Carmel Legacy Hotel Response to Appeal to the City Council and Recommended Evidence for a Class 32 Categorical Exemption

On behalf of the applicant, EMC Planning Group staff conducted a review and evaluation of the project, the appeal to the City Council, conducted research regarding the applicability of the Class 32 categorical exemption, and presents the following:

Project Description

The project site is currently occupied by the Hofsas House Hotel, a 36,200 square foot building site comprised of two legal lots of record, an 8,000 square foot lot (Block 34, Lots 1 & 3, APN 010-124-001) and a 28,200 square foot lot (Block 34, Lots 5, por. of 7, por. of 8, 9, 10, por. of 11, 12, 14, APN 010-124-014). The project site totals 36,200 square feet or 0.83 acres. The hotel, as it is known today, was constructed in 1957 and expanded in 1968. The Donna Hofsas House is located on the larger of the two parcels, fronting Dolores Street, and was constructed in 1960.

The project includes demolishing the 38-room Hofsas House Hotel and building a new hotel, Carmel Legacy Hotel. There would be no increase in the number of hotel rooms.

Response to the Appeal

Introduction

The appeal was filed on April 24, 2024, and includes Attachment A and Attachment B, with the appellant's arguments that the project should not be categorically exempt under Class 32 of the CEQA Guidelines.

Section 21084 of the Public Resources Code requires the CEQA Guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA. In response to that mandate, the California Secretary for Resources has found that 33 classes of projects, which are listed in the CEQA Guidelines, do not have a significant effect on the environment, and they are declared to be categorically exempt from the requirement for the preparation of environmental documents. Therefore, the Secretary for Resources has found that the environmental impacts associated with projects that fall into these classes are not significant.

The city has used the following categorical exemption associated with approval of the project:

15332. In-fill Development Projects

> Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.
>
> (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
>
> (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
>
> (c) The project site has no value as habitat for endangered, rare or threatened species.
>
> (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
>
> (e) The site can be adequately served by all required utilities and public services.

Response to Appeal's Claim that Class 32 Exemption Does Not Apply

The following are responses to the claims in Attachments A and B of the appeal. In summary, the appellant does not provide any support to the claim that the Class 32 exemption does not apply because there are unusual circumstances that qualify for an exception to the exemption.

Attachment A

Attachment addresses A what the appellant refers to as "unusual circumstances making the categorical exemption inappropriate, particularly in regard to the demolition and construction phase." The appellant presents the following circumstances:

1. *The proposed project is surrounded by residential dwellings which will be subjected to significant construction noise, and traffic, particularly during excavation for the parking structure, and air quality impacts from dust, diesel exhaust and potentially, asbestos.*
2. *Given the quantity of dirt to be removed for the parking structure, and the amount of cement needed to build the project, the truck traffic with attendant noise, traffic impacts, and air quality impacts, will be significant along the entire truck route through the town from the construction site to the highway. This could also adversely impact emergency vehicle traffic.*

Response to 1 and 2. For clarification, the project site is surrounded by a residential neighborhood to the north; Svendsgaard's Inn and 4th Avenue to the south; San Carlos Street, Pine Terrace Condominiums and Hotel Carmel to the east; and Carmel County Inn, Dolores Street, and a residential neighborhood to the west. There is nothing unusual regarding air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise associated with demolition and construction activities associated with the project. Typical demolition activities

include all necessary actions to remove existing structures including parking lots from the site. Typical construction activities include grading and the import or export of soil, and the use of cement in the construction of parking structures (above ground or below ground), and the construction of new buildings and associated infrastructure. Soil removal and the use of cement are typical activities that occur during demolition and construction activities.

Regarding hazards, the city's standard condition of approval, which was applied to the project states, "Hazardous Materials Waste Survey. Prior to the issuance of a demolition permit, the Applicant shall submit a hazardous materials waste survey to the Building Division in conformance with the Monterey Bay Unified Air Pollution Control District." This addresses the issues of asbestos and other toxins associated with demolition of the existing structures. Regarding construction traffic, the city's standard condition of approval, which was applied to the project states, "Truck Haul Route. Prior to the issuance of a building permit, the Applicant shall submit for review and approval by the Community Planning & Building Director, in consultation with the Public Works and Public Safety Departments, a truck-haul route and any necessary traffic control measures for the grading activities. The Applicant shall be responsible for ensuring adherence to the truck-haul route and implementation of any required traffic control measures." Regarding construction noise, the city's General Plan/Local Coastal Plan includes policy P9-4 "Ensure that construction activities are managed to minimize overall noise impacts on surrounding land uses." Additionally, Municipal Code section 15.08.180, limits the hours of construction to between 8:00 a.m. and 6:30 p.m.

Therefore, there would be no significant impacts associated with air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise and there are no unusual circumstances associated with the project's demolition and construction activities.

3. *The historic façade of the building will be lost unnecessarily. One more piece of Carmel's history obliterated.*

Response to 3. A review of the property was conducted by five separate qualified professionals: Chattel Inc., Historic Preservation Consultants (October 16, 2023), Heritage Services Consulting (October 23, 2023), Modern Resources (October 16, 2023), Kent Seavey (November 12, 2023), and Dr. Anthony Kirk (September 11, 2023 and September 2022). All reports concluded the existing hotel is not a significant historic resource and is not eligible for listing in the City Inventory or the California Register. The City contracted with Ms. Margaret Clovis, a qualified professional to perform an intensive survey of the Hofsas House Hotel. The DPR report submitted by Ms. Clovis concluded that the Hofsas House Hotel does not meet any of the California Register criteria and is not eligible for listing in the Carmel Inventory of Historic Resources in a DPR report. Subsequently, on December 18, 2023, the City of Carmel-by-the-Sea Historic Resources Board determined that the Hofsas House Hotel does not constitute a historic resource. No appeal of that determination was filed within the time allowed by law.

4. *The plan views are incomplete and fail to accurately portray the building as proposed. In this regard the height limit needs to be accurately assessed on this sloping site.*

   Response to 4. The height of the new building was determined to be consistent with the city's zoning regulations. Therefore, there are no unusual circumstances associated with the height of the new building. The proposed height of the building projections was simulated with flagging. Height measurements of (6) six points were measured and verified to accurately reflect the height proposed on the planset, by an affidavit signed by a licensed land surveyor, per the City's Story Pole Certification Policy.

5. *The west side proposes an increase in glass compared to that existing with consequences for the neighbors from increased reflective glare.*

   Response to 5. The use of glass in commercial structures such as a hotel is not an unusual circumstance.

6. *The impact on parking opportunities during demolition and construction.*

7. *This project is located between two major streets which serve as ingress and egress to the Village. Where will the construction workers and construction vehicles park and how will they navigate through this very congested part of town. [sic] The traffic and circulation of these major demolition and construction vehicles, dump trucks, cement mixers, etc. has not been addressed. We have two inns sharing same the [sic] city block with Hofsas and two more on Fourth Avenue, one at [sic] intersection with San Carlos and the other at the intersection with Dolores. This area contains multiple inns and is also a residential neighborhood that will be heavily impacted by the project traffic.*

   Response to 6 and 7. It is not unusual for demolition and construction traffic to have a temporary effect on the availability of on-street parking. Additionally, the city's Municipal Code section 15.08.190 Parking During Construction states, "The parking of construction vehicles in any posted time-limited zone is prohibited unless a construction parking permit has been issued by the City." Municipal Code section 15.08.210, Use of Public Right-of-Way states, "When at any time any construction interferes with the use of any portion of the public right-of-way, a temporary encroachment permit therefor shall first be obtained and all necessary protection devices shall be installed. Such devices shall include, but may not be limited to: barricades, pedestrian walkways, guardrails, signs, lighting, etc. Said permit shall be obtained from the Department of Community Planning and Building and shall be approved by the Community Planning and Building Department in conjunction with the Director of Public Works. The fee for said permit shall be as established from time to time by resolution of the City Council. Temporary encroachment permits shall be limited in duration to 48 hours unless a longer time period is specifically approved by the Directors of Planning and Building and Public Works. Temporary encroachment permits shall not be issued to allow storage of construction materials

and/or equipment in the public right-of-way unless it can be demonstrated that a significant hardship exists that prevents material storage elsewhere on the site."

Additionally, the city has included the following condition of approval associated with construction: "Construction Management Plan. Prior to the issuance of a building permit, the Applicant shall submit a Construction Management Plan for review and approval by the Community Planning & Building Director."

Therefore, temporary impacts on the availability of parking opportunities does not constitute an unusual circumstance.

Attachment B

1. *Regarding inconsistency with the way similar past projects were analyzed in EIRs. The appellant argues that the city prepared EIRs for three projects that included demolition of existing and old commercial structures followed by construction of new commercial structures in their places.* However, they don't provide any evidence that those three projects were categorically exempt. Even if one or more of those projects were categorically exempt, preparing an EIR for those project(s) would not require the city to prepare EIRs on other projects that are categorically exempt. In summary, preparing EIRs on past projects does not affect the exempt status of other projects, include the Carmel Legacy Hotel project.

2. *Regarding the definition of "infill development." The appellant argues that the Office of Planning and Research defines infill development as follows: "The term 'infill development' refers to building within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas. Infill development is critical to accommodating growth and redesigning our cities to be environmentally- and socially-sustainable."* CEQA Guidelines section 15332 defines In-Fill Development Projects for purposes of this exemption, namely, that the project be substantially surrounded by urban uses. This project meets section 15332.

3. *Regarding surrounding land uses. The appellant argues that an EIR should be prepared because the project site is surrounded by residential neighborhoods, including numerous residents that live in homes directly across the street. They, as well as residents living along the truck routes will be subject to demolition and construction-related impacts.* For clarification, the project site is surrounded by a residential neighborhood to the north; Svendsgaard's Inn and 4th Avenue to the south; San Carlos Street, Pine Terrace Condominiums and Hotel Carmel to the east; and Carmel County Inn, Dolores Street, and a residential neighborhood to the west. By its very characterization of in-fill developments projects, CEQA Guidelines section 15332 states that the proposed development must occur within city limits on a project site of no more than five acres substantially surrounded by urban uses. The are no unusual circumstances associated with the project being surrounded by existing commercial and residential uses.

4. *Regarding public health and safety impacts. The appellant implies that residents in the vicinity could be exposed to air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise.* There is nothing unusual regarding air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise associated with demolition and construction activities associated with the project. Typical demolition activities include all necessary actions to remove existing structures including parking lots from the site. Typical construction activities include grading and the import or export of soil, construction of parking structures (above ground or below ground), and construction of new buildings and associated infrastructure. These are typical activities that occur during demolition and construction activities.

   Regarding hazards, the city's standard condition of approval, which was applied to the project states, Hazardous Materials Waste Survey. Prior to the issuance of a demolition permit, the Applicant shall submit a hazardous materials waste survey to the Building Division in conformance with the Monterey Bay Unified Air Pollution Control District." This addresses the issues of asbestos and other toxins associated with demolition of the existing structures. Regarding construction traffic, the city's standard condition of approval, which was applied to the project states, "Truck Haul Route. Prior to the issuance of a building permit, the Applicant shall submit for review and approval by the Community Planning & Building Director, in consultation with the Public Works and Public Safety Departments, a truck-haul route and any necessary traffic control measures for the grading activities. The Applicant shall be responsible for ensuring adherence to the truck-haul route and implementation of any required traffic control measures." Regarding construction noise, the city's General Plan/Local Coastal Plan includes policy P9-4 "Ensure that construction activities are managed to minimize overall noise impacts on surrounding land uses." Therefore, there would be no significant impacts associated with air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise and there is nothing unusual about the demolition and construction activities associated with the project.

