August 2020 | Initial Study EIR Scoping Document

MALIBU MIDDLE AND HIGH SCHOOL CAMPUS SPECIFIC PLAN AND LOCAL COASTAL PLAN AMENDMENT PROJECT

Santa Monica–Malibu Unified School District

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PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
amsl	above mean sea level
AQMD	air quality management district
AQMP	air quality management plan
BMP	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
cy	cubic yards
dB	decibel
dBA	A-weighted decibel
EIR	environmental impact report
EOP	emergency operations plan
EPA	United States Environmental Protection Agency
ESHA	environmentally sensitive habitat area
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
GHG	greenhouse gases
JCES	Juan Cabrillo Elementary School
LACoFD	Los Angeles County Fire Department
LCP	local coastal plan
LOS	level of service
LRA	local responsibility area
MMHS	Malibu Middle and High School

Abbreviations and Acronyms

NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OPR	[Governor's] Office of Planning and Research
PCH	Pacific Coast Highway
PM	particulate matter
RTP/SCS	regional transportation plan/sustainable communities strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SEMS	Standardized Emergency Management System
SMMUSD	Santa Monica–Malibu Unified School District
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SRA	state responsibility area
VMT	vehicle miles traveled
WQMP	water quality management plan

1. Introduction

Santa Monica–Malibu Unified School District (SMMUSD or District) intends to redevelop the former Juan Cabrillo Elementary School (JCES) and Malibu Middle and High School (MMHS) sites to: create a middle- and high-school campus that provides separate education spaces for the middle- and high-school students, improve vehicle and pedestrian circulation, and secure campus access while respecting the natural environment of West Malibu. The Proposed Project would reorganize the campus into three defined areas: Middle School Core, High School Core, and shared amenities. The Proposed Project would result in the demolition of all 18 existing buildings on the combined campuses; with only the existing athletic fields, and the nearly or recently completed buildings (Buildings A/B and E) on the MMHS campus would remain. The Proposed Project would not result in an increase in student enrollment or capacity. The Proposed Project would not impact the Malibu Equestrian Park located on District property adjacent to the campus.

SMMUSD will serve as the lead agency for the Proposed Project in accordance with the California Environmental Quality Act (CEQA) Guidelines section 15051(c). This Initial Study is a preliminary evaluation of the potential environmental consequences associated with the Proposed Project. As part of the District's approval process, the Proposed Project is required to undergo an environmental review pursuant to CEQA. The lead agency uses the initial study analysis to determine whether an environmental impact report (EIR) or a negative declaration is required and to solicit public comments on the scoping of the EIR. If an initial study concludes that the project may have a significant effect on the environment, an EIR must be prepared. Otherwise, a negative declaration or mitigated negative declaration is prepared.

1.1 PROJECT LOCATION

The Project Site includes the entirety of the SMMUSD property that consists of the existing Malibu Equestrian Park in the eastern portion of the property, the existing MMHS campus in the center of the property, and the former JCES campus in the western portion of the property. Malibu Middle and High School is located at 30215 Morning View Drive (Assessor's Parcel Map Numbers 4469-017-900, 4469-018-900, 4469-018-901, 4469-018-902, 4469-018-903, 4459-018-904, 4469-019-900, 4469-019-901, 4469-019-902 (9 parcels)), in the City of Malibu, Los Angeles County, California (Figure 1, *Regional Location*). The Malibu Middle and High School Campus Specific Plan (Proposed Project) would be developed within the existing MMHS campus and the former JCES campus. The Proposed Project would not impact the Malibu Equestrian Park. The MMHS campus is set amid rolling hills, and its buildings and athletic fields are terraced into the hillside setting. The MMHS campus is approximately 0.25 miles northeast of both the Pacific Coast Highway (PCH) and Zuma Beach, and bounded by Merritt Drive to the east, Via Cabrillo Street to the west, and Morning View Drive to the south. Single-family homes border the Project Site to the north (Figure 2, *Local Vicinity*, and Figure 3, *Aerial Photograph*).

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

The Project Site is in the Zuma Beach area in the Malibu Park portion of the City of Malibu. The 40-acre Project Site comprises the existing Malibu Equestrian Park, the existing MMHS campus, and the former JCES campus. The combined former JCES and MMHS campus contain a total of 228,558 square feet of developed structures as well as student areas, athletic fields, and parking areas.

1.2.1.1 FORMER JCES CAMPUS

The former JCES campus covers approximately six acres and is on the western end of the Project Site to the north of Morning View Drive, west of the MMHS campus. JCES formerly served elementary school grades K-5. As part of SMMUSD's wider Malibu Schools Alignment Project, the JCES student population combined with the Point Dume Marine Science School student population and moved to the Point Dume Marine Science School campus, renamed Malibu Elementary School, at the beginning of the 2019-20 school year. The former JCES campus includes 28 classrooms (including 9 portable classrooms), a library; administrative offices, multipurpose room; grass field, hardcourt area, and parking for 49 vehicles. Currently, middle school students occupy the portable classrooms, and high school students occupy Building F. No other JCES rooms are currently being used. Figure 4**,** *Existing MMHS Campus Buildings and Facilities*, shows the former JCES campus buildings, and Table 1, *Former JCES Campus Existing Building and Facilities*, provides each buildings' use and square footage:

Table 1 Former JCES Campus Existing Building and Facilities

Name	Primary Function	Square Footage
Building A: Administration Building	Main Administration offices.	2,280
Building B: Kindergarten Classroom Building	Kindergarten Classrooms	5,941
Building C: Classroom Building	Classrooms	4,554
Building D: Classroom Building	Classrooms (Art and Music)	4,535
Building E: Library	Library	2,694
Building F: Classroom Building	Classrooms	7,952
Building G: Multipurpose Room Building	Multipurpose Room and Food Service	4,758
Portables: Portables P1 to P5	Classrooms and Restrooms	5,280 (5 x 960sf, 1 x 480sf)
Portables: P6 to P7	Malibu Boys and Girls Club	1,920 (2 x 960sf)
Portables: Cottage A and B	Storage	N/A
Buildings H and I	Special Ed Classrooms	1,920 (2 x 960sf)
Total Square Footage		**41,834**

Source: SMMUSD 2020.

1.2.1.2 MMHS CAMPUS

The MMHS campus covers approximately 35 acres of the overall District property and operates as a sixth- through twelfth-grade public school with a 2018-19 enrollment of 939 students and 134 staff. Presently, the MMHS campus has 60 classrooms (including 12 portable classrooms); a library, auditorium, and administrative

offices; an athletic field, 2 gymnasiums, a pool, 9 basketball courts, and 4 tennis courts; and parking for 282 vehicles in three parking lots. Figure 4 shows the MMHS campus buildings, and Table 2, *MMHS Campus Existing Building and Facilities*, shows each building's use and square footage:

Table 2 MMHS Campus Existing Building and Facilities

Name	Primary Function	Square footage
Buildings A/B: Administration/Library/Classroom Building[1]	Administration Offices, Library, Classrooms, Science Classrooms	35,315
Building E: Classroom Building[2]	Classrooms	13,515
Building D: Classroom/Science Lab Building[3]	Classrooms, Science Labs, Staff Lounge	26,952
Building F (300 Building): Music/Band/Choral Building	Music and Lecture	6,720
Building G: Art, "Woodshop" Building[4]	Art (Ceramics), Makerspace, Special Ed (Life Skills)	9,972
Building H (600 Building): Cafetorium	Food Service, Kitchen, Auditorium (350 seat capacity)	14,478
Building I (400 Building): Graphic Arts	Photo and Art Classrooms	4,561
Building J (Building 700): Gymnasium	Gymnasium and Locker Rooms	20,758
Building J1: 'New' Gymnasium	Gymnasium and Team Locker Rooms	18,835
Building K: Classroom Building	Classrooms and Science Labs	12,698
Pool	Swimming, Water Polo	Pool: 60'x75' Pool Equipment Building: 900
Field House	Equipment Storage	930
Portables (Interim Classrooms and Administration)	Interim Classrooms and Administration	12,960 (1 @1,920sf, 8 @960sf, 1 @480sf, 3 @960sf)
Boys & Girls Club	Classrooms and Administration for before- and after-school care	9,120 (3@2,880, 1@480)
Bus Depot	Bus Storage	N/A
Maintenance and Operation Warehouse	Equipment Storage	930
Total Square Footage		**188,644**

Source: SMMUSD 2019.
1: Buildings A/B are currently under construction. These buildings would remain, with no work identified for the Proposed Project. Construction of Buildings A/B was evaluated and cleared as part of a previous MMHS EIR (SCH#2008091059).
2. Building E was recently constructed. This building would remain, with no work identified in the Proposed Project. Construction of Building E was evaluated and cleared as part of a previous MMHS EIR (SCH#2008091059)
3. Building D is included in this EIR for informational purposes. Demolition of Building D was evaluated for environmental impacts, cleared, and approved by the District in October 2019.
4. Building G is included in this EIR for informational purposes. Demolition of Building G was evaluated for environmental impacts, cleared, and approved by the District in June 2020.

1.2.1.3 SITE ACCESS, CIRCULATION, AND PARKING

The Project Site can be accessed from Morning View Drive, approximately 0.3 miles northeast of the intersection of Morning View Drive and PCH and 0.9 miles southeast of the intersection of Guernsey Avenue and PCH. Morning View Drive is a narrow, two-lane, local roadway with an open drainage system that provides direct access to single-family homes in the area as well as to the existing MMHS and former JCES campuses and the Malibu Equestrian Park. Regional access to the Project Site is provided via PCH.

There are currently two main points of vehicular entry into the MMHS and former JCES campuses. The first entry is along the eastern edge of the campus from Morning View Drive. The currently under-construction

Lower Parking Lot along Morning View Drive will provide 61 spaces as well as direct access to the MMHS campus; it will be primarily used by middle school staff and visitors. The 150-Space Parking Lot is accessed by the shared driveway with the Lower Lot from Morning View Drive and is next to the athletic field. The 150-Space Parking Lot has 145 standard and 5 ADA parking spaces; it is primarily used by high school staff and visitors and during nighttime athletic events.

The second point of entry is at the access road between the former JCES campus and the MMHS campus. This entry is a service access point and provides access to the Bus Depot, Maintenance and Operations Warehouse, and Parking Lot A. Parking Lot A has approximately 132 parking spaces (128 standard and 4 ADA) and is primarily used by high school students and Boys & Girls Club staff. Parking Lot A also provides access to on-site athletic facilities. The JCES Parking Lot has 37 spaces and is primarily used by high school staff and students. There is also a small service lot used for deliveries to the south of Building K. with seven parking spots Table 3, *Existing Project Site Parking*, shows the parking lot total per lot. Figure 4 shows the locations of the existing parking lots.

Table 3 Existing Project Site Parking

Name	Spaces
Lower Parking Lot	61
150-Space Parking Lot	150
Parking Lot A	119
JCES Parking Lot	37
Service Lot	7
Total	**374**

Source: SMMUSD 2018.

Student drop-off/pick-up for the Middle School currently occurs in the 150-Space Parking Lot, while drop-off/pick-up for the High School Students occurs in the JCES Parking Lot. As part of the current A/B Building project, a new 400-foot-long drop-off and pick-up lane would be provided along Morning View in front of the new A/B Building, with a dedicated 20-foot-long accessible drop zone. Sidewalks are provided on both sides of Morning View Drive from PCH north to the western end of the former JCES campus. There are currently three crosswalks along Morning View Drive that provide access to the former JCES and MMHS campuses from the south side of the street. A crossing guard mans the crosswalk in front of former JCES during the AM drop-off and PM pick-up peak periods. No parking is allowed along Morning View Drive.

1.2.1.4 SITE TOPOGRAPHY

The Project Site is situated on the southern flanks of the western portion of the Santa Monica Mountains. Maximum topographic relief on-site is approximately 94 feet, with elevations ranging from 86 to 180 feet above mean sea level. The campus consists of several near-level pad areas with generally ascending slopes to the north and descending slopes to the PCH to the south. On the MMHS campus, the street-level pad contains the currently under-construction MMHS administration, library, and classroom buildings (Buildings A/B); the under-construction Lower Parking Lot; and an outdoor courtyard, cafeteria, and auditorium. On the former JCES campus, the pad contains the administration building, the kindergarten classroom, the special education classrooms, and the JCES Parking Lot. The next pad contains the newer and old gymnasiums, outdoor

basketball courts and swimming pool, the Boys & Girls Club of Malibu facility, and the Bus Depot and Parking Lot A on the MMHS campus, as well as the multipurpose room, the library, and three educational buildings on the former JCES campus. The third pad contains the football field and track and the 150-Space Parking Lot. The fourth and highest pad contains the tennis courts and baseball diamonds. Each terrace is accessible via stairs and handicap accessible ramps. From street level, views of the development on the elevated terraces are limited.

There is very little natural vegetation on-site, consisting primarily of grasses, ivy, brush, shrubs, and scattered trees. The City of Malibu's Local Coastal Program (LCP) Environmentally Sensitive Habitat Area (ESHA) Map shows a stream approximately 400 feet northwest of the campus. The stream consists of an underground pipe that flows under the school property that daylights into a natural streambed to the south of the school property. Drainage from the campus flows overland and along parking lots and driveways in a southerly direction to Morning View Drive, where it collects in existing storm drains. The City of Malibu maintains policies to protect environmentally sensitive habitat areas within city limits, and new developments must be sited and designed to minimize impacts to the ESHA.

1.2.2 Surrounding Land Use

Surrounding land uses in the general vicinity of the Project Site include properties that are zoned Rural Residential (RR). These parcels are primarily developed with homes on lots that range between one to two acres in size. Single-family homes are to the north, west, and south of the Project Site. Immediately adjacent to the Project Site to the east is the Malibu Equestrian Park, which leases the District-owned property. The entirety of the District-owned property, including the former JCES campus, the MMHS campus, and the Equestrian Park, is zoned for institutional uses. To the south, across Morning View Drive, is the Malibu United Methodist Church and Nursery School. Los Angeles County Zuma Beach, a public beach, and PCH are approximately 1,000 feet and 1,500 feet southwest of the Project Site, respectively.

