLN2	6557.074	100-Yr	1600.00	32.08	35.06	34.81	35.64	0.039210	6.07	263.44	196.56	0.81
FLDPLN2	6557.074	500-Yr	3900.00	32.08	37.05	36.29	37.50	0.034855	5.39	723.82	638.77	0.75
FLDPLN2	6207.832	100-Yr	1600.00	28.16	34.97	31.88	34.98	0.000425	0.96	1671.05	800.40	0.09
FLDPLN2	6207.832	500-Yr	3900.00	28.16	36.02	33.41	36.06	0.001352	1.69	2304.40	1070.01	0.17
FLDPLN2	5826.274	100-Yr	1600.00	31.42	34.79	33.55	34.79	0.000562	0.69	2314.18	1434.58	0.10
FLDPLN2	5826.274	500-Yr	3900.00	31.42	35.61	33.76	35.62	0.000964	1.08	3597.91	1701.67	0.13
FLDPLN2	5469.934	100-Yr	1600.00	30.87	34.01	33.82	34.05	0.004414	1.59	1003.96	1005.28	0.26
FLDPLN2	5469.934	500-Yr	3900.00	30.87	34.99	33.82	35.04	0.003445	1.68	2326.65	1486.77	0.24
FLDPLN2	5275.201	100-Yr	1600.00	29.86	32.75	32.75	32.84	0.009265	2.36	679.08	610.01	0.37
FLDPLN2	5275.201	500-Yr	3900.00	29.86	32.75	32.75	33.26	0.055056	5.74	679.05	610.00	0.91
FLDPLN2	4966.466	100-Yr	1600.00	23.32	28.47	25.18	28.47	0.000096	0.42	3765.10	1288.37	0.04
FLDPLN2	4966.466	500-Yr	3900.00	23.32	29.32	25.81	29.33	0.000250	0.80	4889.43	1331.27	0.07
FLDPLN2	4795.967	100-Yr	4900.00	23.67	28.35	26.12	28.38	0.001462	1.40	3500.37	1542.97	0.16
FLDPLN2	4795.967	500-Yr	8800.00	23.67	29.14	26.70	29.20	0.001769	1.86	4732.10	1571.09	0.19
FLDPLN2	4630.757	100-Yr	4900.00	23.59	28.21	25.57	28.23	0.000634	1.02	4784.38	1801.43	0.11
FLDPLN2	4630.757	500-Yr	8800.00	23.59	28.96	26.04	28.99	0.000898	1.44	6131.02	1804.78	0.14
FLDPLN2	4457.768	100-Yr	4900.00	21.63	28.16	24.14	28.17	0.000172	0.67	7265.01	1922.31	0.06
FLDPLN2	4457.768	500-Yr	8800.00	21.63	28.88	24.74	28.90	0.000313	1.02	8651.80	1937.58	0.08
FLDPLN2	4361.739	100-Yr	4900.00	21.33	28.15	23.47	28.16	0.000108	0.58	8383.42	1937.97	0.05
FLDPLN2	4361.739	500-Yr	8800.00	21.33	28.86	23.98	28.87	0.000213	0.90	9761.99	1962.11	0.07
FLDPLN2	4242.864	100-Yr	4900.00	21.65	28.14	23.80	28.14	0.000129	0.63	7792.09	1845.45	0.05