   The replacement of the hotel will address structural and engineering issues with the existing hotel, as described in the attached report from KPFF Consulting Engineers.

Categorical Exemption and Recommended Evidence

The project appears to qualify under the following four exemption categories:

- Class 32, In-fill Development
- Class 2, Replacement or Reconstruction
- Class 3, New Construction or Conversion of Small Structures
- Class 31, Historical Resource Restoration/Rehabilitation

The applicability of each class to the project is discussed below.

Class 32, In-fill Development Categorical Exemption

The project qualifies for a categorical exemption under Article 19, Section 15332 of the California Environmental Quality Act (CEQA).

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

Evidence. The April 10, 2024 staff report to the Planning Commission provides the evidence that the project is consistent with the applicable general plan designation and with applicable zoning designation and regulations. The project is consistent with the following General Plan Polices noted in the City's Land Use Element:

G1-2 Preserve the residential village character and perpetuate a balance of land uses compatible with local resources and the environment.

> P1-5 Preserve the development pattern established in the commercial area with a central core area of ground floor retail and service activities surrounded by a less intensive buffer area of residential, motels, offices and other uses.
>
> *The project is sited adjacent to the Commercial District in (RC) Residential and Limited Commercial Zoning.*

O1-6 Recognize the natural resources and scenic quality of Carmel as a coastal community and allow uses in the community that are consistent with local needs, the Carmel Local Coastal Plan, and the California Coastal Act

> P1-27 Continue to ensure that development, whether commercial or residential, does not diminish the village character by excessively blocking important public or private views and disturbing natural topography, mature trees, or native growth.
>
> *The project is lower in height, and expands surrounding viewsheds.*

G1-3 Recognize the qualities and attributes that make up the unique architectural character of Carmel, retain these qualities in existing buildings, and encourage the use of them in new structures.

> O1-10 Apply design regulations for the commercial district that will protect its established character while supporting the land uses contained therein.
>
> *The project's design was evaluated and unanimously approved, by the Planning Commission who confirming the design is in alignment with the City of Carmel's Commercial Design Guidelines*

(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

Evidence. The project site is 0.83 acres, located within the city limits of Carmel-by-the-Sea, and is completely surrounded by urban uses. The project site is surrounded by a residential neighborhood to the north; Svendsgaard's Inn and 4th Avenue to the south; San Carlos Street, Pine Terrace Condominiums and Hotel Carmel to the east; and Carmel County Inn, Dolores Street, and a residential neighborhood to the west.

(c) The project site has no value as habitat for endangered, rare or threatened species.

Evidence. The project site is completely developed with structures and parking lots and within the developed city of Carmel-by-the-Sea. Janet Walther, MS, EMC Planning Group principal biologist reviewed the project site and the California Natural Diversity Database and concluded that the project site has no value as habitat for endangered, rare or threatened species.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality Construction Traffic), or water quality.

Evidence - Traffic. A vehicle miles traveled (VMT) study was conducted by Hexagon Transportation Consultants in November 2023 to determine if the project would result in significant traffic effects as defined by CEQA. In summary, the study concluded that the project would replace an existing hotel facility consisting of 38 rooms and on-site amenities with a proposed hotel facility consisting of 38 rooms and on-site amenities. The proposed hotel would presumably accommodate the same number of guests as the existing hotel. Therefore, it is anticipated that the proposed hotel project would generate no more than the number of vehicle trips currently generated by the existing Hofsas House Hotel. As a result of the project generating or attracting fewer than 110 net new trips per day, it can be presumed that the proposed project would have a less-than-significant impact on VMT based on OPR's VMT screening criteria. Therefore, approval of the project would not result in any significant effects relating to traffic. Prior to construction, a Construction Mobilization plan will be prepared and submitted with construction plans. The plan will detail the following: shuttle schedule and off-site parking plans for construction worker transportation to and from the job site. Noise mitigation measures, material delivery and removal, and hazardous waste removal will also be addressed.

Evidence – Noise. The project would be developed within the existing commercial and residential neighborhoods and would be required to comply with city noise regulations, which includes the city's General Plan/Local Coastal Plan policy P9-4 "Ensure that construction activities are managed to minimize overall noise impacts on surrounding land uses" and the Municipal Code 15.08.180, which limits the hours of construction to between 8:00 a.m. and 6:30 p.m. Therefore, construction of the project would not result in any significant effects relating to noise.

Evidence – Air Quality. Construction-related air quality impacts are short-term in nature and therefore are not considered significant. Additionally, the project is required to comply with all applicable local, regional, state, and federal regulations associated with demolition and construction of buildings. Regarding long-term air quality impacts associated with vehicle use, the new Carmel Legacy Hotel project will have the same number of hotel rooms as the existing Hofsas House hotel and, as documented in the traffic report prepared by Hexagon Transportation Consultants (and discussed above). Therefore, there would be no increase in existing long-term air quality impacts.

Evidence – Water Quality. Development of the project will be required to comply with the city's grading ordinance, which requires drainage and erosion controls be in place prior to, and during, all work (Municipal Code 15.08.200 Grading). The project will also comply with the State Water Resources Control Board's applicable construction stormwater general permit. Therefore, demolition of the existing hotel and construction of the new hotel would not result in significant water quality impacts.

Therefore, the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

(e) The site can be adequately served by all required utilities and public services.

Evidence. The existing on-site hotel is adequately served by required utilities and public services, including but not limited to water, wastewater, gas and electricity, and fire and police protection. Therefore, the Carmel Legacy hotel with the same number of guest rooms would also be adequately served by required utilities and public services.

Class 2, Replacement or Reconstruction Categorical Exemption

The project also appears to be exempt under 15302, Replacement or Reconstruction, which states:

> Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to:
>
> (a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.
>
> (b) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.
>
> (c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.
>
> (d) Conversion of overhead electric utility distribution system facilities to underground including connection to existing overhead electric utility

distribution lines where the surface is restored to the condition existing prior to the undergrounding.

Evidence. The project is the replacement of an existing hotel (Hofsas House Hotel) with 38 guest rooms, with a new hotel (Carmel Legacy Hotel) with 38 guest rooms. The replacement hotel will be located on the same site as the hotel replaced and will have substantially the same purpose and capacity as the structure replaced; i.e. a 38-room hotel. Additionally, the new hotel is substantially the same size (square footage and height) as documented in the supplemental FAR and Square Footage calculations document provided by Eric Miller Architect's office. The purpose of the project remains consistent (hotel to hotel), and there is no change to room capacity (38 rooms to 38 rooms).

Class 3, New Construction or Conversion of Small Structures Categorical Exemption

The Donna Hofsas House component of the project is also exempt under 15303, New Construction or Conversion of Small Structures which states:

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

(a) One single-family residence, or a second dwelling unit in a residential zone. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.

(b) A duplex or similar multi-family residential structure, totaling no more than four dwelling units. In urbanized areas, this exemption applies to apartments, duplexes and similar structures designed for not more than six dwelling units.

(c) A store, motel, office, restaurant or similar structure not involving the use of significant amounts of hazardous substances, and not exceeding 2500 square feet in floor area. In urbanized areas, the exemption also applies to up to four such commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.

(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.

(e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

(f) An accessory steam sterilization unit for the treatment of medical waste at a facility occupied by a medical waste generator, provided that the unit is installed and operated in accordance with the Medical Waste Management Act (Section 117600, et seq., of the Health and Safety Code) and accepts no offsite waste.

Evidence: A portion of the project proposes to renovate the Donna Hofsas House by adding conference and exercise facilities to its interior. The project proposes minor modifications to the exterior, with the potential for no exterior changes at all. The conversion of the existing small house from residential use to multiple uses qualifies the project for this exemption.

Class 31, Historical Resource Restoration/Rehabilitation Categorical Exemption

The Donna Hofsas House component of the project is also exempt under 15331, Historical resource Restoration/Rehabilitation which states:

Class 31 consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer.

Evidence: The restoration and conservation of the Donna Hofsas House will be completed in a manner consistent with the Secretary of the Interior's Standards, and therefore qualifies for this exemption.

Exceptions to Categorical Exemptions

Section 15300.2 of the CEQA Guidelines lists exceptions that would prohibit a project from qualifying for a Categorical Exemption, even if the project satisfies the requirements for one or more of the exemption classes. On behalf of the applicant, EMC Planning Group, conducted a review and evaluation of the project and conducted research. Based on its review, EMC Planning Group concluded that none of the exceptions listed in CEQA Guidelines section 15300.2 (a-f) apply to the project (discussed below). Therefore, a Categorical Exemption is appropriate pursuant to CEQA Guidelines Section 15302.

a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

Discussion. The project qualifies for a Class 32 exemption and therefore, the location exception does not apply to the project. The project also qualifies for a Class 3 exemption, and the Donna Hofsas House renovation will not impact an environmental resource of hazardous or critical

concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

Discussion. There are no successive projects of the same type in the same place planned. Therefore, there is no cumulative impact that would be significant. In addition, because the impacts of replacing the Hotel with a similarly sized hotel are less than significant with this project, it is not expected that any future project to replace the new Hotel with another Hotel of similar size would be cumulatively significant.

c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

Discussion. There is no reasonable possibility that the project would have a significant effect on the environmental due to unusual circumstances, based upon the following substantial evidence:

- The project site is surrounded by a residential neighborhood to the north; Svendsgaard's Inn and 4th Avenue to the south; San Carlos Street, Pine Terrace Condominiums and Hotel Carmel to the east; and Carmel County Inn, Dolores Street, and a residential neighborhood to the west. By its very characterization of in-fill developments projects, CEQA Guidelines section 15332 states that the proposed development must occur within city limits on a project site of no more than five acres substantially surrounded by urban uses. The are no unusual circumstances associated with the project being surrounded by existing commercial and residential uses.

- There is nothing unusual regarding air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise associated with demolition and construction activities associated with the project. Typical demolition activities include all necessary actions to remove existing structures including parking lots from the site. Typical construction activities include grading and the import or export of soil, and the use of cement in the construction of parking structures (above ground or below ground), and the construction of new buildings and associated infrastructure. Soil removal and the use of cement are typical activities that occur during demolition and construction activities.

  Regarding hazards, the city's standard condition of approval, which was applied to the project states, "Hazardous Materials Waste Survey. Prior to the issuance of a demolition permit, the Applicant shall submit a hazardous materials waste survey to the Building Division in conformance with the Monterey Bay Unified Air Pollution Control District." This addresses the issues of asbestos and other toxins associated with demolition of the existing structures. Regarding construction traffic, the city's standard condition of approval,

which was applied to the project states, "Truck Haul Route. Prior to the issuance of a building permit, the Applicant shall submit for review and approval by the Community Planning & Building Director, in consultation with the Public Works and Public Safety Departments, a truck-haul route and any necessary traffic control measures for the grading activities. The Applicant shall be responsible for ensuring adherence to the truck-haul route and implementation of any required traffic control measures." Regarding construction noise, the city's General Plan/Local Coastal Plan includes policy P9-4 "Ensure that construction activities are managed to minimize overall noise impacts on surrounding land uses." Additionally, Municipal Code section 15.08.180, limits the hours of construction to between 8:00 a.m. and 6:30 p.m.

Therefore, there would be no significant impacts associated with air pollutants, asbestos, other toxins, diesel exhaust, truck traffic and noise and there are no unusual circumstances associated with the project's demolition and construction activities.