1. Introduction

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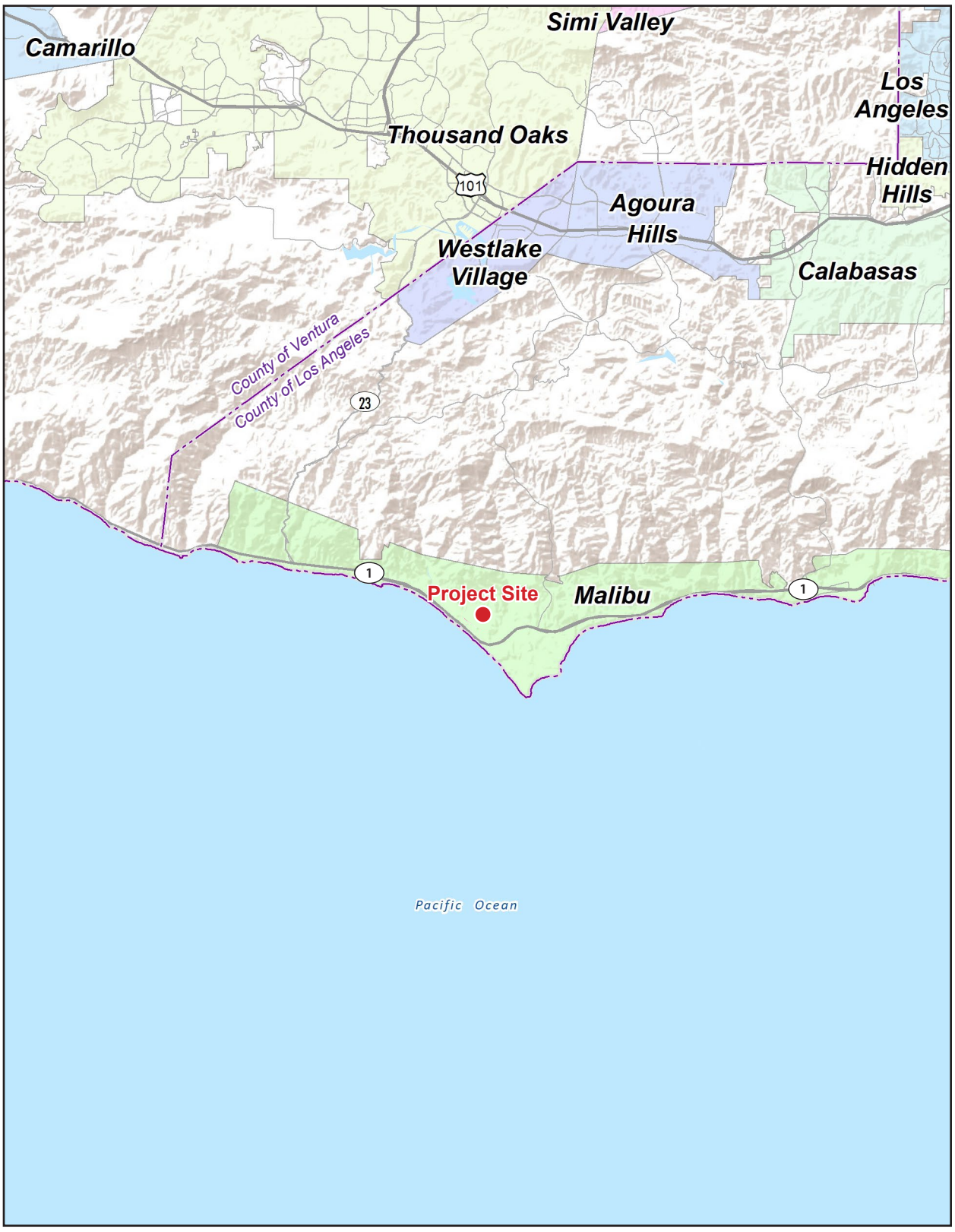
Figure 1 - Regional Location
1. Introduction



Note: Unincorporated county areas are shown in white.
Source: ESRI, 2020

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Scale (Miles)

1. Introduction

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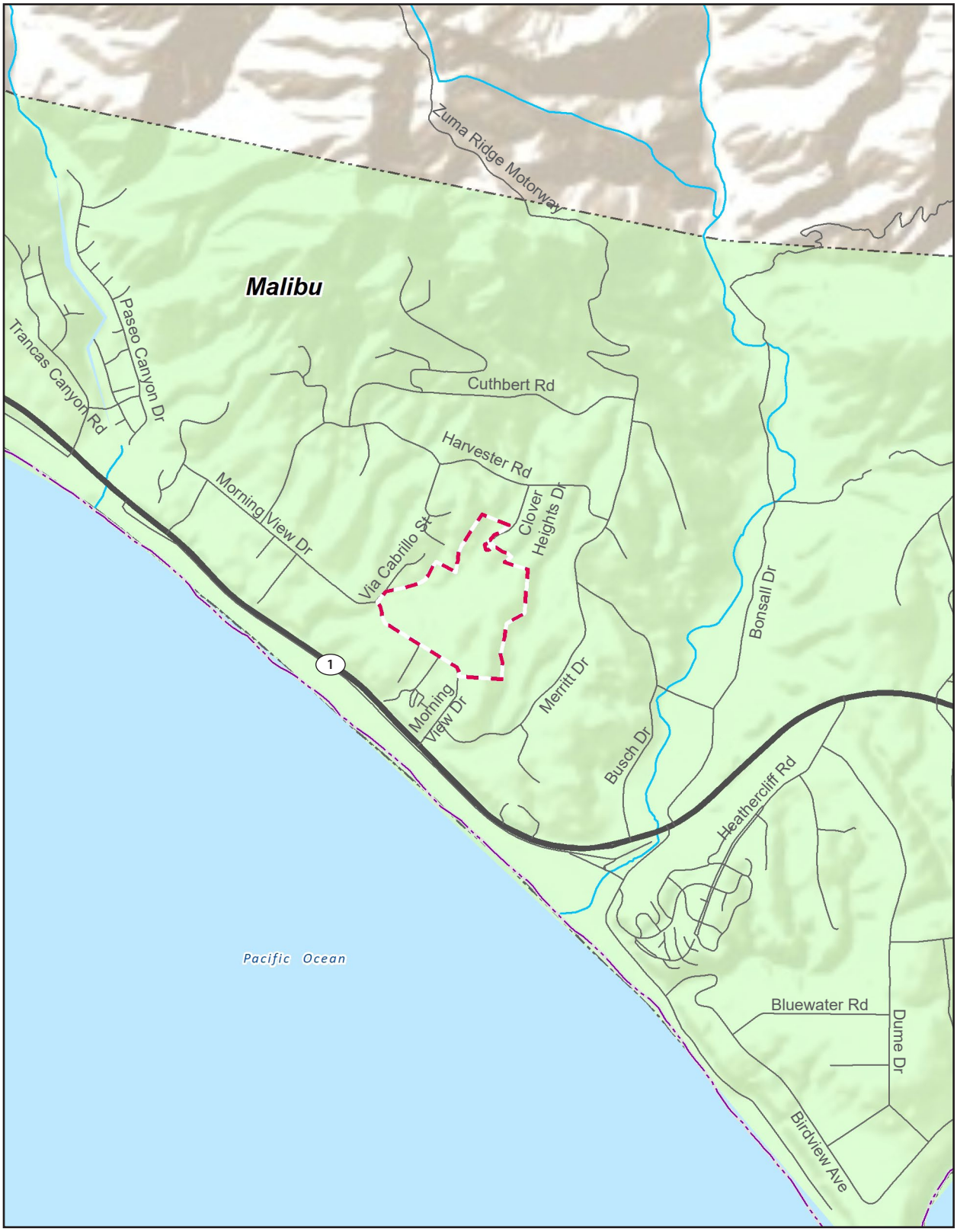
Figure 2 - Local Vicinity

1. Introduction



Project Boundary

Note: Unincorporated county areas are shown in white.

Source: ESRI, 2020

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Figure 3 - Aerial Photograph
1. Introduction

Project Boundary

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Scale (Feet)

Source: Nearmap, 2020

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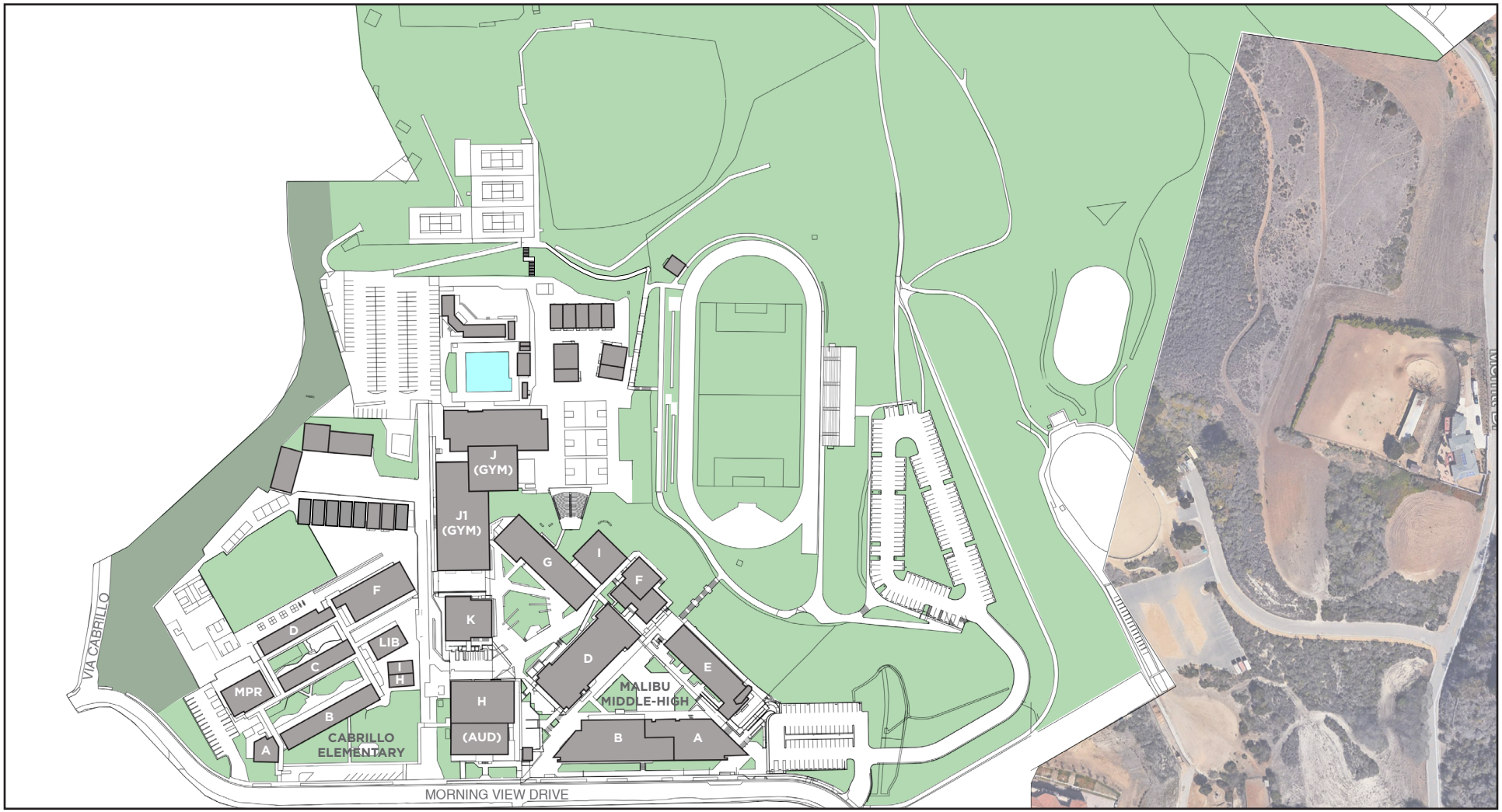
Figure 4 - Existing MMHS Campus Buildings and Facilities



Source: LPA, 2019

1. Introduction

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1.3 PROJECT DESCRIPTION

"Project," as defined by the CEQA Guidelines, means "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)…enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700" (14 Cal. Code of Reg. § 15378[a]).

Following is a detailed description of the proposed project's overall site plan and character and the various development components, elements, and improvements. Implementation of the proposed project requires approval of the by the City of Malibu of The Malibu Middle and High School Campus Specific Plan and the associated LCP amendments. Refer to Section 1.5.2 for more information regarding the Specific Plan.

1.3.1 Proposed Project

The Proposed Project would redevelop and modernize the existing MMHS campus and former JCES campus to create three distinct areas: Middle School Core, High School Core, and shared facilities. Implementation of the Proposed Project would result in demolition of all 11 buildings on the former JCES campus and 7 buildings on the MMHS campus, totaling 147,556 square feet of demolition. The currently constructed Building E and the under-construction Buildings A/B would remain, with all other structures removed (see Figure 5*, Proposed Site Plan*). No changes to the existing football/track, baseball, or softball fields would occur with the exception of the development of new field houses and additional parking adjacent to the softball field. The Proposed Project would not impact the Malibu Equestrian Park. As shown in Table 4, *Summary of New Development*, the Proposed Project would result in 32 classrooms and 8 labs and a total of 190,967 square feet of building space, providing the MMHS campus with a total of 47 classrooms and 12 labs and a total of 240,650 square feet of building space.

Table 4 Summary of New Development

Building	Status	Classroom	Lab	Square Footage	Maximum Height
Middle School Core					
Building D: Gymnasium/ Fitness/ PE and Student Activities and Food Services	New	2	0	22,376	36 ft
Middle School Core Subtotal		**2**		**22,376**	
High School Core					
Building C: Classrooms, Student Support Services, Administrative and Campus Support	New	23	8	85,391	36 ft
Building J: Gymnasium/ PE	New	2	0	36,708	45 ft
High School Core Subtotal		**25**	**8**	**122,099**	
Shared Amenities					
Building I: Special Education and Campus Wellness Center	New	1	0	5,094	28 ft
Building H: Visual and Performing Arts (VAPA)	New	4	0	30,094	45 ft
Building L: Aquatics Center/Field House	New	0	0	9,249	28 ft
Building M: Upper Field House	New	0	0	2,055	28 ft
Shared Amenities Subtotal		**5**		**46,492**	
Total – New Development		**32**	**8**	**190,967**	
Total – with Buildings A/B and Building E	**Existing**	**47**	**12**	**240,650**	

Source: LPA 2019.

1.3.1.1 MIDDLE SCHOOL CORE

The Middle School Core would be located at the southeastern portion of the campus with a level academic quad in the middle. The Middle School Core would consist of four buildings, including the existing Building E and the under-construction Buildings A/B. Building D would include a new middle school gym and a student activities and Food Services Building. Upon completion, the Middle School Core would result in 72,059 square feet of total development (49,683 of existing Building E and under construction Buildings A/B, and 22,376 square feet of new construction). The Middle School Core would include 17 total classrooms (8 classrooms in Building E, 7 in Buildings A/B, and 2 in Building D), administration offices, supportive services, a library, four science labs (in Buildings A/B), 2D art studio, lunch shelter, multipurpose room, gymnasium, and locker rooms.

The Buildings A/B will contain STEAM, student support services, and administration and supportive services, and will have 7 classrooms and 4 labs. Buildings A/B are two stories and 36,200 square feet, with a maximum height of 28 feet and oriented east-west along Morning View Drive. Building E houses the humanities department and has 8 classrooms. Building E is a two-story, 13,483-square-foot prefabricated modular building with a maximum height of 25.5 feet at the parapet, and it is located to the north of Buildings A/B. The construction and operation of these buildings were evaluated and cleared as part of a previous MMHS EIR (SCH#2008091059) and are included here for informational purposes only.

Building D would be located to the north and north west of the Buildings A/B, along the northern edge of the Middle School campus. Building D would house the physical education center and new student activities and food services. The physical education portion of the building would be one story and 16,932 square feet

and would house a 50-foot by 84-foot multipurpose court with storage, 6 rows of bleachers, a lobby and restrooms, and a physical education center with a fitness studio; storage; boys' and girls' lockers and restrooms; and staff office, shower, and restroom. The student activities and food services portion of Building D would be two stories and 5,444 square feet and would have a maximum height of 36 feet along the northern boundary. The student activities area would include maker space and the Associated Student Body (ASB) student store and storage areas, while the food services area would include a warming kitchen, food court, restrooms, and a 3,600-square-foot exterior sheltered lunch area. Building D would have a maximum height of 45 feet above grade to accommodate the gymnasium and would provide an accessible path to the hardcourt area on the upper level. The Middle School Core buildings would be arranged around a quad that would serve as a central gathering area for the Middle School students.