FLDPLN2	4242.864	500-Yr	8800.00	21.65	28.83	24.21	28.84	0.000254	0.97	9074.34	1859.37	0.08
FLDPLN2	4208.0		Ini Struct									
FLDPLN2	4124.176	100-Yr	4900.00	20.88	25.63		25.67	0.001860	1.58	3101.89	1366.17	0.18
FLDPLN2	4124.176	500-Yr	8800.00	20.88	26.36		26.43	0.002486	2.13	4131.66	1444.80	0.22
FLDPLN2	3556.034	100-Yr	4900.00	18.72	25.47		25.47	0.000125	0.69	7092.07	1427.70	0.05
FLDPLN2	3556.034	500-Yr	8800.00	18.72	26.03		26.04	0.000285	1.11	7894.29	1436.96	0.08
FLDPLN2	3250	100-Yr	4900.00	20.23	25.33		25.36	0.000843	1.30	3795.46	1265.27	0.13
FLDPLN2	3250	500-Yr	8800.00	20.23	25.72		25.78	0.001822	2.07	4285.27	1267.12	0.20
FLDPLN2	3200	100-Yr	4900.00	19.83	25.25		25.28	0.000745	1.29	3853.99	1231.77	0.12
FLDPLN2	3200	500-Yr	8800.00	19.83	25.53		25.60	0.001820	2.12	4200.49	1233.20	0.20
FLDPLN2	3150	100-Yr	4900.00	19.93	25.14		25.16	0.000811	1.35	3707.84	1198.15	0.13
FLDPLN2	3150	500-Yr	8800.00	19.93	25.21		25.29	0.002433	2.37	3793.08	1198.53	0.23
FLDPLN2	3125	100-Yr	4900.00	20.00	25.11		25.14	0.000896	1.40	3571.00	1165.11	0.14
FLDPLN2	3125	500-Yr	8800.00	20.00	25.13		25.23	0.002833	2.50	3592.99	1165.22	0.24
FLDPLN2	3100	100-Yr	4900.00	20.00	25.04		25.07	0.001012	1.46	3429.19	1164.70	0.14
FLDPLN2	3100	500-Yr	4900.00	20.00	25.04		25.07	0.001012	1.46	3429.19	1164.70	0.14
FLDPLN2	3075	100-Yr	4900.00	20.00	24.96		24.99	0.001097	1.51	3311.85	1131.41	0.15
FLDPLN2	3075	500-Yr	4900.00	20.00	24.96		24.99	0.001097	1.51	3311.85	1131.41	0.15
FLDPLN2	3050	100-Yr	4900.00	19.67	24.93		24.97	0.001060	1.52	3288.10	1105.94	0.15
FLDPLN2	3050	500-Yr	4900.00	19.67	24.93		24.97	0.001060	1.52	3288.10	1105.94	0.15
FLDPLN2	3025	100-Yr	4900.00	19.55	24.86		24.89	0.001022	1.50	3354.37	1105.90	0.15
FLDPLN2	3025	500-Yr	4900.00	19.55	24.86		24.89	0.001022	1.50	3354.37	1105.90	0.15
FLDPLN2	3000	100-Yr	4900.00	19.47	24.78		24.81	0.001104	1.54	3280.04	1089.07	0.15
FLDPLN2	3000	500-Yr	4900.00	19.47	24.78		24.81	0.001104	1.54	3280.05	1089.07	0.15