- The height of the new building was determined to be consistent with the city's zoning regulations. Therefore, there are no unusual circumstances associated with the height of the new building.
- The use of glass in commercial structures such as a hotel is not an unusual circumstance.
- It is not unusual for demolition and construction traffic to have a temporary effect on the availability of on-street parking. Additionally, the city's Municipal Code section 15.08.190 Parking During Construction states, "The parking of construction vehicles in any posted time-limited zone is prohibited unless a construction parking permit has been issued by the City." Municipal Code section 15.08.210, Use of Public Right-of-Way states, "When at any time any construction interferes with the use of any portion of the public right-of-way, a temporary encroachment permit therefor shall first be obtained and all necessary protection devices shall be installed. Such devices shall include, but may not be limited to: barricades, pedestrian walkways, guardrails, signs, lighting, etc. Said permit shall be obtained from the Department of Community Planning and Building and shall be approved by the Community Planning and Building Department in conjunction with the Director of Public Works. The fee for said permit shall be as established from time to time by resolution of the City Council. Temporary encroachment permits shall be limited in duration to 48 hours unless a longer time period is specifically approved by the Directors of Planning and Building and Public Works. Temporary encroachment permits shall not be issued to allow storage of construction materials and/or equipment in the public right-of-way unless it can be demonstrated that a significant hardship exists that prevents material storage elsewhere on the site."

- Additionally, the city has included the following condition of approval associated with construction: "Construction Management Plan. Prior to the issuance of a building permit, the Applicant shall submit a Construction Management Plan for review and approval by the Community Planning & Building Director."
- Therefore, temporary impacts on the availability of parking opportunities does not constitute an unusual circumstance.

d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

Discussion. According to the Caltrans Scenic Highway System Map website, the nearest scenic highway is State Route 1, which is located approximately ½ mile east of the project site. The project site is not visible from the highway. Therefore, no officially designated scenic highways, or scenic resources, would be affected as a result of the project.

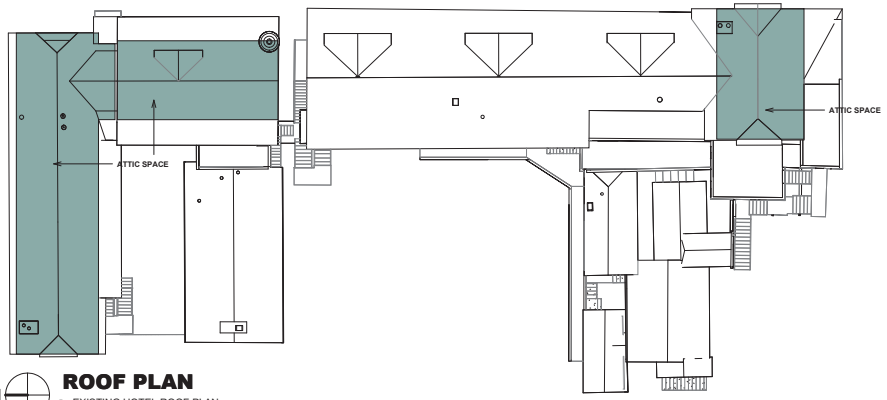
e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Discussion. The project is not located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code. Each were checked and are discussed herein. The site is not listed on the California Environmental Protection Agency's Cortese List (Health and Safety Code Section 25187.5). The State Water Resources Control Board's GeoTracker (Health and Safety Code Section 25295 and Water Code Sections 13273 and 13301) does not indicate any hazardous sites within the project site. The project site is also not listed on the California Environmental Protection Agency's list of solid waste sites identified by the Water Board with waste constituents above hazardous waste levels outside the waste management unit (Health and Safety Code Section 116395).

f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

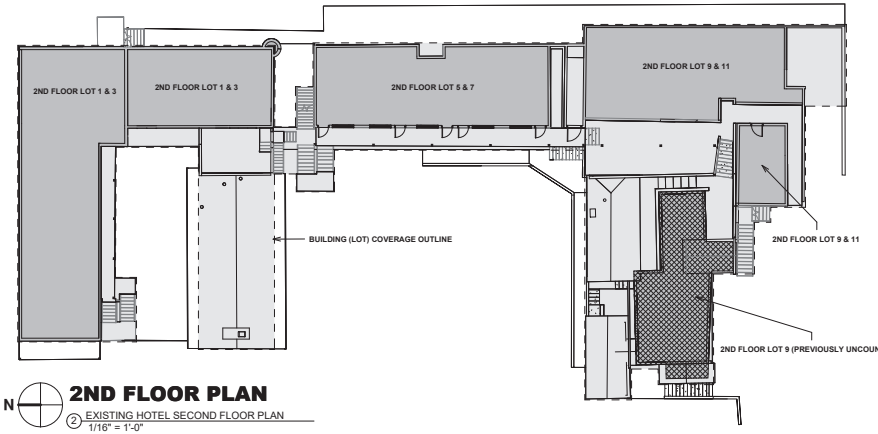
Discussion. A review of the property was conducted by Chattel Inc., Historic Preservation Consultants (October 16, 2023), and concluded the existing hotel is not a significant historic resource and is not eligible for listing in the City Inventory or the California Register. Subsequently, on December 18, 2023, the City of Carmel-by-the-Sea Historic Resources Board determined that the Hofsas House hotel does not constitute a historic resource. The Historic Resources Board's determination was not appealed within 10 days of the Board's decision and so that decision is now final and conclusive. (Carmel-by-the-Sea Municipal Code § 17.54.010(B).)

With respect to the House, the renovation project will not cause a substantial adverse change in the significance of this historical resource because it will not significantly affect the exterior of the House and the interior renovations will be conducted consistently with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer.



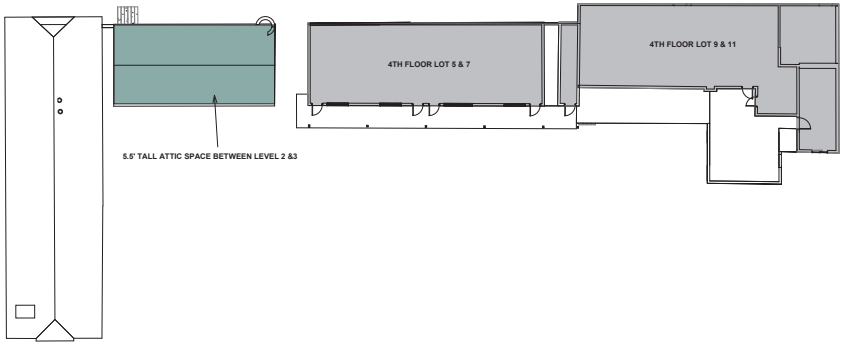
ROOF PLAN

5 EXISTING HOTEL ROOF PLAN
1/16" = 1'-0"



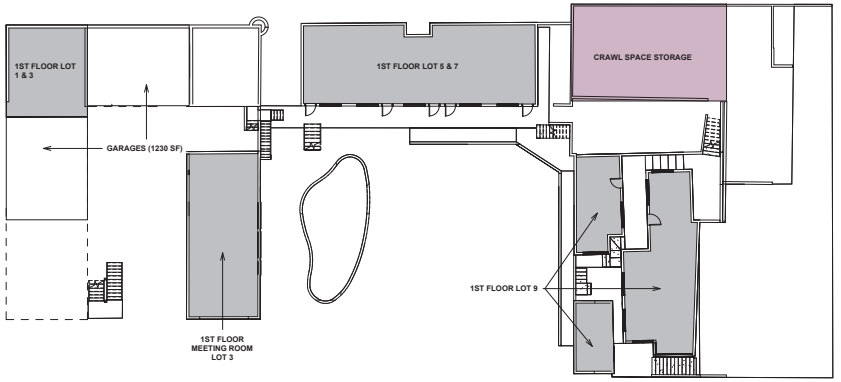
2ND FLOOR PLAN

2 EXISTING HOTEL SECOND FLOOR PLAN
1/16" = 1'-0"



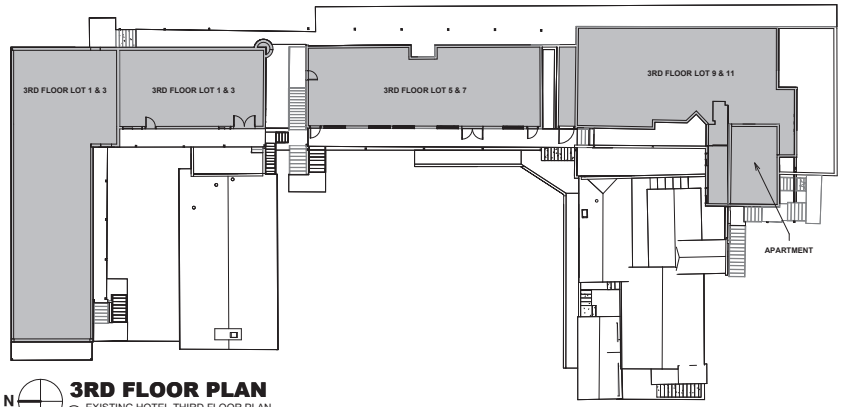
4TH FLOOR PLAN

1 EXISTING HOTEL FOURTH FLOOR PLAN
1/16" = 1'-0"



1ST FLOOR PLAN

3 EXISTING HOTEL FIRST FLOOR PLAN
1/16" = 1'-0"



3RD FLOOR PLAN

4 EXISTING HOTEL THIRD FLOOR PLAN
1/16" = 1'-0"

(E) ADDITIONAL FLOOR AREA

ATTIC STORAGE (OVER 5.5') -	4,778 S.F.
CRAWL SPACE STORAGE (OVER 5.5') -	1,117 S.F.
2ND FLOOR LOT 9 -	895 S.F.
TOTAL EXTRA FLOOR AREA-	**6,790 S.F.**

EXISTING FLOOR AREA-	23,744 S.F.
ADDITIONAL FLOOR AREA -	6,790 S.F.
TOTAL EXISTING FLOOR AREA-	**30,534 S.F.**
TOTAL PROPOSED FLOOR AREA-	**32,466 S.F.**
DIFFERENCE:	**1,932 S.F. OR 5%**

FLOOR PLATE OUTLINE
BUILDING (LOT COVERAGE)

(E) LOT COVERAGE)

HOFSAS HOTEL	11,959 S.F.
HOFSAS HOUSE	1,809 S.F.
TOTAL COVERAGE	13,768 S.F.
	38%

(E) FAR Schedule

Type	Area	Site Area	FAR
1st Floor Lot 1 & 4	555 SF	36200 SF	0.02
1st Floor Lot 5 & 7	1443 SF	36200 SF	0.04
1st Floor Lot 9	1415 SF	36200 SF	0.04
1st Floor Meeting Room Lot 3	919 SF	36200 SF	0.03
2nd Floor Lot 1 & 3	1987 SF	36200 SF	0.05
2nd Floor Lot 1 & 3	903 SF	36200 SF	0.02
2nd Floor Lot 5 & 7	1443 SF	36200 SF	0.04
2nd Floor Lot 9 & 11	1810 SF	36200 SF	0.05
3rd Floor Lot 1 & 3	1987 SF	36200 SF	0.05
3rd Floor Lot 1 & 3	884 SF	36200 SF	0.02
3rd Floor Lot 5 & 7	1444 SF	36200 SF	0.04
3rd Floor Lot 9 & 11	2133 SF	36200 SF	0.06
4th Floor Lot 5 & 7	1461 SF	36200 SF	0.04
4th Floor Lot 9 & 11	2052 SF	36200 SF	0.06
Apartment	311 SF	36200 SF	0.01
Residence Lower Floor	1501 SF	36200 SF	0.04
Residence Upper Floor	1494 SF	36200 SF	0.04
TOTAL: 17	23744 SF		0.66 65.5 %

Legend 1
1/8" = 1'-0"

REVISION	No.