1.3.1.2 HIGH SCHOOL CORE

The High School Core would be located at the southwestern portion of the campus occupying the former JCES campus. Building C would be two stories and approximately 85,391 square feet and would include 25 classrooms, administration offices, supportive services, a library, 6 science labs, Art 3D sculpture/ceramics studio, lunch shelter, and a career center. Building C would be designed to fit the natural topography of the site, such that the southern portion of the building fronting Morning View Drive would have a maximum height of 36 feet above grade, while the northern portion, adjacent the slope that separates the two pads, would have a maximum height of 45 feet.

In addition to Building C, the High School Core would include an approximately 36,708-square-foot main gymnasium and an approximately 4,256-square-foot dance/weights rooms (Building J), which would be located in the center of the campus adjacent to the hardcourts. Building J would have a maximum height of 45 feet and would include team rooms and four CIF regulation hardcourts for indoor sports.

1.3.1.3 SHARED USES

In addition to developing the Middle School and High School Core areas, the Proposed Project would develop new shared facilities. These shared facilities would include a performing arts center (Building H), wellness center and spaces for special education (Building I), aquatics center/field house (Building L), and pool. As shown in Figure 5, the new shared facilities would be built to the north of the Middle School and High School Cores and west of the existing football/soccer/track and field. The Boys & Girls Club building would be relocated next to the tennis courts near the northwestern portion of the campus. Under the Proposed Project, Building H would have a maximum height of 45 feet above grade for the Theater portion, and 36 feet above grade for the remainder of the performing arts facilities. Buildings I, L and M would be a maximum of 28 feet above grade.

Shared Sport and Recreational Facilities

In addition to the new gymnasium, weight room, aquatic center and locker rooms, the existing athletic field, baseball, and softball fields would receive minor improvements. A new field house (Building M) would be constructed for the baseball and softball fields, and one for the athletic field (Building L). Additionally, the Proposed Project would add two new tennis courts to the existing tennis court area on the northern side of the Project Site. The Proposed Project would also extend pedestrian trails throughout the Project Site to

improve pedestrian circulation. The pedestrian trails would include turnouts, which would be used as outdoor classroom space.

1.3.1.4 STUDENT CAPACITY AND SCHEDULE

The existing MMHS campus was constructed as Malibu Park Junior High School beginning in 1963, and in 1992 the school was converted for use as a high school. The buildings no longer meet the District's needs for flexible classrooms with the ability to support multiple learning zones. The Proposed Project would modernize the campus facilities and retain the total capacity of 1,200 students (750 high school students and 450 middle school students), which is consistent with historical enrollments (in 2013 the middle school had 466 students in grades 6-8 while the high school had 692, for a total of 1,158 students). While enrollment has declined in recent years, with only 939 students during the 2018-19 school year (337 middle school students and 602 high school students), the District is moving from a traditional classroom and instructional model to a progressive, project-based learning model; as a result, class sizes, support spaces, community areas, and collaboration zones require more space from the school design of the past. The Proposed Project is intended to upgrade and enhance both campuses structures and facilities to meet the District's Education Specifications and better accommodate the student population.

School hours would remain generally from 8:00 AM to 3:00 PM, with staff and students of the middle/high school arriving on campus between approximately 7:00 AM and 8:00 AM and leaving between approximately 3:00 PM and 5:00 PM, with occasional special events and athletic events during weeknights and/or weekends. Additionally, the Visual and Performing Arts program uses the auditorium after school typically until 6:00 PM, and the Boys & Girls Club on the campus is open Monday through Friday from 9:00 AM to 6:30 PM.

Community/Civic Center Use

When the school facilities are not in use and are not scheduled for school-sponsored or other District-related events, the Civic Center Act permits community organization and members to utilize school facilities for their events by obtaining a Civic Center Permit from the SMMUSD or the City of Malibu (California n.d.). Permitted events may include community and/or city use of the playfields, common areas, and classrooms, as permitted in the 2019 Master Agreement between SMMUSD and the City of Malibu Regarding the Joint Use of School District Facilities (SMMUSD/City of Malibu 2019). Operation of the school facilities for community use may occur outside normal school operating hours, generally between 3:00 PM and 10:00 PM on weekdays, and between 8:00 AM and 10:00 PM on Saturday and Sundays. Parking for Civic Center uses would be provided in the school's on-site surface parking lots. As the Proposed Project would develop additional facilities, there may be a commensurate increase in community use with implementation of the Proposed Project. Table 5, *Existing and Buildout Community Use Facilities*, shows the existing facilities available for community use and the proposed facilities.

Table 5 Existing and Build Out Community Use Facilities

Name	Square Footage
Existing Community Use Facilities	
MMHS Building H (600 Building): Cafetorium	14,478
MMHS Building J (Building 700): Gymnasium	20,758

Table 5 Existing and Build Out Community Use Facilities

Name	Square Footage
MMHS Building J1: 'New' Gymnasium	18,835
MMHS Building K: Classroom Building	12,698
JCES Building E: Library	2,694
JCES Building G: Multipurpose Room Building	4,758
Pool	1
Track and Field	1
Baseball Field	1
Softball Field	1
Tennis Courts	4
Subtotal Existing	**74,221**
Proposed Community Use Facilities	
Building D: Middle School Gymnasium/ Fitness/ PE	16,932
Building J: High School Gymnasium	36,708
Building H: Shared Visual and Performing Arts (VAPA)	30,094
Building L: Aquatics Center/Field House	9,249
Building M: Upper Field House	2,055
Pool	1
Track and Field	1
Baseball Field	1
Softball Field	1
Tennis Courts	6
Subtotal Proposed (Buildout):	**95,038**
Net Increase	**20,817 and Two Tennis Courts**

Source: SMMUSD 2019.

1.3.1.5 SITE ACCESS, CIRCULATION, AND PARKING

Site access would remain along Morning View Drive, with a centrally located drop-off area for buses and parents/guardians between the Middle School and High School Core areas. A total of 451 parking spaces would be developed under the Proposed Project. The 150-Space Parking Lot and the Lower Parking Lot are renamed Parking Lot A and Parking Lot B, respectively, and would continue to have 150 and 62 parking spots. The new drop-off/pick-up area would be able to accommodate up to five school buses and would have 13 parking spaces for visitor use (Parking Lot C).

Parking Lot D would be a new, approximately 185-space parking lot that would be developed to the north of Building C and would be accessed by a new entryway along the western edge of the campus from Morning View Drive. Parking Lot E would be constructed during Phase 3 and would have 27 parking spots and be connected by the shared driveway to serve both the High School and the Boys & Girls Club. A small parking lot (Parking Lot F) with approximately 14 spaces would be developed along the northeastern boundary of the softball field with access from Clover Heights Avenue. Table 6, *Campus Specific Plan Buildout Parking Count*, shows the name and parking count for each lot.

Table 6 Campus Specific Plan Buildout Parking Count

Existing Parking Lot	Proposed Parking Lot	Count
150-Space Parking Lot	Parking Lot A	150
Lower Parking Lot	Parking Lot B	62
	Parking Lot C (New)	13
	Parking Lot D (New)	185
	Parking Lot E (New)	27
	Parking Lot F (New)	14
Total		**451**

Source: SMMUSD 2020.

Additionally, the Proposed Project would include a pedestrian trail system that starts along the Environmentally Sensitive Habitat Area (ESHA) on the west and connects to a larger system of existing walking trails around the Equestrian Park and surrounding hills. Fencing would surround the entire campus. Ornamental fencing near Morning View Drive and the proposed buildings would allow the MMHS and former JCES campuses to be secure during school days and would reinforce a single point of entry for each school. Chain-link fencing would run along the east, north, and west sides of the Project Site.

1.3.1.6 INFRASTRUCTURE

Utility improvements necessary to serve the proposed replacement buildings would be constructed. The future on-site utilities would connect to existing facilities serving the site. The proposed domestic and fire water lines would connect to the existing 12-inch public water main located on Morning View Drive. Currently, 11 septic tanks exist on the former JCES and MMHS campuses. The Proposed Project would upgrade the existing septic system. As shown in Figure 6, *Conceptual Utility Layout: Phase 1*, and Figure 7, *Conceptual Utility Layout: Phases 2–4*, five septic tanks would be developed under the Proposed Project:

- Septic 1 in Parking Lot D, serving Building C
- Septic 2 in the Middle School Quad, serving Building D
- Septic 3 under the Middle School Hard Courts, serving Buildings H, I, J, and L
- Septic 4 under Parking Lot E, serving the Boys & Girls Club
- Septic 5 adjacent the existing Tennis Courts, serving Building M

A shown in Figure 8, *Conceptual Storm Drain and Water Quality: Phase 1*, and Figure 9, *Conceptual Storm Drain Water Quality: Phases 2–4*, the Project Site would be divided into seven drainage management areas (DMA). DMAs A, B, and E would drain to the existing ESHA, and DMAs C, D, F, and G would drain to Morning View Drive. New stormwater retention basins would be developed to infiltrate and treat runoff from the Proposed Project. Table 7, *Proposed Stormwater Management Systems*, provides the area of the DMAs and the capacity of the new treatment basins.

Table 7 Proposed Stormwater Management Systems

Drainage Management Area (Acres)	Water Quality BMP (square-feet)
DMA A – 3.08	11,000
DMA B – 3.05	10,000
DMA C – 1.15	4,000
DMA D – 3.10	11,000
DMA E – 3.26	11,400
DMA F – 1.90	7,000
DMA G – 1.37	5,000
Total	**59,400**

Source: LPA 2019.

1.3.1.7 LIGHTING

The Proposed Project's lighting program would be consistent with the City of Malibu's Dark Sky Ordinance. All campus lighting would also be designed to provide for the security and safety of students, staff, and visitors. Night lighting would include existing and new campus parking lots, pedestrian pathways, pool lighting, and other nighttime security- and safety-required lighting. Pool lighting would be regulated by the requirements of California Building Code (CBC) Section 3115B.1, requiring sufficient illumination that lifeguards have direct view of all areas of the pool surface and diving appurtenances.

Maintenance and custodial staff typically leave the campus at 11:00 P.M., as such, consistent with the existing lighting program on the MMHS Campus, the nighttime lighting would be controlled by an automatic timer and would be programmed to turn off at 11:30 PM each evening. On a limited number of occasions when school activities are scheduled to extend past 10:00 PM, such as an MMHS sports teams returning to campus following an "away" game or when a SMMUSD School Board meeting is held on campus, the programmed lights' off time would be overridden to accommodate such authorized uses. The Proposed Project would not change or modify the restrictions imposed on the Athletic Field lighting (CDP 12-024), or the lighting associated with the 150-space Parking Lot A under the existing CDP (CDP No. A-MAL-13-030).

1.3.1.8 LANDSCAPING

Landscaping would be provided along pathways, building perimeters, and within and around new parking lot areas. Landscaping would be consistent with the requirements of the City of Malibu's Municipal Code, Chapter 9.22, "Landscape Water Conservation." Such requirements include that plants must be grouped into hydrozones—that is, with other plant species having similar water demand—and by their soil, sun, and shade requirements. Additionally, irrigation systems would be designed to prevent runoff, overspray, low-head drainage, and similar conditions where irrigation water flows or sprays onto unintended areas, such as walkways, driveways, roadways, neighboring properties, or the public right-of-way.

1.3.2 Project Phasing

The Proposed Project would be constructed in four phases, with construction activities anticipated to begin in fall 2022 and completed in summer 2030. Each phase would include the following activities—grading and

excavation, trenching for site utilities, demolition and construction of the buildings, paving, and finishing. It is anticipated that students would occupy existing buildings on the MMHS campus during construction activities. With the completion of Phase 1, the majority of the Proposed Project's classrooms would be constructed. Therefore, it is not anticipated that portable classrooms, beyond those currently on campus, would be used to house students or staff during construction.

Phase 1 would consist of demolition of existing former JCES campus buildings and construction of the High School Core. Phase 2 would consist of construction of the Building D. Phase 3 would consist of demolition of MMHS Buildings F, I; the existing field house; and the portables adjacent the existing pool, and construction of Buildings J, L, and M and Parking Lot F. Phase 4 would include two subphases—Phase 4A would involve the demolition of Buildings K, J, J1; the pool and pool building; and bus barn, and the relocation of the Boys & Girls Club and construction of the new Buildings H and I. Phase 4B would involve the demolition of the existing theatre building and construction of the new drop-off/pick-up area and Parking Lot E. Construction activities would lead to 16,470 cubic yards (cy) of cut and 13,692 cy of fill material. Table 8*, Proposed Project Phasing***,** provides details for each construction phase, including timing, amount of demolition, new construction, and infrastructure improvements for each phase. Figures 10A through Figure 14B depict the Proposed Project Phasing.

Table 8 Proposed Project Phasing

Phase	Demolition	Demolition Square Footage	New Construction	New Construction Square Footage	Infrastructure Improvement	Timeline
1	JCES Buildings A, B, C, D, E, F, G, H, I, P1–P5	40,844	Building C, Parking Lot D	85,391	• DMA A • DMA B • Septic 1	Fall 2021 – Fall 2024
2	N/A	N/A	Building D, Middle School Quad	22,376	• DMA C • Septic 2	Fall 2024 – Fall 2026
3	MMHS Buildings F, I, Field House and Portables	25,171	Buildings J,L, and M, Parking Lot E, Parking Lot F	43,756	• DMA D • Septic 3 • Septic 5	Fall 2026 – Fall 2028
4A	MMHS Building K, J, J1, Pool, Pool Building, Boys & Girls Club (relocated)	53,191	Building H and I, Boys & Girls Club (relocated)	56,816	• DMA E • DMA F • Septic 4	Fall 2028 – Fall 2030
4B	MMHS Building H	14,478	Drop-off/Pick-up, Parking Lot C	N/A	• DMA G	Spring 2030 – Spring 2031

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1.3.2.1 GRADING

Previous construction and grading at the Project Site have created a series of near-level building pads for existing structures and paved parking lots. The majority of the Project Site, including all areas with current development, is situated on slopes of between 0 and 20 percent, at a minimum of 80 feet above mean sea level (amsl). Around the perimeter of the Project Site, surrounding the football field, and between building pads, slopes increase to between 40 to 100 percent, reaching up to 170 feet amsl. For the most part, proposed new construction would take place on the flat, previously developed areas of campus, and existing slope conditions

would remain. However, each construction phase would do substantial grading. Table 9, *Proposed Project Cut/Fill by Phase*, details the total amount of soil to be graded for each phase.