SITE

PRE DEVELOPMENT ANALYSIS

HEC-RAS Plan: P04_G04_F04 River: CARMEL_FLDPLN2 Reach: FLDPLN2 (Continued)

Reach	River Sta	Profile	Q Total (cfs)	Min Ch El (ft)	W.S. Elev (ft)	Cnt W.S. (ft)	E.G. Elev (ft)	E.G. Slope (ft/ft)	Vel Chnl (ft/s)	Flow Area (sq ft)	Top Width (ft)	Froude # Chl
FLDPLN2	2975	100-Yr	4900.00	19.00	24.74		24.78	0.001314	1.62	3106.26	1071.62	0.16
FLDPLN2	2975	500-Yr	4900.00	19.00	24.74		24.78	0.001314	1.62	3106.26	1071.62	0.16
FLDPLN2	2950	100-Yr	4900.00	19.00	24.64		24.68	0.001470	1.69	2966.27	1037.46	0.17
FLDPLN2	2950	500-Yr	4900.00	19.00	24.64		24.68	0.001470	1.69	2966.27	1037.46	0.17
FLDPLN2	2925	100-Yr	4900.00	19.00	24.51		24.56	0.001679	1.78	2812.39	1003.36	0.18
FLDPLN2	2925	500-Yr	4900.00	19.00	24.51		24.56	0.001679	1.78	2812.40	1003.36	0.18
FLDPLN2	2900	100-Yr	4900.00	18.98	24.39		24.44	0.001754	1.81	2771.35	1002.93	0.19
FLDPLN2	2900	500-Yr	4900.00	18.98	24.39		24.44	0.001754	1.81	2771.35	1002.93	0.19
FLDPLN2	2850	100-Yr	4000.00	18.63	24.25		24.29	0.001173	1.52	2727.14	968.93	0.15
FLDPLN2	2850	500-Yr	4000.00	18.63	24.25		24.29	0.001173	1.52	2727.15	968.93	0.15
FLDPLN2	2800	100-Yr	4000.00	18.00	24.10		24.15	0.001736	1.81	2281.93	834.84	0.19
FLDPLN2	2800	500-Yr	4000.00	18.00	24.10		24.15	0.001736	1.81	2281.93	834.84	0.19
FLDPLN2	2750	100-Yr	4000.00	20.00	23.70		23.78	0.003669	2.37	1751.80	757.96	0.26
FLDPLN2	2750	500-Yr	4000.00	20.00	23.70		23.78	0.003669	2.37	1751.80	757.96	0.26
FLDPLN2	2538.141	100-Yr	4000.00	13.99	23.23	20.61	23.27	0.001628	1.77	2266.04	760.76	0.18
FLDPLN2	2538.141	500-Yr	4000.00	13.99	23.23	20.61	23.27	0.001628	1.77	2266.05	760.76	0.18
FLDPLN2	2344.412	100-Yr	4000.00	14.89	23.04	20.30	23.06	0.000733	1.33	3005.74	847.83	0.12
FLDPLN2	2344.412	500-Yr	4000.00	14.89	23.04	20.30	23.06	0.000733	1.33	3005.74	847.83	0.12
FLDPLN2	2068.144	100-Yr	4000.00	19.87	22.39	21.72	22.54	0.011801	3.07	1304.29	849.10	0.44
FLDPLN2	2068.144	500-Yr	4000.00	19.87	22.39	21.72	22.54	0.011801	3.07	1304.30	849.10	0.44
FLDPLN2	1863.540	100-Yr	4000.00	16.02	21.29	19.42	21.36	0.003292	2.21	1810.59	740.16	0.25
FLDPLN2	1863.540	500-Yr	4000.00	16.02	21.29	19.42	21.36	0.003292	2.21	1810.54	740.16	0.25
FLDPLN2	1640.295	100-Yr	4000.00	10.07	20.63	17.10	20.71	0.002592	2.19	1825.22	628.41	0.23
FLDPLN2	1640.295	500-Yr	4000.00	10.07	20.63	17.10	20.71	0.002592	2.19	1825.13	628.37	0.23
FLDPLN2	1506.056	100-Yr	600.00	17.00	20.38	18.90	20.39	0.001072	0.83	720.93	549.73	0.13
FLDPLN2	1506.056	500-Yr	600.00	17.00	20.38	18.90	20.39	0.001072	0.83	720.83	549.73	0.13
FLDPLN2	1409.046	100-Yr	600.00	15.78	20.37	16.96	20.37	0.000057	0.32	1848.94	638.53	0.03
FLDPLN2	1409.046	500-Yr	600.00	15.78	20.37	16.96	20.37	0.000057	0.32	1848.82	638.52	0.03
FLDPLN2	1265.284	100-Yr	600.00	15.49	20.34	18.31	20.35	0.000576	0.72	833.02	494.01	0.10
FLDPLN2	1265.284	500-Yr	600.00	15.49	20.34	18.31	20.35	0.000576	0.72	832.93	494.00	0.10
FLDPLN2	1083.656	100-Yr	400.00	15.57	19.12	19.12	20.01	0.061202	7.56	52.94	29.84	1.00
FLDPLN2	1083.656	500-Yr	400.00	15.57	19.12	19.12	20.01	0.061202	7.56	52.94	29.84	1.00
FLDPLN2	822.160	100-Yr	300.00	13.83	17.50	15.31	17.51	0.000880	0.94	319.37	174.98	0.12
FLDPLN2	822.160	500-Yr	800.00	13.83	18.26	16.03	18.31	0.002313	1.73	462.83	209.07	0.20
FLDPLN2	574.442	100-Yr	600.00	11.60	16.67	15.15	16.76	0.009081	2.34	256.68	205.69	0.37
FLDPLN2	574.442	500-Yr	800.00	11.60	17.72	15.48	17.75	0.002142	1.55	515.12	257.96	0.19
FLDPLN2	340.867	100-Yr	600.00	10.07	15.99	12.41	16.01	0.001554	1.25	478.85	260.20	0.16
FLDPLN2	340.867	500-Yr	800.00	10.07	17.55	12.80	17.56	0.000407	0.84	950.11	343.16	0.09