CONSULTANT:

ARCHITECT:
ERIC MILLER ARCHITECTS, INC.
211 HOFFMAN AVENUE MONTEREY, CA 93940
PHONE (831) 372-0410 ■ FAX (831) 372-7840 ■ WEB: ericmillerarchitects.com

EXISTING HOTEL PLANS
Job Name: HOFSAS HOUSE LEGACY
2NW of 4th Ave. on San Carlos St.
CARMEL-BY-THE-SEA
A.P.N. 010-124-010 & 014

DATE:	5/8/2024
SCALE:	As indicated
DRAWN	CS
JOB NO.	2214

A-3
SHEET OF

45 Fremont Street, 28th Floor San Francisco, CA 94105 415.989.1004 kpff.com

Visual Assessment and Evaluation
Hofsas House Hotel

Carmel, CA

Prepared by:

KPFF Consulting Engineers
San Francisco, CA
May 21, 2024

Table of Contents

1. Scope of Report

This report presents the findings of the visual assessment and evaluation of the Hofsas House Hotel, located in Carmel, California. The objective of this study was to perform a visual conditions assessment, noting deficiencies encountered, and a qualitative structural review of the buildings along with a civil assessment of the site.

The following tasks outline the scope of work that was performed for the structural evaluation of the building:

1. Review of available original structural and architectural drawings provided by the Client.
2. Walkthrough visual survey of the building exteriors to further understand and verify existing conditions, construction, systems, and finishes.
3. Walkthrough visual civil site survey of the exterior site including parking facilities, pedestrian access facilities, site amenities, and visible surface indications of utilities.
4. Prepare a letter report summarizing the results of the structural and civil evaluations.

2. Limitations

This report has been prepared for the sole and exclusive use of Eric Miller Architects (EMA) and shall not be relied upon by or transferred to any other party, or used for any other purpose, without the express written authorization of **KPFF Consulting Engineers (KPFF)**.

In preparation of our evaluation and report, limited original structural drawings were made available to KPFF for review and use. A site investigation was performed to verify that visible existing conditions generally matched the limited available drawings; however, no finishes were removed and materials testing was limited to three concrete compression tests of one wall. The conclusions in this report were based on a review of the existing drawings, our experience with similar structures and sites. Evaluation of potential soils-related hazards have not been evaluated by KPFF.

3. Building & Site Descriptions

The Hofsas House is a hotel on the west side of San Carlos Street near 4th Avenue in Carmel, California, on a site that has approximately 20 feet of grade change. Originally a collection of smaller buildings built prior to 1957, the site is a collection of interconnecting buildings built of wood, concrete masonry (CMU) and concrete. Figure 1 is an aerial view of the site with the different colors representing construction timeframes, as best as they could be determined using the available drawings. Buildings highlighted in green represent the single-story concrete and CMU structures with timber roofs built prior to 1957. Highlighted in yellow, the wood-framed construction from 1957 enveloped some of the original structures and contains the lobby and 25 guest rooms. Orange highlights in Figure 1 represent the 3-story wood-framed L-shaped building and single-story poolside building of an unknown vintage because drawings were not available for review. Online research hints that the structures were built circa 1957, and the visible framing of the 2-story building is similar though not identical to the yellow highlighted structure.

Including the three structures, the site accessible to Hofsas House guests measures approximately 0.8-acres. The lobby and guest check-in is located along San Carlos Street. A pedestrian loading zone is located along San Carlos Street. Guest parking is available at the rear of the site, accessible through one-way drive-throughs under the building. Guest parking elevations vary, but are approximately 1- to 2-stories lower than the entrance along San Carlos Street. Guest amenities including a heated swimming pool and dry saunas are located adjacent to the lower parking lot.

Figure 1- Aerial View

Figure 2- West Elevation

Our office visited the site for visual assessment in July of 2022 and again in May of 2024. A partial set of drawings for the yellow highlighted building was available for review. Prepared by Robert R. Jones, AIA and Carter and Slattery Structural Engineers, the available drawings detail a 4-story, wood framed structure with lightly reinforced concrete grade beams. The gabled roofs consist of 5/8" thick plywood sheathing over 2x6 joists spaced at 16" on center in the southmost roof and 32" on center elsewhere. At the floor levels, 1" thick diagonal sheathing spans between 2x12's spaced at 16" on center. At the units with the exposed exterior walkways, every other joist spans past the westmost perimeter wall to support 2x6 flat decking which carries the corridor loads.

When subjected to lateral loads, the plywood roof sheathing distributes inertial forces to diagonal sheathed shear walls. Similarly, the 1x diagonal floor sheathing distributes inertial forces to the same diagonal sheathed shear walls. The sheathed walls carry the inertial loads to the concrete strip footings.

4. Results of Structural Evaluation

Our limited field observations, the concrete core compressive tests, and our review of the partial drawings set highlighted a number of structural issues.

4.1 Inadequate Lateral System: The floor diaphragm and shear walls are sheathed with diagonal sheathing rather than plywood, and the current walls and floors very likely do not have the minimum capacity required by the current building code. The walls also likely do not have the adequate hardware (holdowns or tiedowns) required to resist overturning when subjected to large seismic loads. After a thorough quantitative seismic analysis, retrofit will likely involve removing floor and wall finishes and installing the requisite hardware and plywood sheathing.

4.2 Floors at different elevations and no seismic separations between Buildings The 1957 framing included no consideration for seismic separation of the various uniquely-framed segments of the building. For example, if built today, there would be a seismic separation between the portion of the building containing the lobby and the portion that contains guest rooms directly north of the lobby. The floors in these areas do not align, as seen in Figure 2. In the event of a major earthquake, it is likely that the building will be damaged at the locations where floors do not align.

4.3 Interface with pre-1957 building: The 1957 structure was built over one of the original structures located on the site. The drawing sheet with the east wall section was not available for review; however, Figure 3 below shows the interface between the original structure with the flared foundation and the 1957 structure. The 1957 structure was excavated below the original foundation, so underpinning was shown in the section. No positive attachment between the structures is shown, and without is the 1957 structure is likely to shift on the original structure in the event of a major earthquake. Such a shift will cause substantial damage and may be irreparable.

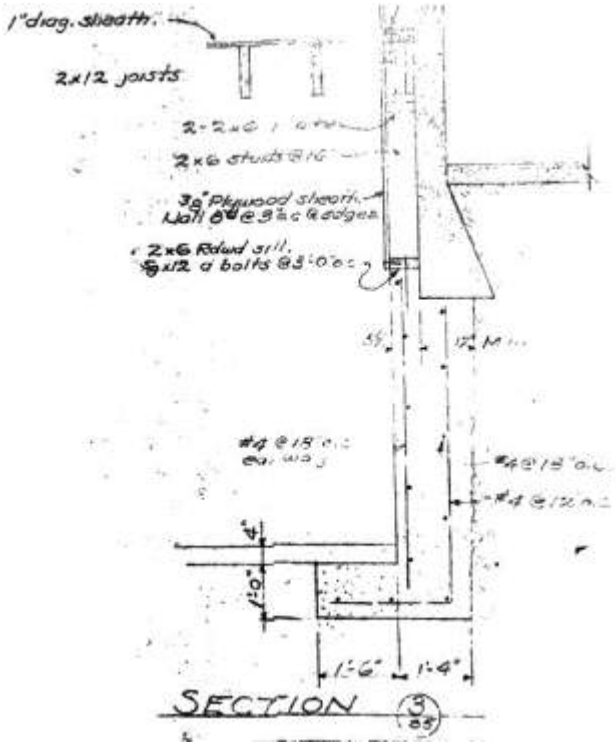


Figure 3- Interface Between 1957 Structure and Pre-1957 Structure

4.4 Condition of the pre 1957 retaining wall: The pre-1957 structure that was incorporated into the 1957 structure has an 8' tall concrete retaining wall within 8' of San Carlos Street. The wall is in poor condition and has a large void vein running through it (See Figure 4). Beach sand and Carmel stone appear to have been used as aggregate in the wall concrete. Because of this, and because water

appears to have been leaking through the wall for some time, the average concrete core compressive strength was tested to be 1290 psi, with a low value of 790 psi tested where shown in Figure 4. Two other samples were taken away from the void vein, and the compressive strengths were 1050 psi and 2020 psi, as seen in the materials testing report in Appendix A. The tested concrete is quite weak, and the weakened wall is critical for the support of both the 1957 structure above and the adjacent San Carlos Street. Replacement is recommended, though it may prove cost prohibitive as it will require shoring both the roadway and the entire building, plus reattachment. The work will also likely trigger a full seismic retrofit. Due to the potential impact on the adjacent street, further detailed study is warranted, including a geotechnical investigation. Traffic, including truck traffic, is potentially surcharging a weak and decaying retaining wall in its current configuration.

Figure 4- Void Vein in East Wall of Pre-1957 Structure

4.5 Attachment to Pre-1957 Structure At East Wall: Although the structural drawing showing the attachment between the 1957 structure and the east wall of the original structure was not available, the connection appears tenuous in the field and appears to have been repaired at one location in the past. The repair also does not appear to be rugged. Failure of this connection will lead to substantial damage.

Figure 5- Resupport of 1957 Structure at East Wall of Original Structure

4.6 Efflorescence and Weak Concrete in South Wall of Pre-1957 Structure: As shown in Figures 6 and 7, there is visible efflorescence on the surface of the south wall of the pre-1957 structure, indicating that water has been migrating through the wall. Additionally, the surface concrete at the efflorescence crumbled easily by hand. The concrete condition is likely similar to the tested concrete of the east wall.

Figure 6- Efflorescence and Weak Concrete in South Wall of Pre-1957 Structure

Figure 7- Additional Efflorescence and Weak Concrete in South Wall of Pre-1957 Structure

4.7 Exposed Deck Joists: Figure 8 shows a typical condition of cantilevered 2x12 joists on the west and south sides of the hotel buildings. The 2x12 joists at 32" on center specified on the historic structural drawings do not have the capacity to carry 100 psf corridor loading required by the building code. Although they don't extend to the ground, the intermittent posts will help share load between floors; however, corridor framing is typically designed to carry load at the level it is applied. In addition, the cantilevered joists are prone to dry rot, and we noted locations in the exposed walkway framing where the original members have been replaced with pressure treated lumber, presumably because the original elements rotted. We also noted signs of weathering on some exposed timber elements, plus some rot in in the exposed framing in the northmost building.. All rotted elements should be removed and replace Additionally, the joists are a conduit for moisture to enter the building if not flashed properly. No finishes were removed to examine the supporting west wall framing, but there may be rot in some locations due to water intrusion. The cantilevered joist condition has been singled out as the cause of the infamous balcony collapse in Berkeley.

Figure 8- Typical Exposed Framing at Walkway

Figure 9- Example of Weathering in Exposed Framing

Figure 10- Dry Rot in Exposed Framing at Northmost Building

Figure 11- Dry Rot in Exposed Landing Framing at Northmost Building

4.8 Corroded Base Plate and Anchors: At the Southwest corner of the northmost building, there is a column to support the two stories of hotel space above. Although painted, the paint is blistered on the base plate and the anchor bolts are corroded. The finish should be removed for further investigation, and the base plate and anchor bolts may require replacing. Figure 12 shows the condition.