Table 9 Proposed Project Cut/Fill by Phase

Phase	Cut (cy)	Fill (cy)	Net Cut/Fill (cy)	Contingency (cy)	Project Phase Total (cy)
1	16,992	21,470	4,478 (Fill)	4,953 (Cut)	475 (Cut)
2	4,449	24	4,425 (Cut)	924 (Cut)	5,349 (Cut)
3	21,834	13,697	8,137 (Cut)	2,509 (Cut)	10,646 (Cut)
4	9,717	28,671	18,954 (Fill)	5,262 (Cut)	13,692 (Fill)
Total	**52,992**	**63,862**	**10,870 (Fill)**	**13,648 (Cut)**	**2,778 (Cut)**

Source: LPA 2019.

1.4 EXISTING ZONING AND GENERAL PLAN

The Project Site is designated for institutional use in the Land Use and Zoning section of the City of Malibu's Local Coastal Program. Both the land use designation and zoning of the campus allow for public school use. According to the City of Malibu's LCP, the Institutional District accommodates existing public and quasi-public facilities, which include educational, religious, and governmental facilities.

Although the California legislature has granted school districts the power to exempt their school construction projects from the general plan and zoning requirements of the jurisdictions in which their facilities are located (provided the school district complies with the terms of Government Code section 53094), the Proposed Project is consistent with the City of Malibu's General Plan and zoning designations and is subject to the policies and provisions of the City of Malibu's LCP.

1.5 REQUIRED PERMITS AND APPROVALS

As required by CEQA Guidelines, this section provides, to the extent the information is known to the SMMUSD, a list of the agencies that are expected to use the environmental analysis of the Proposed Project in their decision-making. This section also lists the permits and other approvals required to implement the Proposed Project.

1.5.1 Lead Agency Approval

SMMUSD is the lead agency under CEQA and is carrying out the Proposed Project. In order to approve the Proposed Project, the SMMUSD Board of Education must first certify the Final EIR (FEIR). The Board will consider the information in the EIR when making its decision to approve or deny the Proposed Project, or in directing modifications to the Proposed Project in response to the EIR's findings and mitigation measures. The EIR is intended to disclose to the public the Proposed Project's details, analyses of the Proposed Project's potential environment impacts, and identification of feasible mitigation or alternatives that will lessen or reduce significant impacts to less than significant levels.

1.5.2 Specific Plan Approval

The Malibu Middle and High School Campus Specific Plan is proposed to regulate the project. Adopting the Specific Plan is a discretionary, legislative, decision that must be made by the City of Malibu's City Council. In order to meet the District's Education Specifications, the California Interscholastic Federation, the National Federation of State High School Association, the District is proposing that Buildings D, C, H and J exceed the LIP's 28-foot height requirements. Additionally, the labs located in Building C would require fume hoods that would exceed the height restrictions for rooftop mounted equipment. Development standards established under the Specific Plan include the building specifications such as heights, setbacks, design standards for landscaping and signs. Table 10, *Specific Plan Variances* provides a listing of the City's LCP requirements and the deviations that the Specific Plan is requesting.

Table 10 Specific Plan Variances

City of Malibu LIP Section Number	Requirement	Proposed	Notes
3.9.A1a	Structures shall not exceed a maximum height of 18 feet above natural or finished grade, whichever results in a lower building height, except for chimneys, rooftop antenna, and light standards. The maximum height of the structure may be increased up to 28 feet for a flat or pitched roof if approved through a site plan review pursuant to Section 13.27 of the Malibu LIP	Building J: Gym/PE – 45 feet maximum height.	Gymnasiums must meet NFHS minimum interior height requirement of 23 feet clear from floor to ceiling for CIF Volleyball, we plan for 25' for adequate tolerance in design and construction. Add 10' for long span structure and 5' for roof slope and parapet.
		Building H: Theater/Performing Arts – 45 feet maximum height	High School Performing Arts facilities require a vertical stage opening of 24' (to the bottom of the proscenium). In addition, the long span structure and tension lighting grid ceiling system will add 15 feet above the stage opening plus 5' for roof slope and parapet. This equates to a total height of 44 feet. This allows for the school to produce the types of theatrical performances expected in a high school theater curriculum.
		Building D: Middle School Gym/MPR - 36 feet maximum height.	Gymnasiums must meet the National Federation of State High School Association, (NFHS) minimum interior height requirement of 23 feet clear from floor to ceiling for competitive Volleyball, we plan for 24' for adequate tolerance in design and construction.
		Building C: High School Building – 34 feet maximum height.	Building C north wing, second floor contains high bay/ high volume spaces to house the Library, Student Union and Career Center. These high bay spaces are required to provide

Table 10 Specific Plan Variances

City of Malibu LIP Section Number	Requirement	Proposed	Notes
			the students with adequate functioning spaces conducive to 21st Century learning as defined in the Campus Plan Education Specifications. The Student Union is programmed with a central space of 4,000 sf space. The interactive, collaborative nature of this space requires an appropriate high-volume ceiling. A high school Library, based on the District's Educational specifications, require a variety of spaces within the Library, including a large 3,000 sf area that can double as Staff Development space.
3.9A.1b	Roof-mounted mechanical equipment shall be integrated into the roof design, screened, and may project no more than two feet higher than the structure roof height (screens included) if approved through a site plan review pursuant to Section 13.27 of the Malibu LIP.	Building C: Science Labs require fume hoods with exhaust stacks placed at a minimum of 10 feet above the roof surface	Limited rooftop equipment will exceed the 2' maximum height above roof plane for fume hoods over Science Labs, as required by the American National Standard for Laboratory Ventilation ANSI Z9.5 as well as the National Fire Protection Association Standard NFPA 45, Chapter 7, section 7.2.
		Building C: Parapets and or Guardrails that project up to 42 inches in height above the surface of the roof.	Roof top will be occupied by students to support outdoor learning, including visual observation to ESHA. With student access to roof deck, higher parapets or Guards are required to be 42" minimum height per California Building Code, Part 2, Volume 1, Chapter 10, section 1015.
3.9.A1d	Sports field lighting shall be limited to the main sports field at Malibu High School and subject to the standards of LIP Sections 4.6.2 and 6.5.G.	Night time pool lighting	Aquatics Facilities require lighting within the pool and above the pool deck per California Building Code, chapter 31B, Section 3115B "Pool Lighting
3.15.3.J	Automatic changing signs or electronic message center signs, except for public service time and temperature	Separate electronic Marquees are proposed for both the Middle and High schools	Marquee sign(s) for High School and Middle School required by the District for proper communications with the Students/ Community. Marquee signs serve a multitude of communication needs including emergency and safety communications.

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Table 10 Specific Plan Variances

City of Malibu LIP Section Number	Requirement	Proposed	Notes
4.6.	New development adjacent to the riparian habitats shall provide native vegetation buffer areas of no less than100 feet to serve as transitional habitat and provide distance and physical barriers to human intrusion. Buffers shall be of a sufficient size to ensure the biological integrity and preservation of the habitat they are designed to protect. Vegetation removal, vegetation thinning, or planting of non-native or invasive vegetation shall not be permitted within buffers except as provided in Section 4.6.1 (E) or (F) of the Malibu LIP.	The current District development including the vacated Cabrillo ES, District Bus Barn facilities, parking lots, drive aisles and fencing/ site structures extend up to the edge of the ESHA and in some instances into the ESHA, with no set back.	The Campus Plan proposes to remove existing parking and drive aisles and maintain 50-foot buffer from ESHA with the exception of a meandering deconstructed granite walking path adjacent the ESHA for instructional stations.
8.3.B.	Maximum Quantity of Grading. Notwithstanding any other provisions of the Malibu LIP, grading per lot of residential development, per acre of commercial development, or per acre of institutional development(total cut and fill) is limited to 1,000 cubic yards (per items a, b, c and d).	Proposed Project will exceed the grading limitations.	
8.3.C	Maximum Height of Cuts and Fills with Retaining Walls. 6 feet in height for any one wall, or 12 feet for any combination of walls, where a minimum 3-foot separation exists between walls, except single cuts up to 12 feet in height which are an integral part of the structure are permitted. Retaining walls shall be designed with smooth, continuous lines that conform to the topography.	Building C would serve as retaining wall.	

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If adopted, the Specific Plan would be the governing document for development on the site. The purpose of the Specific Plan is to provide a foundation for the proposed phased development on the campus through the application of regulations, standards and design guidelines. A Specific Plan provides a comprehensive plan for the Campus Plan as a whole, rather than needing to request variances for each phase and its attending CDP.

1.5.3 Other Required Permits and Approval

A public agency other than the lead agency that has discretionary approval power over a part of a project is known as a "responsible agency," defined by CEQA Guidelines section 15381. The responsible agencies and their corresponding approvals for the Proposed Project may include:

- Regional Agencies
  - Los Angeles Regional Water Quality Control Board (RWQCB) (Issuance of waste discharge requirements)
  - South Coast Air Quality Management District (SCAQMD) (Rule 1166 VOC Contaminated Soil Mitigation Plan)
- County of Los Angeles
  - Fire Department (Approval of Site Plan for Emergency Access)
  - Los Angeles Department of Public Works (Water District 29)
- City of Malibu
  - Public Works/Engineering (for grading permit)
  - Planning Commission (for Coastal Development Permit, Conditional Use Permit, Variances, Site Reviews)
  - City Council (For Specific Plan approval)

1.5.3.1 OTHER REVIEWING AGENCY ACTIONS AND APPROVALS

Other agencies include those agencies that do not have discretionary powers, but which may review the Draft EIR for adequacy and accuracy. Potential other agencies may include:

- Federal
  - U.S. Fish and Wildlife Services (USFWS)
- State of California
  - Division of State Architect (Approval of Construction Drawings)
  - Office of Historic Preservation (OHP)
  - Department of Transportation (Caltrans)
  - Resources Agency
  - California Coastal Commission (CCC)
  - California Department of Fish and Wildlife (CDFW)
  - Department of Conservation (DOC)
  - Department of Parks and Recreation (DPR)
  - Native American Heritage Commission (NAHC)
  - California Highway Patrol (CHP)
- Regional Agencies

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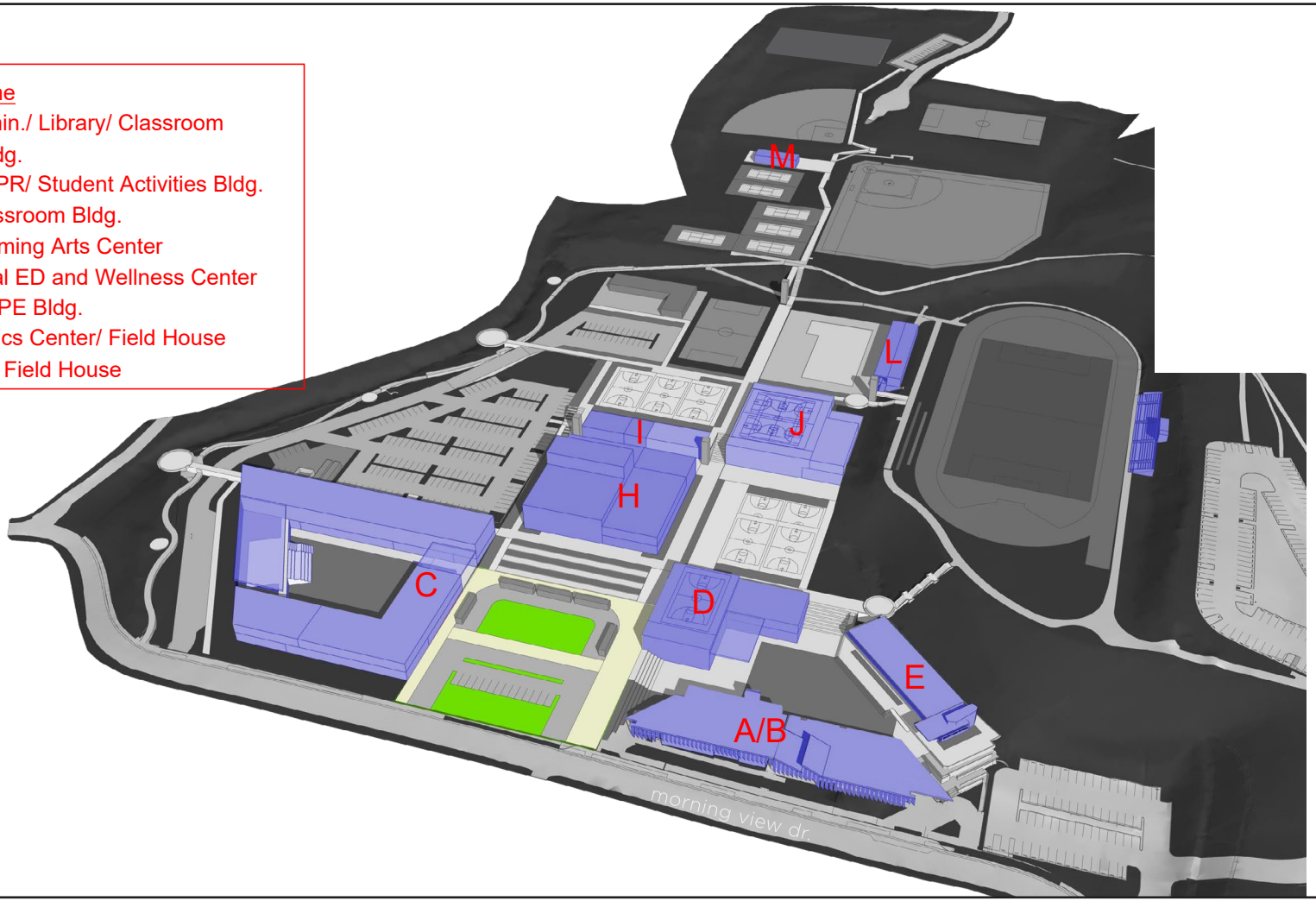
- Los Angeles RWQCB (Construction General National Pollution Discharge Elimination System [NPDES] Permit)
- Los Angeles County Sherriff's Department (LACSD)
- Los Angeles County Fire Department (LACoFD)
- Los Angeles Forestry Division
- Southern California Association of Governments (SCAG)

- City of Malibu
  - Environmental Community Development

Figure 5 - Proposed Site Plan

LEGEND

BLDG. #	BLDG. Name
A/B	(E) MS Admin./ Library/ Classroom
C	New HS Bldg.
D	New MS MPR/ Student Activities Bldg.
E	(E) MS Classroom Bldg.
H	New Performing Arts Center
I	New Special ED and Wellness Center
J	New Gym/ PE Bldg.
L	New Aquatics Center/ Field House
M	New Upper Field House