HARO, KASUNICH AND ASSOCIATES, INC

CONSULTING GEOTECHNICAL & COASTAL ENGINEERS

Project Number M10961
21 December 2015

Joy Berry
Carmel River Inn, LLC
P.O. Box 1796
Carmel, California 93924

Subject: Liquefaction Update Letter

Reference: Carmel River Inn Proposed New Units Phase One
US Highway 1 and Carmel River Bridge
26600 Oliver Road, Carmel, California 93923
P.O. Box 221609, Carmel, California 93922
APN 009-563-03

Dear Ms. Berry,

Haro, Kasunich and Associates are pleased to submit this letter which updates potential liquefaction and lateral spreading issues for the currently proposed project.

Our firm discussed the project with Craig Ziel of Tetra Tech (Civil Engineer) and reviewed the preliminary layout: Sheet G-1 by Paul Davis Partnership/Tetra Tech (print date 22 November 2015); and reviewed two documents prepared by D&M Consulting and Engineers, Inc. for an earlier version of the project:

- Liquefaction Study dated 24 November 2004
- Preliminary Geological Investigation dated 11 March 2004

Previous work on this project by our office includes consulting in 2006. We did work in 1986 at the property as well.

We understand the project will consist of 22 new mobile units and associated access and parking improvements. Liquefaction and lateral spreading mitigation measures will be incorporated into the project.

Based on review of the D&M reports, they indicate that the site has a high potential for liquefaction and lateral spreading at the project site. Specifically they suggest the potential for liquefaction extends to a depth of about 35 feet. Their investigation method and analysis is currently commonly used and is considered still valid. However, the earthquake acceleration value used in their analysis is based on a maximum probable earthquake event with a "10% percent chance of being exceeded in 50 years". Today we use an earthquake acceleration value equivalent to that with a "2% probability of structural collapse in 50 years". This usually results in a higher acceleration value which would offer more conservative results. In this case, a deeper column (greater than 35 feet) of potentially liquefiable soil might occur. Either way the mitigation efforts are the same assuming surficial mitigative efforts rather than deep mitigative improvements are explored.

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We have performed, and are aware of, other liquefaction studies in the immediate vicinity of the referenced project. Based on our experience and knowledge in the vicinity of the project, we find the conclusions in the D&M report to be reasonable.

As discussed in their report, potential mitigation efforts could be accomplished in some combination of soil improvement and structural foundation accommodation. The proposed mobile wheeled units may suffice to some degree for the structural counterpart; however more discussion of this is warranted. Due to the close proximity of adjacent neighborhood improvements and high cost, deep soil densification is not a typical soil improvement option for this type of project. However, surficial soil removal and replacement with an engineered, reinforced, re-densified earth mat (depth and thickness to be determined) constructed beneath proposed units and access driveways, could be explored further as a possible option. In this way, the engineered earth mat which would support the units and egress routes atop it, could suffer some distress but essentially "float" over the liquefied zone beneath and diminish differential settlement. Also this earth mat system could be designed to be deep enough to mitigate the potential for lateral spreading of the nearby river bank to encroach beneath the proposed improvements.

We do not think there is a benefit to re-doing the field investigation of the liquefaction study. However, additional cross-section work and lateral spreading/ liquefaction analysis will be necessary. Additional work must also include discussing and vetting of allowable mitigation options versus acceptable risk with the owners and design team to determine viable options for further evaluation. Project-specific recommendations can then be developed for the project and included in a design-level geotechnical report.

We appreciate this opportunity to be of service to you on this project.



Respectfully Submitted,
HARO, KASUNICH AND ASSOCIATES, INC.

Vicki Odello

Vicki Odello
C.E. 52651 exp. 12/2016

VCO/vco

Copies: PDF emailed to Craig Ziel with Tetra Tech
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