Figure 12- Corroded Base Plate and Anchors

4.9 Fractured CMU at Cantilevered Beam: There is a 6x12 beam than cantilevers off the CMU wall at the north end of the building highlighted yellow in Figure 1. This beam supports the elevated walkway framing and the stair landings. The CMU support wall has cracked underneath beam and should be repaired.

Figure 13- Fractured CMU Support Wall at Cantilevered 6x12

5. Results of Civil Engineering Evaluation

The following sections note a variety of field observations made upon our May 2024 site visit. The comments listed below are primarily focused on site accessibility, but also cover other site features including site structures, drainage, and utilities. The key map below, Figure 14, provides the general location of the following listed items.

Figure 14 – Civil Site Observations Key Map

5.1 Pedestrian Loading Zone: An approximate 30-foot length of San Carlos Street is marked white for "Hotel Loading Zone Only". Immediately adjacent to the loading zone is a shallow curb, painted white, limited landscaping/bushes, and a brick/wood decorative wall. No direct access is available to the adjacent pedestrian walkway. While the location is generally appropriate, the loading zone is missing several features to provide pedestrian accessibility. A 5-foot wide, striped and hatched area is required adjacent to the loading zone. A direct connection to the walkway is also required, with a detectable warning surface located between where the loading zone interfaces with the walkway. While removing the existing curb, landscaping and wall appear feasible, it does not appear that sufficient space is available to provide the required accessible elements. In order to provide an accessible pedestrian loading zone, the area may need to be relocated and/or other significant improvements made to create a new location to serve the function.

Figure 15 – Existing Pedestrian Loading Zone

5.2 Lobby Entrance: The lobby entrance is located near the pedestrian loading zone, adjacent to the south driveway. The entrance is located near, and directly visible from, the public right-of-way along San Carlos Street. To enter the lobby, a pedestrian is required to take two steps up to the level of the lobby. No handrail is provided along the steps in the direct from the right-of-way. At the top of the steps, an in-swinging door provides access to the lobby. The threshold is in excess of ½", and an adequately sized landing space is not provided at the door. Access from the right-of-way to entry also requires a pedestrian to traverse the primary driveway entrance to the on-site parking; no separate, protected walkway is provided.

Figure 16 – Lobby Entrance

5.3 No Accessible Parking Stalls: Heading west from the lobby entrance brings users down a steep driveway into the on-site parking area. Approximately 30 parking spaces are provided on-site, but there are no accessible parking stalls identified. For the quantity of on-site parking provided, two accessible parking stalls are required: 1 van accessible stall and 1 standard accessible stall. The stalls would require appropriate signage and striping, grading improvements to provide a level area, and adjacent accessible improvements to connect the parking with the site (See Items 5.4 and 5.5 below).

5.4 Pool Accessibility: A heated swimming pool amenity is located adjacent to the lowest parking area. An accessible lift is provided in order to enter the pool itself. To enter the pool area, a gate is located at the southeast corner. The gate latch is located at the top of fence and the area immediately outside of the gate lacks the required landing space. A gate is also located at the northwest corner of the pool area; the gate is located on a run of stairs, without adequate clearances around the gate or at either the top or bottom of the stair run. In addition, the deck area around the pool has areas which exceed 2%. To provide accessibility to the pool area, the southeast gate would need to be replaced, the landing area would need to be expanded, detectable warning would need to be added to separate the pedestrian zone from the parking lot, and the pool deck would need to be re-graded to provide level access.

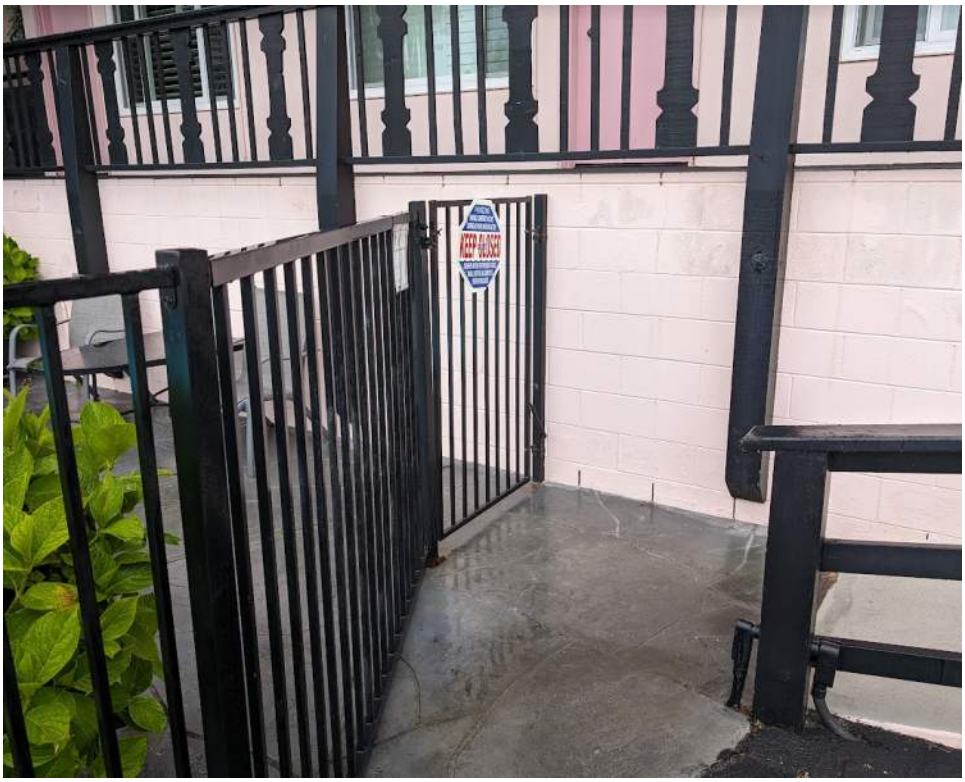


Figure 17 – Southeast Pool Entrance

Figure 18 – Northwest Pool Entrance

5.5 Non-Accessible Pedestrian Ramps: Pedestrian ramps are located in the lowest parking area, connecting parking and the pool area with the lowest level of rooms in the main building. The ramps lack detectable warning at the interface with the parking lot. The ramps lack appropriate handrails. The ramp slopes exceed 8.33%, and no intermediate landings are provided where the elevation change exceeds 30". All of these deficiencies would need to be corrected in order to provide accessibility. Given the total elevation change between the parking lot/pool and the building level, the ramp lengths would need to be extended. It is unclear if space is available for the extended length to be accommodated.

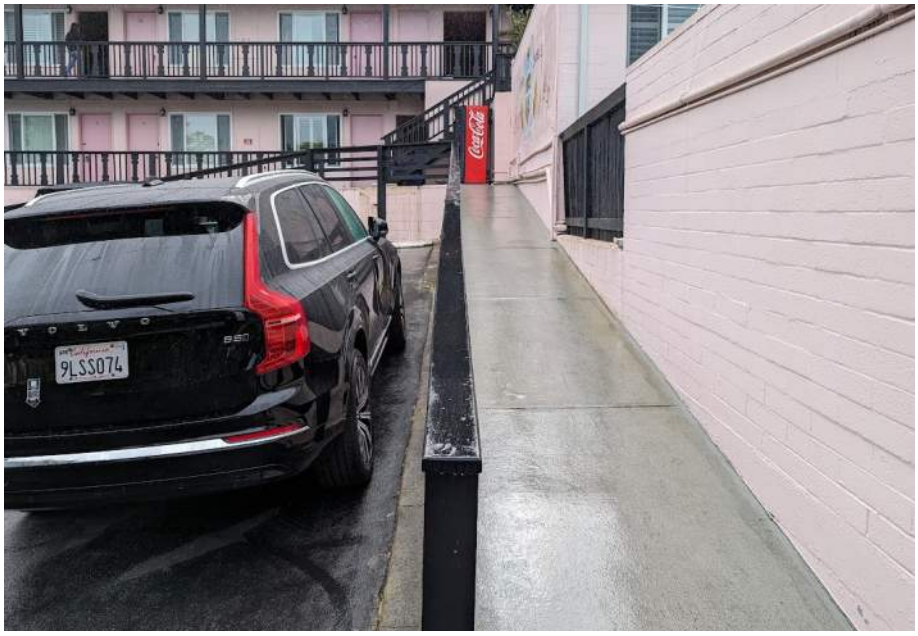


Figure 19 – Pedestrian Ramp

5.6 Site Stairs: Given the elevation change across the site, the multiple stories of guestrooms, and the lack of interior corridors, site stairs are provided throughout the site. With the exception of stairs constructed as a part of the 1957 building, numerous issues were identifiable across the approximately dozen stairs observed on-site. In general, all stairs lacked handrails with appropriate gripping areas; handrails were frequently only provided on one side of the sitars; handrails did not extend sufficiently beyond the length of the stair run. In addition, a stair located at the north end of the main building, extending down from San Carlos St, has a handrail obstructed by an emergency fire access ladder from a higher level.

Figure 20 – Stairs

Figure 21- Stairs

Figure 21 – Stairs

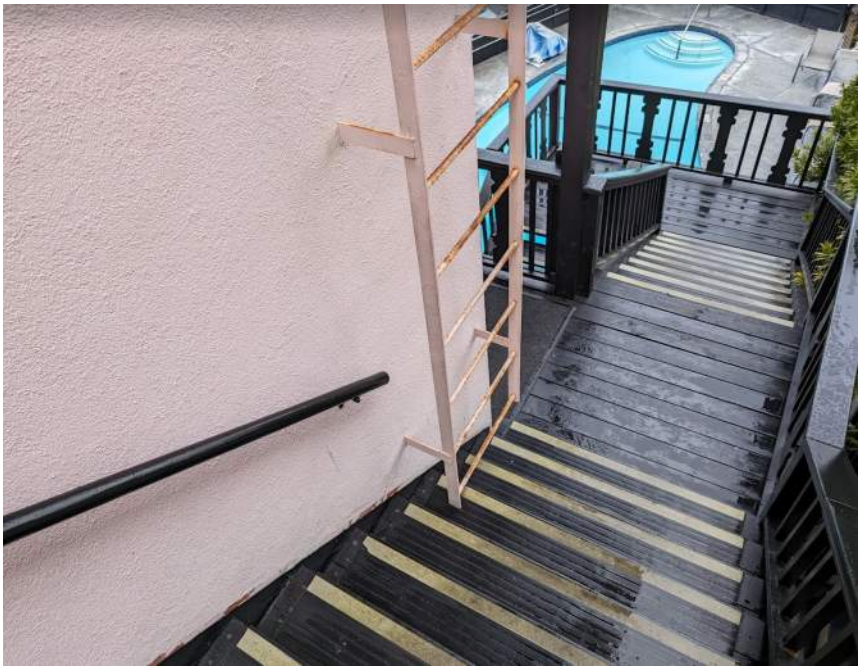


Figure 22 – Stairs

5.7 No Pedestrian Egress to Public Right-of-Way: Site users in the off-site parking lot and at the pool amenity have no egress path to the public right-of-way. In order to reach San Carlos St, a user would need to either walk up a steep driveway on either side of the site, or use various runs of stairs. An accessible path, separated from the driveway is needed from these lower site areas. The accessible path would need to be separated from the vehicular areas with a curbed walkway, likely with handrails. The walkway would likely require significant grading improvements and potential retaining walls; it may also severely impact vehicular access around the site.