Source: LPA, 2019

1. Introduction

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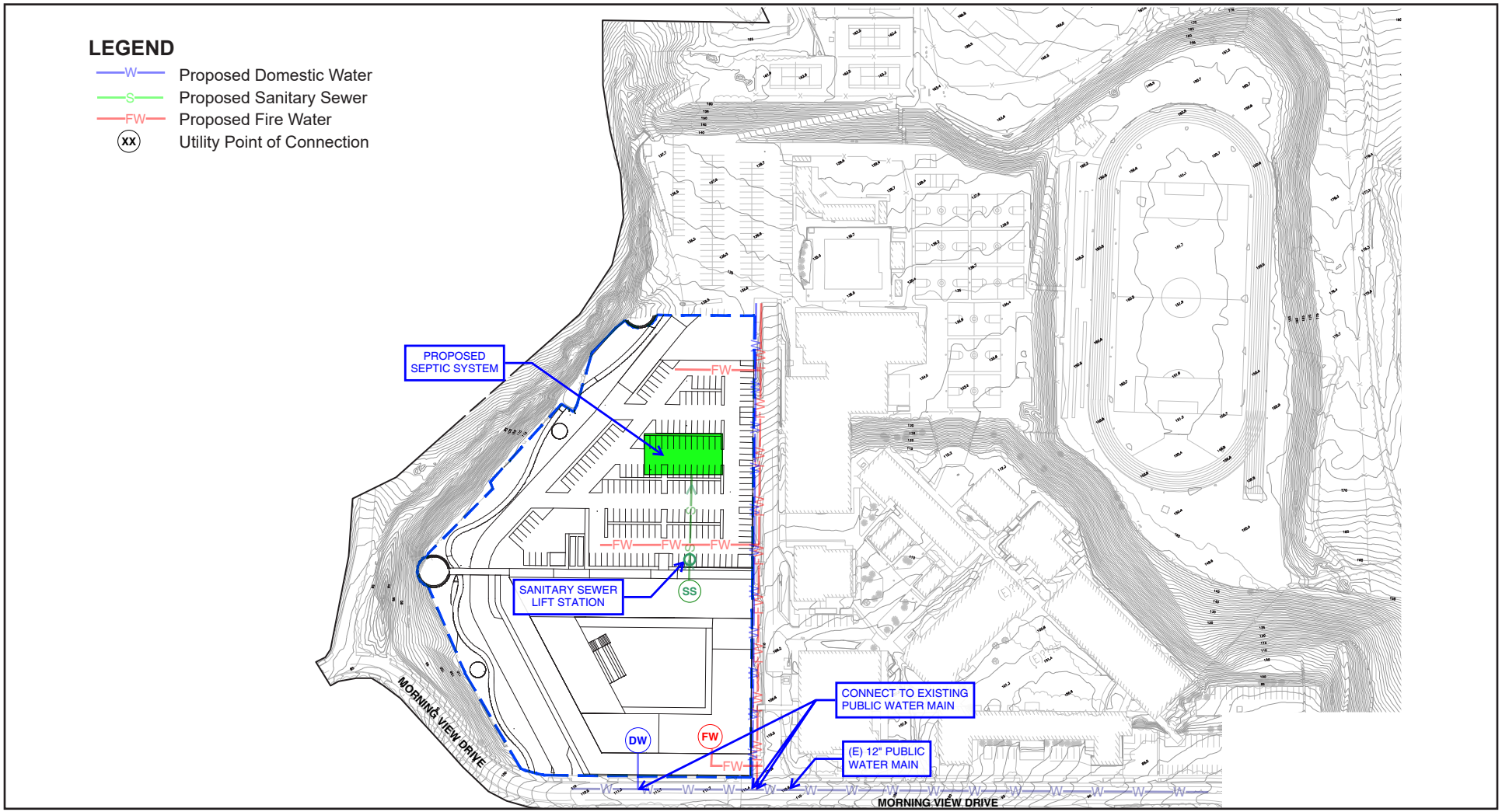
Figure 6 - Conceptual Utility Layout: Phase 1



Source: LPA, 2019

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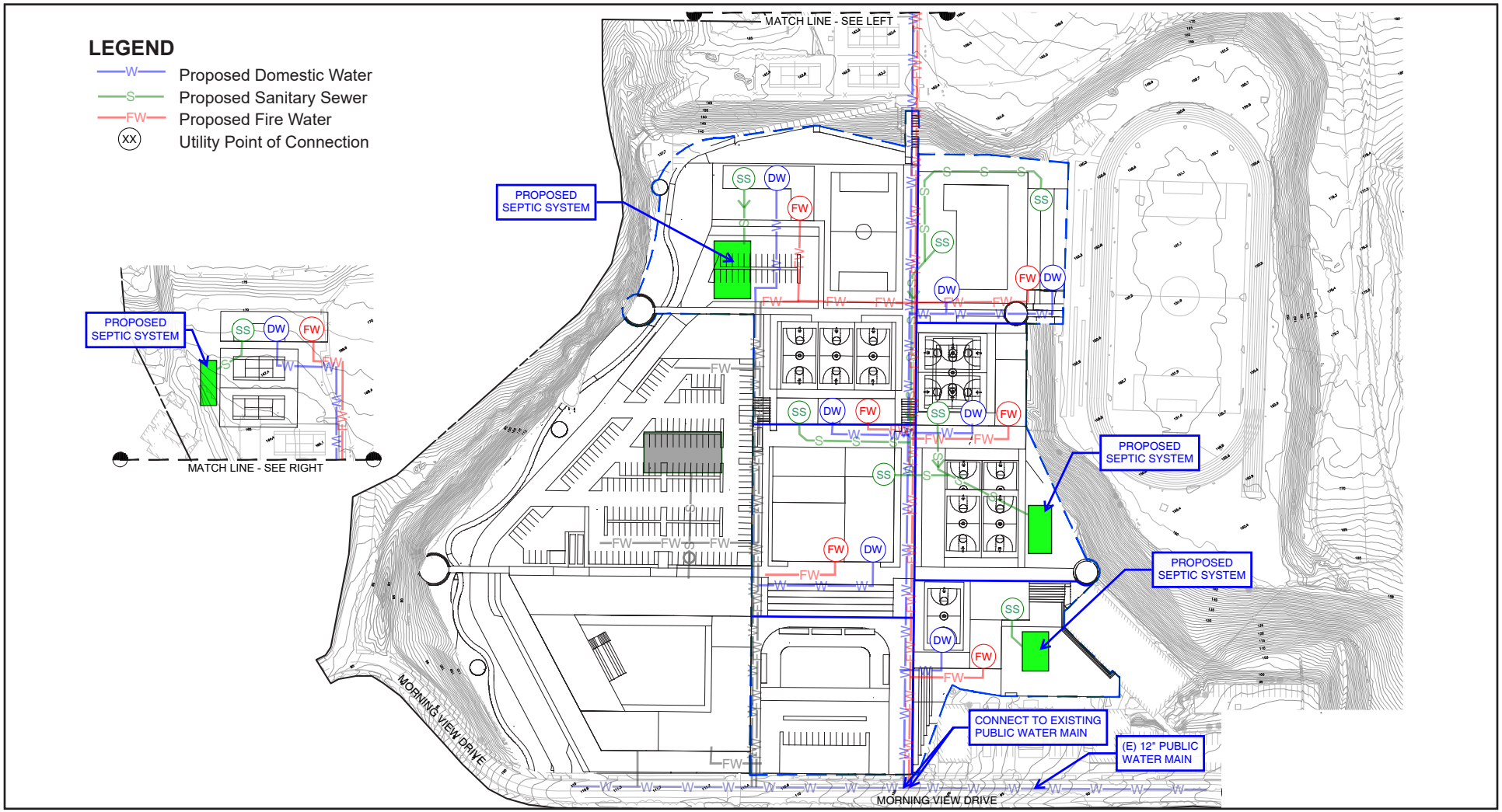
Figure 7 - Conceptual Utility Layout: Phases 2 to 4



Source: LPA, 2019

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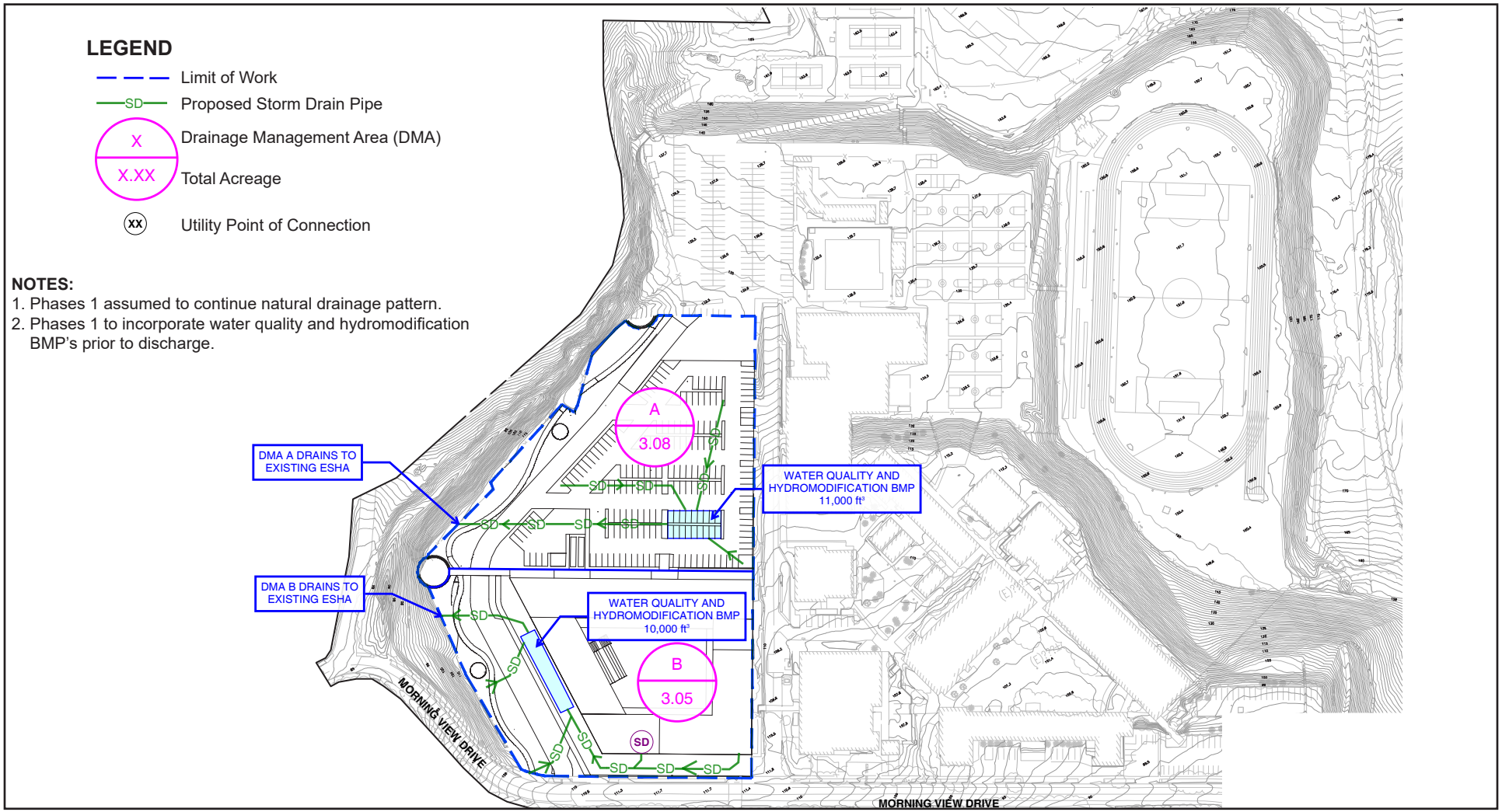
Figure 8 - Conceptual Storm Drain and Water Quality: Phase 1



Source: LPA, 2019

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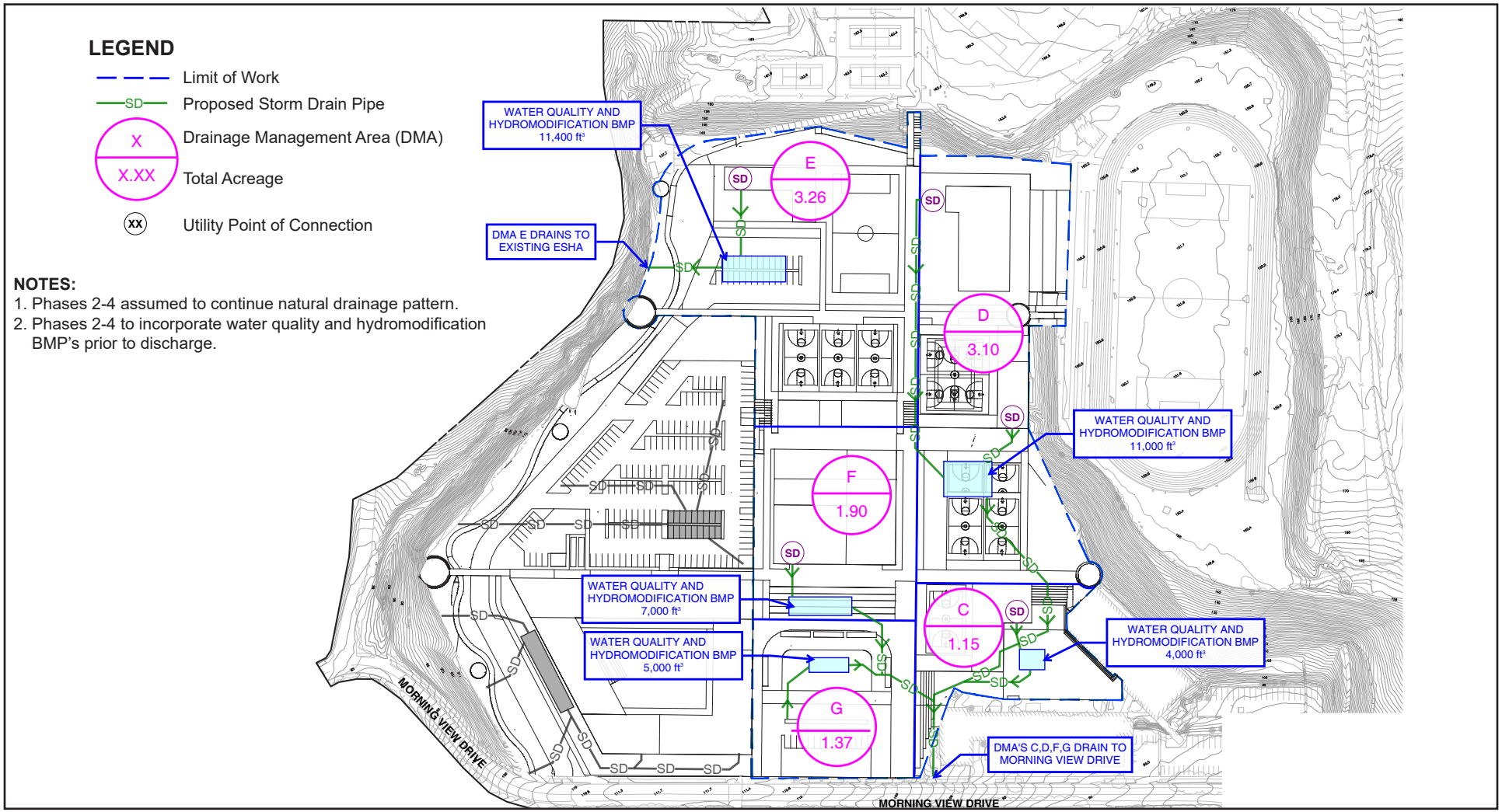
Figure 9 - Conceptual Storm Drain and Water Quality: Phase 2



Source: LPA, 2019

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Figure 10a - Phase 1 Proposed Demolition

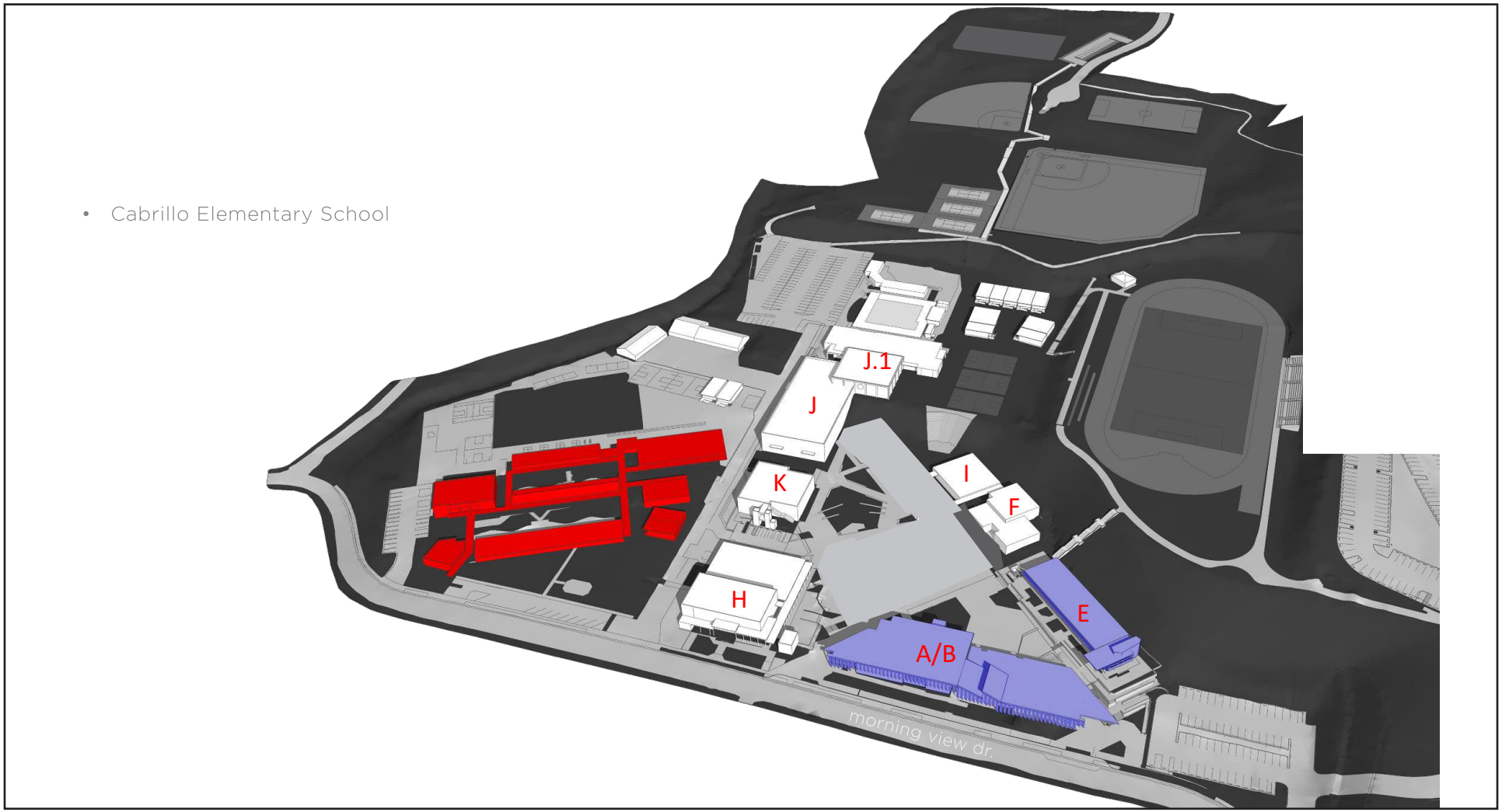

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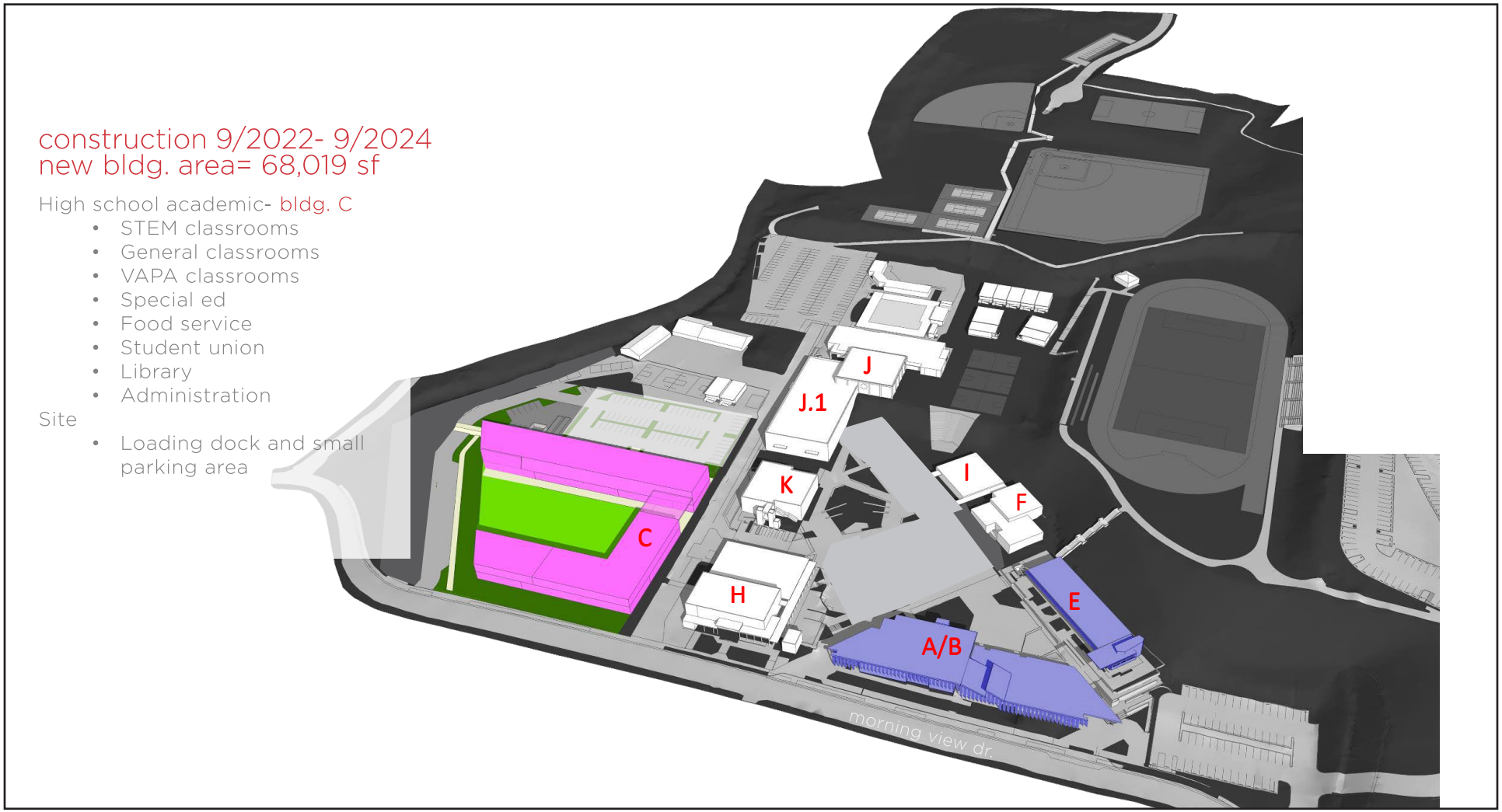
Figure 10b - Phase 1 Proposed Construction Plan



Source: LPA, 2019

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Figure 11 - Phase 2 Proposed Construction Plan

construction 9/2024- 9/2026
new bldg. area= 22,376 sf

- MS gym/MPR- bldg. D
  - MS PE classrooms
  - MS student activities
- MS lunch shelter

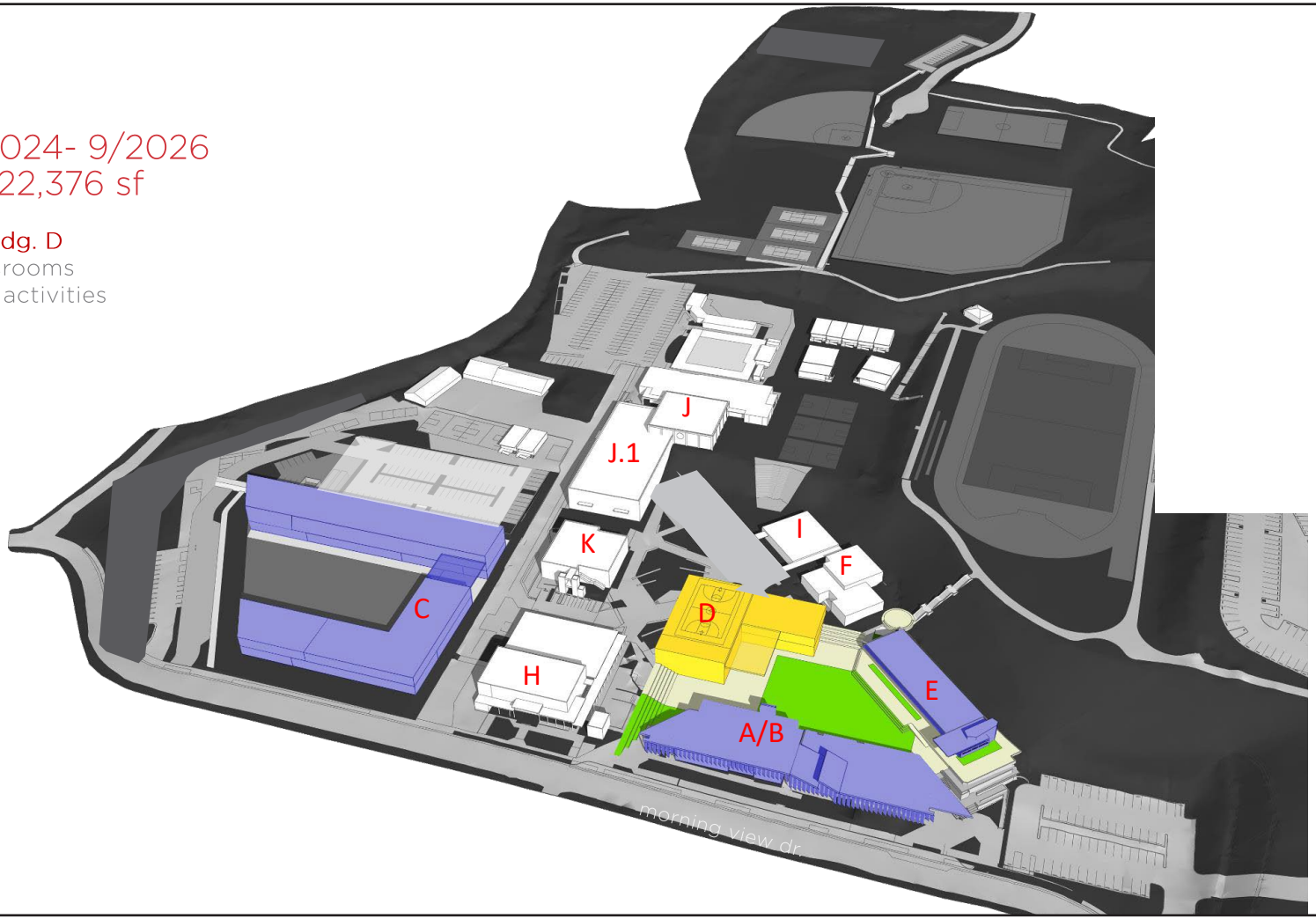

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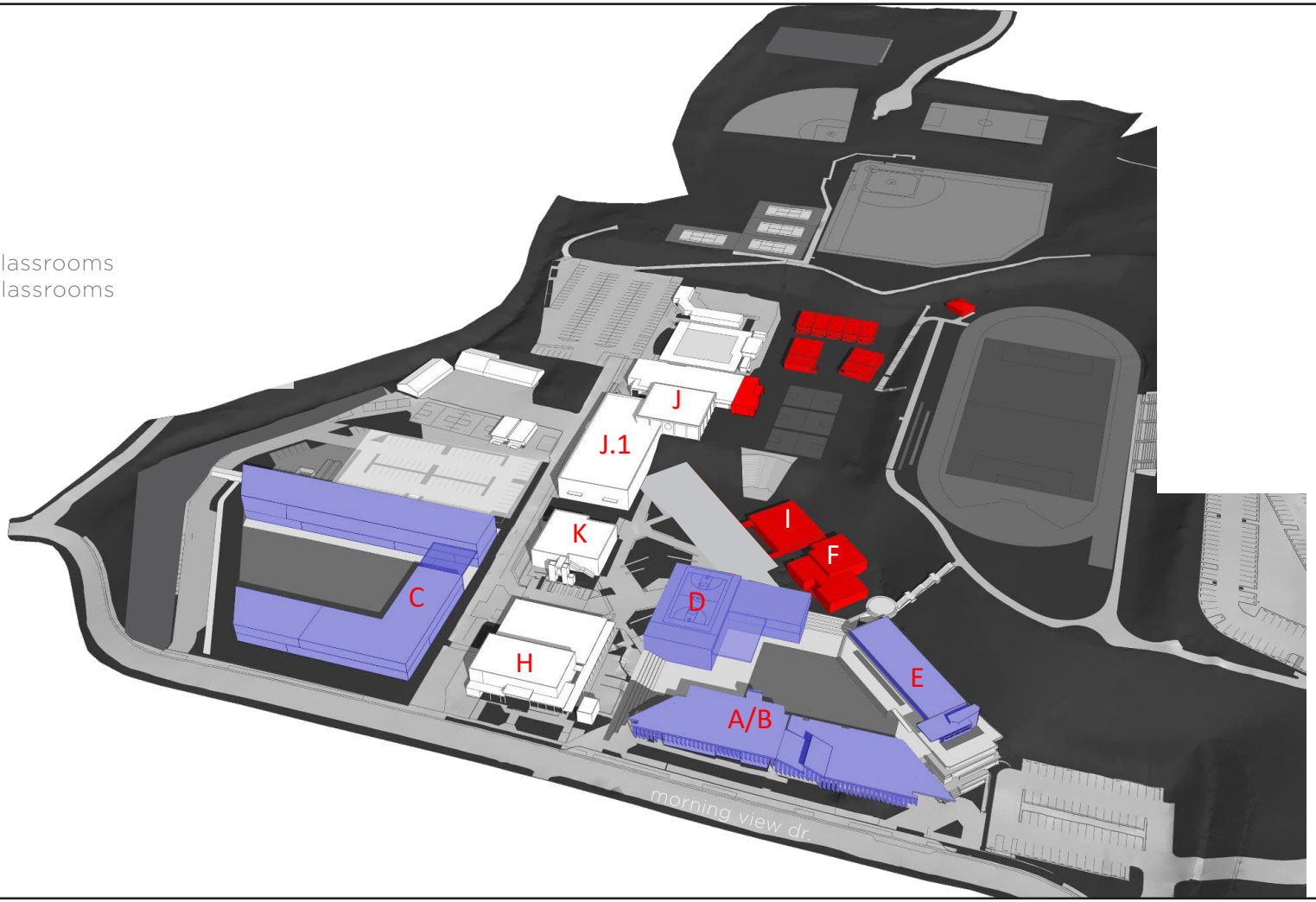
Figure 12a - Phase 3 Proposed Demolition