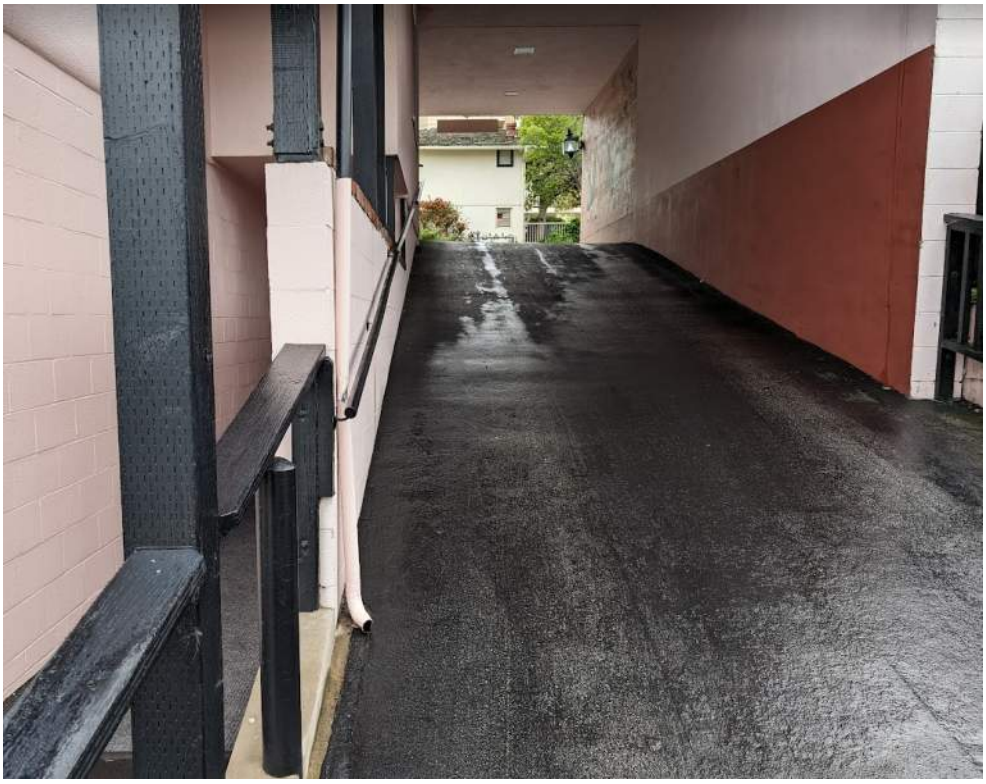


Figure 23 – Ramp at Primary Entrance Driveway

5.8 CMU Retaining Wall, Potential Movement: A CMU retaining is located at the southwest area of the site, supporting a parking lot for hotel users. The primary CMU retaining wall, located in the north-south orientation appears to be in good condition. The shorter CMU retaining wall, returning east-west and varying in height from approximately 4-feet high to flush appears to be out of plumb. The foundation of the wall is not observable, but it appears that the wall may be sliding and needs to be replaced/improved.

Figure 24 – CMU Retaining Wall

5.9 Wood Retaining Wall, Structural Failure: Wood retaining walls are located around the parking at the southwest corner of the site. The parking lot is located lower than the adjacent site improvements. The wood retaining walls generally support landscape areas, with some concrete improvements. The wall is constructed of 2x12 planks with 6x6 posts spaced at 8' on center. Where the wall is the highest, approximately 4-feet, the wall is beginning to fail with plans being bowed out and posts beginning to rotate. Wall replacement is likely needed.

Figure 25 – Wood Retaining Help

5.10 Sanitary Sewer Lateral: Relatively new sanitary sewer cleanout boxes were located throughout the parking lot at the rear of the site. Based on the cleanout box layout, it appears that sanitary sewer flows via gravity to Dolores Street. Given the appearance of the cleanout boxes and frequency of placement, we would expect that the sewer system may have been upgraded and is in relatively good condition. Further assessment could be done.

Figure 26 – Sanitary Sewer Cleanout

5.11 Domestic Water Service: Several water meters were identified along the frontage on San Carlos St, located inline with both the main building and the 1957 building. Backflow preventers were located on the domestic service lines. The backflow preventers appeared to be in good condition. No other observable notes on the water distribution.

Figure 27 – Water Backflow Preventer

5.12 Gas Service Location, Limited Access & Ventilation: A gas meter was located on-site, in between the main building and the 1957 building. The gas meter is at a level that is approximately 2-stories beneath San Carlos St. The gas meter is located under site stairs, with limited access to the gas meter set. In addition, there are operable doors and windows located above the gas meter set. This location would not currently be acceptable by gas utility agencies and may pose a potential fire hazard if a gas leak leads to trapped gas.

Figure 28 – Gas Meter Under Stairs

5.13 Disconnected Drainage System**:** As noted previously, the site experiences significant elevation change. The site is also generally paved. During our site visit, the site was wet but did not display any clear indication of drainage issues. With that said, the majority of roof downspouts are "disconnected" from the storm drain system – they are not directly piped but rather discharge onto pavement areas. Concentrated flow from downspouts are a hazard to pedestrians and cannot be done across pedestrian paths of travel. In the current site configuration, with limited pedestrian paths of travel, this is not a concern; however, it may be more of a concern requiring storm drain additions where pedestrian accessible improvements are added to correct previously noted issues.

Figure 29 – Downspout onto Driveway

Appendix A
Concrete Compression Tests

APPLIED MATERIALS & ENGINEERING, INC.
980 41st Street
Oakland, CA 94608
Tel: (510) 420-8190
FAX: (510) 420-8186
e-mail: info@appmateng.com

May 20, 2024

Project No.: 1240362C

Mr. Eric Miller
ERIC MILLER ARCHITECTS
211 Hoffman Avenue
Monterey, CA 93940

Email: Eric@ericmillerarchitects.com

Subject: Hofsas House Hotel – Cores Compressive Strength
San Carlos St. btw 3rd and 4th Street, Carmel, CA

Dear Mr. Miller:

As requested, Applied Materials & Engineering, Inc. (AME) has completed laboratory testing of the concrete strength for the subject property.

PROCEDURES & RESULTS

Three (3) cores were delivered to our laboratory; the cores were tested for compressive strength per ASTM C42 (dry).

Results of this testing are given in Table I. Based on results the average compressive strength of the concrete is 1290 psi.

Please call if any questions arise.

Sincerely,

APPLIED MATERIALS & ENGINEERING, INC.

Armen Tajirian, Ph.D., PE
Principal

TABLE I

CONCRETE CORE COMPRESSIVE STRENGTH TEST RESULTS

Hofsas House Hotel

San Carlos St. btw 3rd and 4th Street, Carmel, CA

AME Project No. 1240362C

Core ID	As Received Height (in.)	Diameter (in.)	Capped Height (in.)	Area (in.²)	Correction Factor	Ultimate Load (lbs)	Ultimate Compressive Strength (psi)
4	8.25	3.73	6.59	10.92	0.982	22,470	2020
5	8.89	3.73	7.93	10.92	1.000	11,440	1050
6	8.66	3.73	5.03	10.92	0.942	9,160	790
						Average	**1290**

Appendix B
Hazardous Materials Report

S
TECH
CONSULTING

Limited Asbestos & Lead-Based Paint Survey Report

Commercial Property

Site: Hofsas House, San Carlos 2NW of 4th, Carmel, California

S Tech Project: 23116-2

Prepared for: Hofsas Legacy LLC

July 27, 2023

S Tech Consulting was retained by Hofsas Legacy LLC to conduct a limited assessment for asbestos containing materials and lead-based paint at the the Hofsas House, on San Carlos, 2NW of 4th Avenue, in Carmel, California. A retaining wall, connected to the hotel requires structural inspection. To create observation panels, the existing wallboard and siding must be disturbed in six rooms on the first and second floors.

Prior to disturbing building materials, the EPA and Cal-OSHA require sampling to determine whether asbestos is present. When asbestos is identified, it must be handled and disposed of by trained and licensed personnel, to ensure an airborne asbestos hazard is not created. Lead paint is regulated by EPA and OSHA to prevent creating a lead exposure hazard for workers and especially children.

The site visit took place on July 25, 2023 by Sean Tillema, a DOSH Certified Asbestos Consultant (CAC 07-4257) and California Department of Public Heath Certified Lead Related Construction Inspector / Risk Assessor (LRC-2901).

Scope of Work & Property Description

The scope of work was to conduct a limited asbestos and lead-based paint survey in the locations where access panels will be cut to facilitate the structural inspection. The asbestos survey was in compliance with the Monterey Bay Air Resources District's (MBARD) requirements. Lead testing was for compliance for the Cal-OSHA Lead in Construction Standard.

The facility is a multi-building hotel constructed between the 1940s through 1960s. The subject building where access panels will be created was constructed in the 1950s.

The rooms selected for access panels are rooms and 1, 3, and 5 on the first floor and rooms 22, 24, and 26 on the second floor. The panels will all be cut in the guest room closets.

The exterior of the building is clad in stucco siding. Interior walls are drywall with a skim coat.

Hotel Room #1 (Similar To Other Rooms In Scope)

484-b washington street monterey, ca 93940 #401 / p 831 883 8415 / f 877 984 5495 / info@stechconsulting.com / stechconsulting.com

Asbestos Containing Materials

Asbestos-containing material (ACM) is defined by the United States Environmental Protection Agency (EPA) as material containing **more than one percent asbestos** as determined by Polarized Light Microscopy (PLM). In California, for contractor licensing and employee protection, the California Department of Occupational Safety and Health (Cal-OSHA) classifies any material as having greater than one-tenth of one percent (>0.1%) asbestos as Asbestos-Containing Construction Material (ACCM). Asbestos containing material are divided into friable and non-friable classifications. Friability refers to the likelihood of the material readily releasing airborne fibers when disturbed. Materials which are non-friable in-situ have the potential to become friable when deteriorated or when renovation or demolition occurs.

The following conclusions were arrived at from the field inspection and the analytical results:

- **The joint compound associated with the drywall system in the four-story hotel building contains less than (<) 1% Chrysotile asbestos. Joint compound cannot be separated from the non-asbestos drywall. The removal of the drywall must be handled as friable, Regulated Asbestos Containing Material (RACM).**

Analysis was performed by Patriot Environmental Laboratories, a NVLAP accredited laboratory, on a twenty-four hour laboratory turnaround time. Seventeen samples were collected and submitted to the laboratory. Once at the lab, the submitted samples were further separated into thirty-two individual materials for analysis. The table below is a summary of materials identified to contain asbestos. Following the summary table, is a listing of all materials collected from the site, with samples in red containing asbestos. The laboratory report is provided in appendix 'A' of this document. See the summary for additional information.