- Portables
- MS/HS STEM classrooms
- MS/HS VAPA classrooms
- Tennis courts
- Amphitheater
- Field house



Source: LPA, 2020

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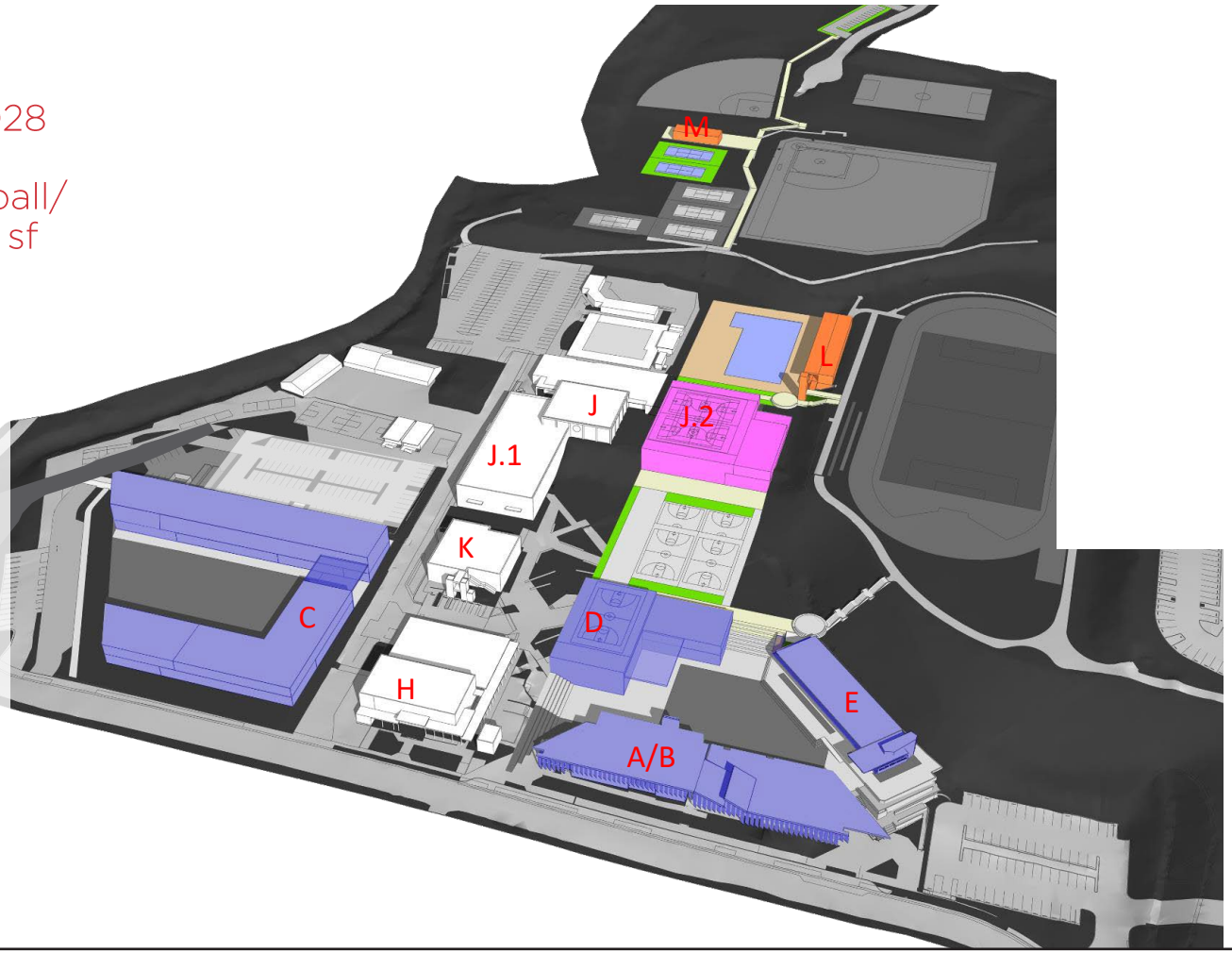
Figure 12b - Phase 3 Proposed Construction Plan

construction 9/2026- 9/2028
new bldg. area:
Shared PE- Baseball/ Softball/ Aquatics/ Stadium= 11,304 sf
HS PE= 32,452 sf

- HS gym- bldg. J.2
  - Team rooms
  - 4 cross-courts
- Baseball field house- bldg. M
- Track + field house- bldg. L
- Aquatic Center- bldg. L
  - Pool lockers
  - Community lockers
  - Coach offices
  - Covered spectator stands

Site
- Pool
- MS Hardcourts
- Pedestrian trail to stadium
- Track seating + press box
- New tennis courts

(38) teaching stations (until HS bldg. is complete)



Source: LPA, 2019

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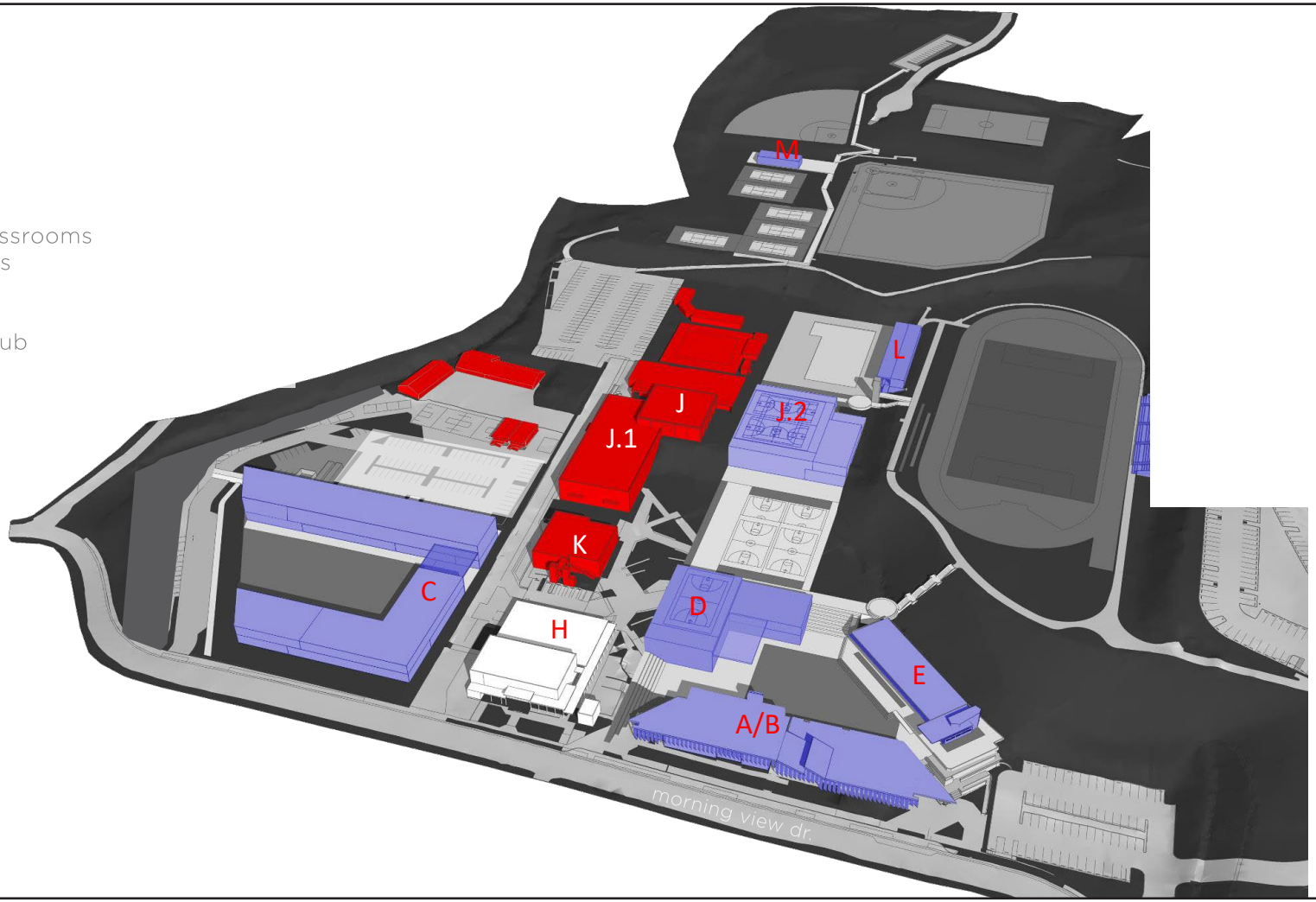
Figure 13a - Phase 4a Proposed Demolition

- HS General classrooms
- All gymnasiums
- Pool
- Pool building
- Boys & Girls Club
- Bus Barn



Source: LPA, 2020

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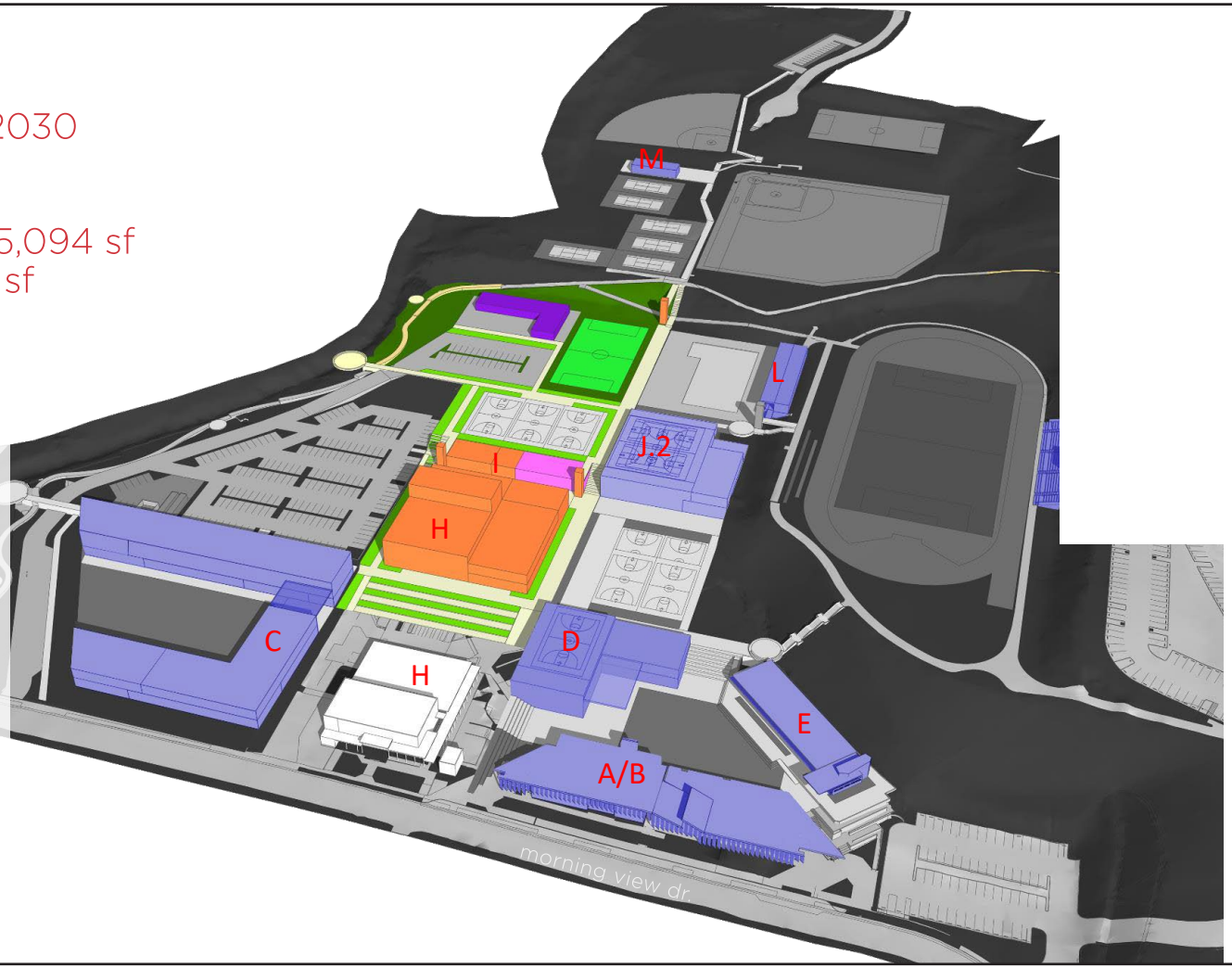
Figure 13b - Phase 4a Proposed Construction Plan

construction 9/2028- 9/2030
new bldg. area:
shared vapa= 30,094 sf
shared sp ed/ wellness= 5,094 sf
hs dance/weight = 4,256 sf
relocate boys/ girls club

- Theater- bldg. H
- VAPA classrooms- bldg. H
- Special education classrooms- bldg. I
- HS PE classrooms- bldg. H
- Wellness Center- bldg.I
- Boys & Girls Club

Site
- Soccer field
- HS Hard courts
- Drop-off + parking
- Pedestrian connection to upper fields