Asbestos Summary Table

Asbestos Material	Locations	Analytical Results	Classification	Approximate Quantity to be Removed
Drywall Joint Compound	4-Story Hotel Building Throughout	Drywall: NAD JC: Up To <1% Chrysotile	Friable, RACM	**To Be Determined By The Scope Of The Renovations**

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Asbestos Containing Materials - continued

Asbestos Bulk Sample Table			
Sample Number	**Material Sampled**	**Sample Location**	**Analytical Results NAD = No Asbestos Detected**
116-2 - 1	Drywall / Joint Compound	Guest Room #1 - Bathroom	Drywall: NAD JC: <1% Chrysotile
116-2 - 2	Drywall / Skim Coat	Guest Room #1 - Bathroom	NAD
116-2 - 3	Drywall / Joint Compound	Guest Room #3 - Bathroom	NAD
116-2 - 4	Drywall / Skim Coat	Guest Room #3 - Bathroom	NAD
116-2 - 5	Drywall / Joint Compound	Guest Room #5 - Bathroom	Drywall: NAD JC: <1% Chrysotile
116-2 - 6	Drywall / Skim Coat	Guest Room #5 - Bathroom	NAD
116-2 - 7	Drywall / Joint Compound	Guest Room #26 - Bathroom	Drywall: NAD JC: <1% Chrysotile
116-2 - 8	Drywall / Skim Coat	Guest Room #26 - Bathroom	NAD
116-2 - 9	Linoleum	Guest Room #25 - Bathroom, Top Layer	NAD
116-2 - 10	VFT - 9”x9” w/ Black Mastic	Guest Room #25 - Bathroom, Bottom Layer	NAD

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Asbestos Containing Materials - continued

Asbestos Bulk Sample Table			
Sample Number	**Material Sampled**	**Sample Location**	**Analytical Results NAD = No Asbestos Detected**
116-2 - 11	Linoleum	Guest Room #24 - Bathroom	NAD
116-2 - 12	Drywall / Joint Compound	Guest Room #24 - Bathroom	Drywall: NAD JC: <1% Chrysotile
116-2 - 13	Drywall / Skim Coat	Guest Room #24 - Bathroom	NAD
116-2 - 14	Drywall / Joint Compound	Guest Room #22 - Bathroom	Drywall: NAD JC: <1% Chrysotile
116-2 - 15	Drywall / Skim Coat	Guest Room #22 - Bathroom	NAD
116-2 - 16	Stucco	Four Story Building - Exterior	NAD
116-2 - 17	Stucco	Four Story Building - Exterior	NAD

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Lead-Based Paint & Glazings

Lead-Based Paint (LBP), as defined by EPA, is of concern both as a source of direct exposure through ingestion of paint chips, and as a contributor to lead interior dust and exterior soil. Lead was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments and drying agents from the early 1950's. In 1972, the Consumer Products Safety Commission limited lead content in new paint to 0.5% (5000 ppm) and, in 1978, to 0.06% (600 ppm). **Today, for purposes of lead-based paint inspection, for childhood lead poisoning prevention, EPA defines LBP as paint containing greater than 0.5% (5000 ppm) lead by weight or greater than 1.0 mg/cm² by surface area. This report applies the 1.0 mg/cm² reference standard, which applies to X-ray Fluorescence (XRF) testing.**

The State of California has enacted a number of regulations to minimize lead exposure in children and adults. Specifically, Title 17, California Code Of Regulations, Division 1, Chapter 8 Accreditation, Certification, and Work Practices For Lead-Based Paint and Lead Hazards and a number of California Civil and Health and Safety Codes, provide requirements for lead-safe housing and the prevention of lead hazards from developing in housing. A complete list of all State of California LBP regulations is available at the CDPH Childhood Lead-Poisoning Prevention Branch website. The California Department of Public Health (CDPH) is the agency responsible for enforcing compliance with existing state LBP regulations.

For occupational lead exposure in the construction and building maintenance industries, lead is regulated below the threshold set by the EPA for lead-based paint. Additionally, OSHA does not limit lead health and safety requirements to paint. Many other building materials and manufactured items are known to contain lead. Adult occupational tasks may result in exposure to lead even when working with low lead concentrations. Tasks such as abrasive blasting, flame torch usage, and mechanical grinding are especially prone to occupational lead exposure. When lead is present in any concentration, Cal-OSHA, under Title 8 CCR Section 1532.1, requires employers to evaluate the task performed and conduct an exposure assessment. Based on the results of the exposure assessment, engineering controls and personal protective equipment may be necessary to reduce occupational lead exposure. Additional information is available from this Cal-OSHA fact sheet: http://www.dir.ca.gov/dosh/dosh_publications/lead-fct-sheet-rev.pdf

Paint testing at this property was conducted by X-ray Fluorescence (XRF), which provides instant onsite analysis, penetrating all paint layers.

The following conclusions were arrived at from the testing:

- **Exterior and interior, EPA defined Lead-Based Paint (>1.0 mg/cm² by XRF) is NOT present in coatings anticipated to be impacted by the scope of the paint disturbance for the retaining wall inspection.**

- **For the purposes of compliance with the Cal-OSHA 8 CCR 1532.1 'Lead in Construction Standard', when disturbing any amount of lead, in any material, the employer must ensure their employees are not exposed to lead in excess of the Action Level (AL) or Permissible Exposure Limit (PEL). Contractors must have historical exposure data on file for the task performed or they must conduct an exposure assessment on representative workers. Engineering controls and personal protective equipment (PPE) must be utilized where exposure data dictates. Tasks that are likely to create high lead exposure are abrasive blasting, flame torching, and mechanical grinding.**

A table listing the results of all the components tested is provided in Appendix 'B'. See summary for additional information.

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Summary of Findings

Asbestos

When conducting renovation or demolition, A State of California C-22 Licensed Asbestos Abatement Contractor who is Division of Occupational Safety & Health (DOSH) registered, must be retained when disturbing materials containing greater than 0.1% asbestos (Asbestos Containing Construction Material). All work must be conducted in strict accordance with Cal-OSHA's asbestos standard, 8 CCR 1529 and the requirements of the Monterey Bay Air Resources District's (MBARD) Rule 424. Waste must be disposed of in the correct landfill for the classification of asbestos being removed.

The following recommendations apply specifically to this project:

- Regulated Asbestos Containing Material (RACM) exceeding 160 square feet will not be impacted by the scope of the current renovations. A notification to the Monterey Bay Air Resources District (MBARD) is not necessary for the cutting of the observation panels in the specific rooms chosen for this project. If the scope of the removal expands to exceed 160 square feet, then air district notification will be necessary.

- Contractors should be aware that concealed spaces may harbor additional suspect material. Asbestos insulated pipes and asbestos cement pipes may be concealed within ceilings and wall cavities. Should any additional suspect materials be identified during the course of the renovation work, stop work and contact us to assess and sample if necessary.

Lead

Lead-Based Paint was not identified in any of the coatings expected to be impacted by the scope of the renovations. No further action is required with regards to LBP.

The following recommendations apply specifically to this project:

- Contractors shall ensure compliance with Cal-OSHA's Lead in Construction Standard. All paints tested have a quantifiable lead content. Cal-OSHA has not set a lower 'safe' threshold for lead content in regards to occupational exposure for workers involved in the construction industry. Contractors who task employees with activities that could result in occupational exposure to lead must follow the requirements of the Lead in Construction Standard to ensure their employees are protected. Contractors should collect exposure data on their employees or have historical data from similar tasks or projects.

If you have any questions please feel free to call us at 831.883.8415

S Tech Consulting

Sean P. Tillema
Certified Asbestos Consultant (CAC) #07-4257
Certified Lead Inspector / Risk Assessor #LRC-2901

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Limitations

This report is not intended to identify all hazards or unsafe conditions or to imply that others do not exist. This survey was planned and implemented on the basis of a mutually agreed scope of work and S Tech's experience in performing this type of assessment.

Areas outside our scope or inaccessible areas are excluded from this report.

S Tech Consulting has performed this survey in a professional manner using the degree of skill and care exercised for similar projects under similar conditions, by reputable and competent environmental consultants. S Tech Consulting shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time that this survey was conducted.

S Tech Consulting further states that no warranties, expressed or implied, are made regarding the quality, fitness, or results to be achieved as a consequence of this report or impacted by information not properly disclosed to S Tech at the time of this report. It further states that no responsibility is assumed for the control or correction of conditions or practices existing at the premises of the client.

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Site Plan and Asbestos Sample Locations

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STECH CONSULTING	DATE PREPARED: 7/26/23	SOURCE: Google Earth	DRAWING TITLE: Aerial View of Subject Site
	REVISION:	REVISION DATE:	
	PROJECT NO: 23116-2	SCALE: NTS	FIGURE NO. A
	PROJECT NAME: **Hofsas Hotel** San Carlos, 2NW of 4th, Carmel, California		CLIENT: Hofsas Legacy LLC

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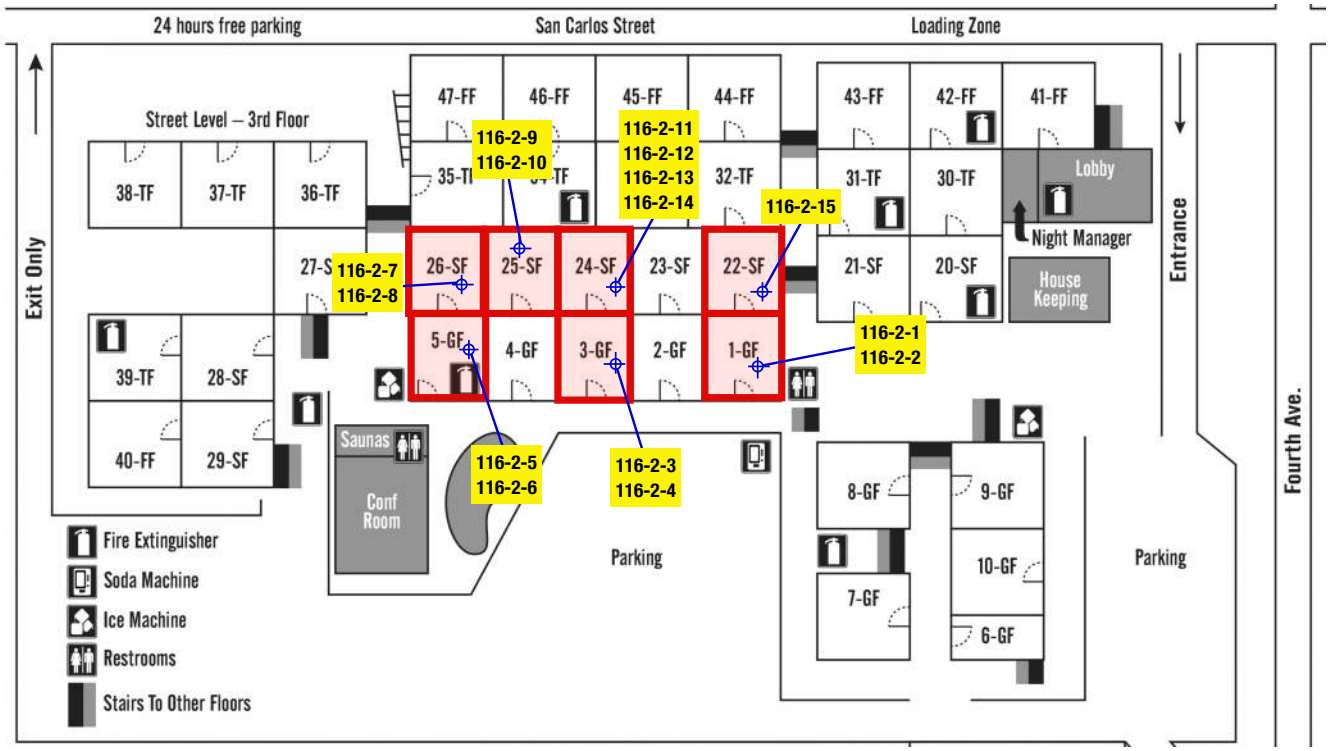

ASSESSMENT AREAS

▽ Indicates Exterior Sample Location

⌖ Indicates Interior Sample Location

*** Samples 16 & 17 Not Shown**

STECH CONSULTING	DATE PREPARED: 7/26/23	SOURCE: Hofsas Hotel	DRAWING TITLE: Asbestos Site Sample Location Plan
	REVISION:	REVISION DATE:	
	PROJECT NO: 23116-2	SCALE: NTS	
PROJECT NAME: **Hofsas Hotel** San Carlos, 2NW of 4th, Carmel, California		CLIENT: Hofsas Legacy LLC	FIGURE NO. 1

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Appendix A - Asbestos Analytical Data

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Certificate of Analysis
PLM Asbestos Identification

S Tech Consulting
484-B Washington Street #401
Monterey, CA 93940

Report Number: 983996
Project Number: 23116-2
Project Name: Hofsas Hotel
Project Location: San Carlos 2NW of 4th
Carmel, California

Date Collected: 7/25/2023
Date Received: 7/26/2023
Date Analyzed: 7/26/2023
Date Reported: 7/26/2023

Collected By: Sean Tillema
Claim Number:
PO Number:
Number of Samples: 32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
983996-001 116-2-1	4-Story Guest Room 1	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-001A 116-2-1	4-Story Guest Room 1	Joint Compound	White	100% Non-Fibrous Material
Chrysotile	<1 %			
Total Asbestos	**< 1%**			
983996-002 116-2-2	4-Story Guest Room 1	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-002A 116-2-2	4-Story Guest Room 1	Skim Coat	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-003 116-2-3	4-Story Guest Room 3	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			

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484-B Washington Street #401
Monterey, CA 93940

Report Number: 983996
Project Number: 23116-2
Project Name: Hofsas Hotel
Project Location: San Carlos 2NW of 4th
Carmel, California

Date Collected: 7/25/2023
Date Received: 7/26/2023
Date Analyzed: 7/26/2023
Date Reported: 7/26/2023

Collected By: Sean Tillema
Claim Number:
PO Number:
Number of Samples: 32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
983996-003A 116-2-3	4-Story Guest Room 3	Joint Compound	White	98% Non-Fibrous Material 2% Glass Fibers
Total Asbestos	**None Detected**			
983996-004 116-2-4	4-Story Guest Room 3	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-004A 116-2-4	4-Story Guest Room 3	Skim Coat	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-005 116-2-5	4-Story Guest Room 5	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-005A 116-2-5	4-Story Guest Room 5	Joint Compound	White	98% Non-Fibrous Material 2% Glass Fibers
Chrysotile	<1 %			
Total Asbestos	**< 1%**			

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Date Reported: 7/26/2023

Collected By: Sean Tillema
Claim Number:
PO Number:
Number of Samples: 32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
983996-006 116-2-6	4-Story Guest Room 5	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-006A 116-2-6	4-Story Guest Room 5	Skim Coat	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-007 116-2-7	4-Story Guest Room 26	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-007A 116-2-7	4-Story Guest Room 26	Joint Compound	White	100% Non-Fibrous Material
Chrysotile	<1 %			
Total Asbestos	**< 1%**			
983996-008 116-2-8	4-Story Guest Room 26	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-008A 116-2-8	4-Story Guest Room 26	Skim Coat	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			

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PLM Asbestos Identification

S Tech Consulting
484-B Washington Street #401
Monterey, CA 93940

Report Number: 983996
Project Number: 23116-2
Project Name: Hofsas Hotel
Project Location: San Carlos 2NW of 4th Carmel, California

Date Collected: 7/25/2023
Date Received: 7/26/2023
Date Analyzed: 7/26/2023
Date Reported: 7/26/2023

Collected By: Sean Tillema
Claim Number:
PO Number:
Number of Samples: 32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
983996-009 116-2-9	4-Story Guest Room 25	Linoleum	Off White	70% Non-Fibrous Material 25% Cellulose 5% Glass Fibers
Total Asbestos	**None Detected**			
983996-009M 116-2-9	4-Story Guest Room 25	Flooring Material	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-010 116-2-10	4-Story Guest Room 25	VFT - 9 Inches x 9 Inches	Tan Brown	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-010M 116-2-10	4-Story Guest Room 25	Mastic	Brown Black	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-011 116-2-11	4-Story Guest Room 24	Linoleum	Off White	70% Non-Fibrous Material 25% Cellulose 5% Glass Fibers
Total Asbestos	**None Detected**			
983996-011M 116-2-11	4-Story Guest Room 24	Flooring Material	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			

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Carmel, California

Date Collected: 7/25/2023
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Date Reported: 7/26/2023

Collected By: Sean Tillema
Claim Number:
PO Number:
Number of Samples: 32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
983996-012 116-2-12	4-Story Guest Room 24	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-012A 116-2-12	4-Story Guest Room 24	Joint Compound	White	100% Non-Fibrous Material
Chrysotile	<1 %			
Total Asbestos	**< 1%**			
983996-013 116-2-13	4-Story Guest Room 24	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-013A 116-2-13	4-Story Guest Room 24	Skim Coat	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-014 116-2-14	4-Story Guest Room 22	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			

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Project Name: Hofsas Hotel
Project Location: San Carlos 2NW of 4th
Carmel, California

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Date Reported: 7/26/2023

Collected By: Sean Tillema
Claim Number:
PO Number:
Number of Samples: 32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)
983996-014A 116-2-14	4-Story Guest Room 22	Joint Compound	White	100% Non-Fibrous Material
Chrysotile <1 %				
Total Asbestos **< 1%**				
983996-015 116-2-15	4-Story Guest Room 22	Drywall	White	93% Non-Fibrous Material 7% Cellulose
Total Asbestos	**None Detected**			
983996-015A 116-2-15	4-Story Guest Room 22	Skim Coat	White	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-016 116-2-16	4-Story Exterior	Stucco	Pink Grey	100% Non-Fibrous Material
Total Asbestos	**None Detected**			
983996-017 116-2-17	4-Story Exterior	Stucco	Pink Grey	100% Non-Fibrous Material
Total Asbestos	**None Detected**			

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S Tech Consulting
484-B Washington Street #401
Monterey, CA 93940

Report Number:	983996
Project Number:	23116-2
Project Name:	Hofsas Hotel
Project Location:	San Carlos 2NW of 4th Carmel, California

Date Collected:	7/25/2023	Collected By:	Sean Tillema
Date Received:	7/26/2023	Claim Number:	
Date Analyzed:	7/26/2023	PO Number:	
Date Reported:	7/26/2023	Number of Samples:	32

Lab/Client ID/Layer	Location	Material Description	Color	Composition (%)

Note: Additional materials observed and analyzed.

Denis Hau - Analyst

Esmeralda Jimenez - Approved By

Bulk sample(s) submitted was (were) analyzed in accordance with the procedure outlined in the US Federal Register 40 CFR 763, Subpart F, Appendix A; EPA-600/R-93/116 (Method for Determination of Asbestos in Building Materials), and EPA-600/M4-82-020 (US EPA Interim Method for the Determination of Asbestos in Bulk Insulation Samples). Samples were analyzed using Calibrated Visual Estimations (CVES); therefore, results may not be reliable for samples of low asbestos concentration levels. Samples of wall systems containing discrete and separable layers are analyzed separately and reported as composite unless specifically requested by the customer to report analytical results for individual layers. This report applies only to the items tested. Results are representative of the samples submitted and may not represent the entire material from which the samples were collected. "None Detected" means that no asbestos was observed in the sample. "<1%" (less than one percent) or Trace means that asbestos was observed in the sample but the concentration is below the quantifiable level of 1%. This report was issued by a NIST/NVLAP (Lab Code 201022-0) and CA Water Board ELAP (Cert. No. 2900) accredited laboratory and may not be reproduced, except in full without the expressed written consent of Patriot Environmental Laboratory Services, Inc. This report may not be used to claim product certification, approval or endorsement by NIST, NVLAP, CA-ELAP or any government agency.

ASB_Rep_2.23

983996

Laboratory Chain of Custody

Project Information		
S TECH CONSULTING	**Project #**	23116-2
	Date	Tuesday, July 25, 2023
	Client	Hofsas Legacy LLC
	Site	Hofsas Hotel, San Carlos 2NW of 4th,, Carmel, California
	Tech	Sean Tillema
	Analysis	Asbestos PLM
	Turnaround	24 Hour
	Released by	**7-25-23, 15:30**
	Received by	Sam Rocco 7/26/23 10 AM
	Note to Lab	
	Reports to:	Sean@stechconsulting.com, David@stechconsulting.com, consultingstech@gmail.com
484-B Washington Street, #401, Monterey, California 93940 **T 831.883.8415.**		

Asbestos Bulk Sample Log

Sample Prefix: 116-2										
Sample #	**Material (Pop Up Menu)**	**Additional Description**	**Color**	**Material (Manual Entry)**	**Building**	**Area**	**Location**	**#**	**Location Note**	**Note**
1	Drywall / Joint Compound				4-Story		Guest Room	#1		
2	Drywall / Skim Coat				4-Story		Guest Room	#1		
3	Drywall / Joint Compound				4-Story		Guest Room	#3		
4	Drywall / Skim Coat				4-Story		Guest Room	#3		
5	Drywall / Joint Compound				4-Story		Guest Room	#5		
6	Drywall / Skim Coat				4-Story		Guest Room	#5		

983996

Sample Prefix: 116-2										
Sample #	Material (Pop Up Menu)	Additional Description	Color	Material (Manual Entry)	Building	Area	Location	#	Location Note	Note
7	Drywall / Joint Compound				4-Story		Guest Room	#26		
8	Drywall / Skim Coat				4-Story		Guest Room	#26		
9	Linoleum				4-Story		Guest Room	#25		
10	VFT - 9"x9" w/ Black Mastic				4-Story		Guest Room	#25		
11	Linoleum				4-Story		Guest Room	#24		
12	Drywall / Joint Compound				4-Story		Guest Room	#24		
13	Drywall / Skim Coat				4-Story		Guest Room	#24		
14	Drywall / Joint Compound				4-Story		Guest Room	#22		
15	Drywall / Skim Coat				4-Story		Guest Room	#22		
16	Stucco				4-Story		Exterior			
17	Stucco				4-Story		Exterior			

Appendix B - Individual Lead XRF Data Table

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Project Information		
S TECH CONSULTING	**Project #**	23116-2
	Date	Tuesday, July 25, 2023
	Client	Hofsas Legacy LLC
	Site	Hofsas Hotel, San Carlos 2NW of 4th,, Carmel, California
	Tech	Sean Tillema - CDPH #2901
	Analysis	X-ray Fluorescence (XRF)

484-B Washington Street, #401, Monterey, California 93940 **T 831.883.8415.**

XRF Calibration

Assay	Assay Description	Purpose	Standard	Pass	Fail	Note
C1	Cal-Check	System Start-Up	Stainless Steel 316	☑	☐	Device Unlocked
C2	NIST Calibration #1	Lead-Based Paint XRF Calibration	NIST SRM 2573	☑	☐	Lead Calibration Check Passed
C3	NIST Calibration #2					
C4	NIST Calibration #3					

XRF Data Log

Assay	Area	Location	Component	Substrate	Pb (mg/cm2) <0.01 (BDL)	Pb (mg/cm2)	Pb (mg/cm2) >1.0 LBP	Note
1	4-Story Building, 1st Floor	Guest Room #1	Wall	Drywall	☐	0.38	☐	
2	4-Story Building, 1st Floor	Guest Room #3	Wall	Drywall	☐	0.65	☐	
3	4-Story Building, 1st Floor	Guest Room #5	Wall	Drywall	☐	0.53	☐	
4	4-Story Building, 2nd Floor	Guest Room #26	Wall	Drywall	☐	0.31	☐	
5	4-Story Building, 2nd Floor	Guest Room #24	Wall	Drywall	☐	0.09	☐	
6	4-Story Building, 2nd Floor	Guest Room #22	Wall	Drywall	☐	0.12	☐	
7	4-Story Building	Exterior	Siding	Stucco	☐	0.19	☐	

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