Source: LPA, 2019

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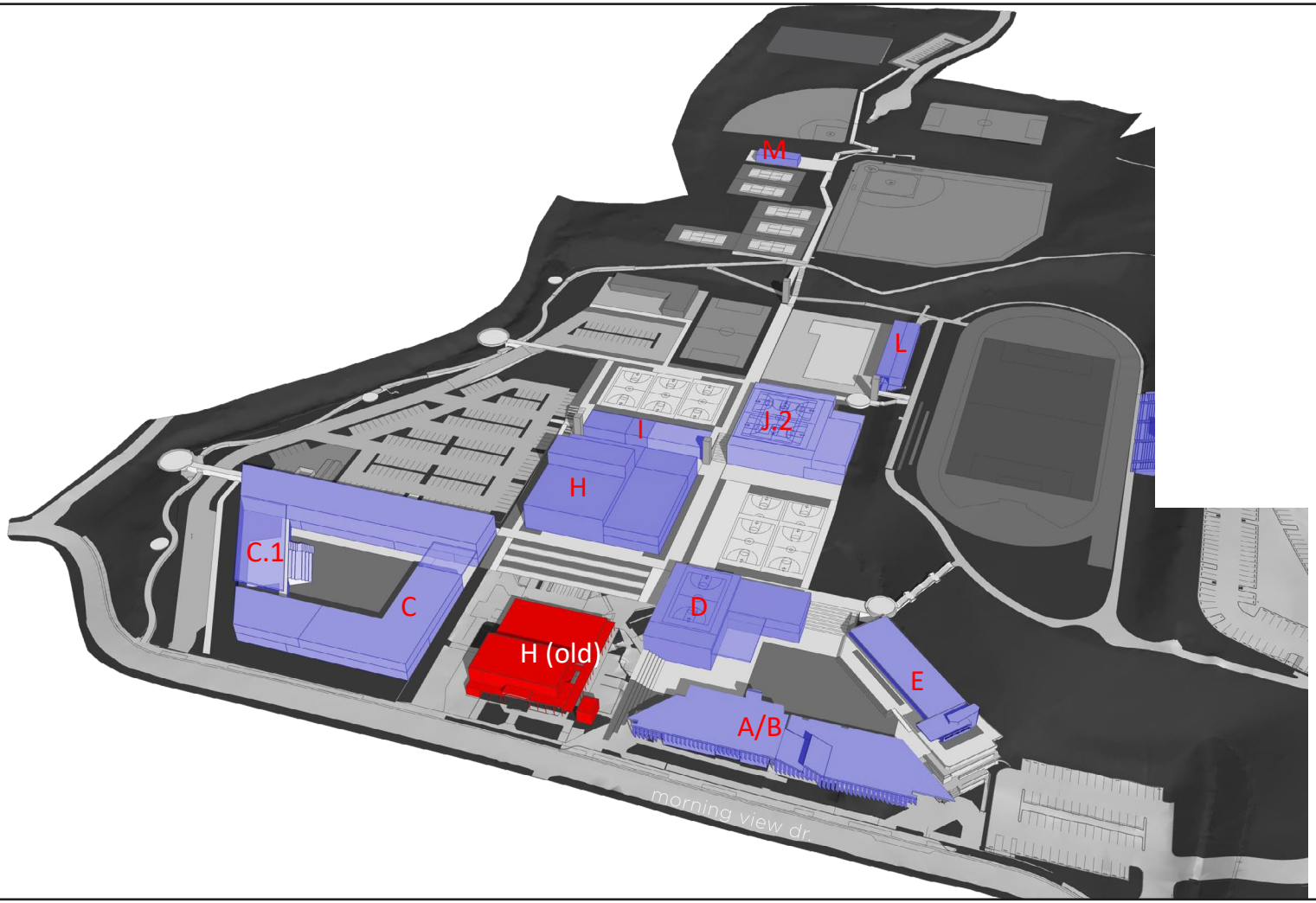
Figure 14a - Phase 4b Proposed Demolition

- Theater



Source: LPA, 2020

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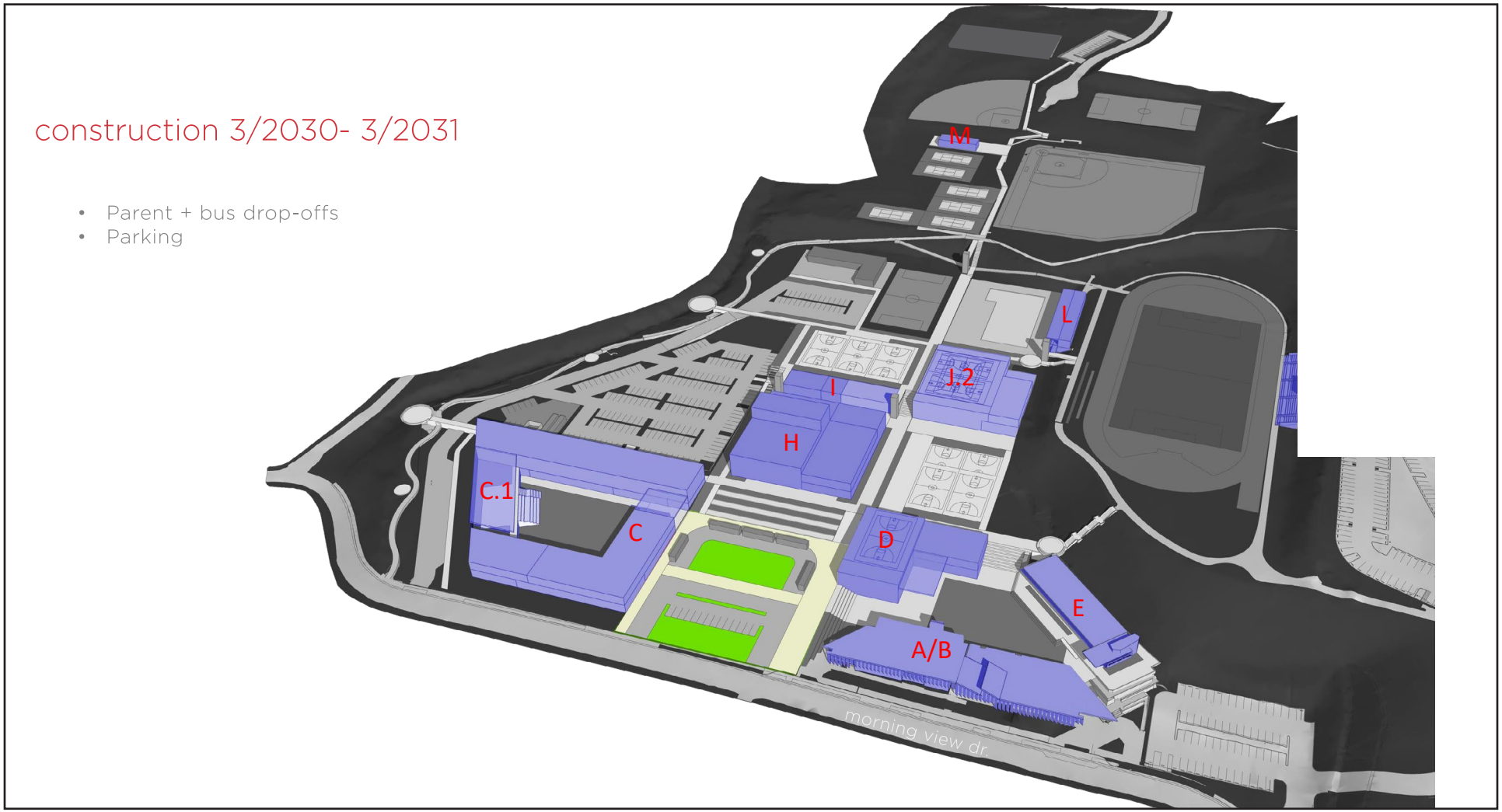
Figure 14b - Phase 4b Proposed Construction Plan



Source: LPA, 2020

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Malibu Middle and High School Campus Specific Plan

2. Lead Agency Name and Address:
   Santa Monica-Malibu Unified School District
   1651 16th Street
   Santa Monica , CA 90404

3. Contact Person and Phone Number:
   Carey Upton, Chief Operations Officer
   310.450.8338

4. **Project Location:** The Project Site includes the entirety of the SMMUSD property: the existing Malibu Equestrian Park in the eastern portion of the property, the existing MMHS campus in the center, and the former JCES campus in the western portion. MMHS is at 30215 Morning View Drive (Assessor's Parcel Map Numbers 4469-017-900, 4469-018-900, 4469-018-901, 4469-018-902, 4469-018-903, 4459-018-904, 4469-019-900, 4469-019-901, 4469-019-902 [9 parcels]), in the City of Malibu, Los Angeles County, California. The Malibu Middle and High School Campus Specific Plan (Proposed Project) would be developed on the existing MMHS campus and the former JCES campus. The MMHS campus is set amid rolling hills, and its buildings and athletic fields are terraced into its hillside setting. The MMHS campus is approximately 0.25-mile northeast of both the Pacific Coast Highway (PCH) and Zuma Beach, with Merritt Drive to the west, Via Cabrillo Street to the east, and Morning View Drive to the south. Single-family homes border the Project Site to the north.

5. **Project Sponsor's Name and Address:**
   Santa Monica-Malibu Unified School District
   1651 16th Street
   Santa Monica , CA 90404

6. **General Plan Designation:** Institutional

7. **Zoning:** Institutional

8. **Description of Project:** The Proposed Project would redevelop the existing MMHS and former JCES campus to create three distinct areas: Middle School Core, High School Core, and shared facilities. Implementation of the Proposed Project would result in demolition of all 11 buildings on the former JCES campus and 7 buildings on the MMHS campus, totaling 147,556 square feet of demolition. The newly constructed Building E and Buildings A/B (under construction) would remain, with all other structures removed. No changes to the existing football/track, baseball, or softball fields would occur with the exception of the development of new field houses and additional parking adjacent to the softball

field. The Proposed Project would not impact the Malibu Equestrian Park. The Proposed Project would result in 32 classrooms and 8 labs and a total of 190,967 square feet of building spaces, providing the MMHS campus with a total of 47 classrooms and 12 labs and a total of 240,650 square feet of building spaces.

Additionally, the Malibu Middle and High School Campus Specific Plan is proposed to regulate the project. Adopting the Specific Plan is a discretionary, legislative, decision that must be made by the City of Malibu's City Council. In order to meet the District's Education Specifications, the California Interscholastic Federation, the National Federation of State High School Association, the District is proposing that Buildings D, C, H and J exceed the LIP's 28-foot height requirements. Additionally, the labs located in Building C would require fume hoods that would exceed the height restrictions for rooftop mounted equipment. Development standards established under the Specific Plan include the building specifications such as heights, setbacks, design standards for landscaping and signs.

9. **Surrounding Land Uses and Setting:** Surrounding land uses in the general vicinity of the Project Site include properties that are zoned Rural Residential (RR). These parcels are primarily developed with homes on lots that range between one to two acres in size. Single-family homes are to the north, west, and south of the Project Site. Immediately adjacent to the Project Site to the east is the Malibu Equestrian Park, which leases the District-owned property. The entirety of the District-owned property—including the former JCES, the MMHS campus, and the Equestrian Park—is zoned for institutional uses. To the south, across Morning View Drive, is the Malibu United Methodist Church and Nursery School. Zuma Beach and PCH are approximately 1,000 feet and 1,500 feet southwest of the Project Site, respectively.

10. **Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):**

- Regional Agencies
  - Los Angeles RWQCB (Issuance of waste discharge requirements)
  - South Coast Air Quality Management District (SCAQMD) (Rule 1166 VOC Contaminated Soil Mitigation Plan)
- County of Los Angeles
  - Fire Department (Approval of Site Plan for Emergency Access)
  - Los Angeles Department of Public Works (Water District 29)
- City of Malibu
  - Public Works/Engineering (for grading permit)
  - Planning Commission (for Coastal Development Permit)

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

    Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the

California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The Proposed Project would comply with tribal consultation requirements pursuant to Assembly Bill 52 (AB 52). The Santa Ynez Band of Chumash Indians, Gabrielino/Tongva San Gabriel Band of Mission Indians, and the Torres Martinez Desert Cahuilla Indians are on the SMMUSD's notification list pursuant to AB 52. The District provided notification letters to these tribes on May 15, 2020 and as of the time of publication of this Initial Study, no response has been received.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture / Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☒ Hydrology/Water Quality	☒ Land Use / Planning	☐ Mineral Resources
☒ Noise	☐ Population / Housing	☒ Public Services
☒ Recreation	☒ Transportation	☐ Tribal Cultural Resources
☒ Utilities / Service Systems	☒ Wildfire	☒ Mandatory Findings of Significance

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Carey Upton

Digitally signed by Carey Upton
DN: cn=Carey Upton, o=Santa Monica-Malibu Unifoed School District, ou=Chief Operations Officer, email=cupton@smmusd.org, c=US
Date: 2020.08.13 13:45:25 -07'00'

Signature *Date*

Carey Upton, Chief Operations Officer

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. CEQA Guidelines section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) **Earlier Analyses Used.** Identify and state where they are available for review.

   b) I**mpacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) **Mitigation Measures.** For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

2. Environmental Checklist

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	X			
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	X			
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	X			
c) Expose sensitive receptors to substantial pollutant concentrations?	X			
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	X			
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	X			
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X			
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	X			
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	X			
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	X			
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	X			
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	X			
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	X			
VII. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?	X			
b) Result in substantial soil erosion or the loss of topsoil?	X			
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	X			
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	X			
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	X			
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X			
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X			
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	X			
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	X			

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	X			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	X			
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	X			
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	X			
iv) impede or redirect flood flows?	X			
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	X			
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	X			

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			
b) Generation of excessive groundborne vibration or groundborne noise levels?	X			
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	X			
Police protection?	X			
Schools?				X
Parks?				X
Other public facilities?				X
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X			
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	X			
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	X			
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	X			
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	X			
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	X			

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	X			
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	X			
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	X			
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X			
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	X			
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	X			

3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

Except as provided in Public Resources Code section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. Scenic vistas are panoramic views of features such as mountains, forests, the ocean, or urban skylines. The Project Site is fully developed with an existing middle and high school campus, athletic fields, on-site parking, and ancillary educational uses. The Project Site does not contain unique scenic visual features that would distinguish it from surrounding areas, nor is it in a designated scenic vista identified in the City of Malibu General Plan Conservation Element (Malibu 1995). The nearest scenic area in the vicinity is the Santa Monica Mountains National Recreation Area, approximately one mile north of the Project Site, which include portions of the Zuma Ridge Trail and the Coastal Slope Trail (Malibu 2001). There are also local trails along Morning View Drive and the Malibu Equestrian Park within close proximity to the Project Site (Malibu 2016). Since project elements would be visible from the surrounding neighborhood, implementation of the Proposed Project would potentially result in the obstruction or degradation of existing scenic views. Therefore, the Proposed Project's impacts on scenic vistas are potentially significant, and this issue will be further analyzed in the EIR.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Potentially Significant Impact. The closest designated state scenic highway is Route 27 (designated in March 2017), approximately 15 east miles from the Project Site. The nearest eligible designated state scenic highway is Pacific Coast Highway (PCH), located 0.25 mile south of the Project Site (Caltrans 2019). Although the Project Site is only minimally visible from PCH, the Proposed Project would result in buildings that are larger in size, scale, and mass than existing buildings. Therefore, the Proposed Project would potentially damage scenic resources within a state scenic highway. Impacts would be potentially significant, and this issue will be further evaluated in the EIR.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly

accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. The Project Site is not in an area that qualifies as an "urbanized area" and is surrounded by rural residential and recreational uses.[1] The Proposed Project would involve the demolition of all buildings on the Project Site with the exceptions of Buildings A/B and E. Implementation of the Proposed Project would allow for redevelopment of existing uses, resulting in new development that differs in scale, mass, density, and character. Therefore, the Proposed Project would potentially result in the degradation of the visual character and quality of public views of the Project Site and its surroundings. Impacts would be potentially significant, and this issue will be further evaluated in the EIR.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. The Project Site is a developed school campus. Existing sources of light include field lights, pool lighting, building and security lights, and parking lot lights. Implementation of the Proposed Project would result in a reconfiguration of existing land uses and new development with associated lighting security lighting. Light levels from the Proposed Project could exceed the City of Malibu's Dark Sky Ordinance standards. Therefore, new sources of light and glare could result in adverse impacts to day- or nighttime views. Impacts would be potentially significant, and this issue will be further evaluated in the EIR.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

[1] See PRC § 21071/CEQA Guidelines § 15191(m)(1). For an incorporated city "Urbanized area" means the city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. City of Malibu has a population of about 12,777 (U.S. Census Bureau. QuickFacts. Population estimates, July 1, 2019).

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact for (a) through (e). The California Department of Conservation manages the Farmland Mapping and Monitoring Program, which identifies and maps significant farmland. Farmland is classified using a system of five categories—Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service. The California Department of Conservation manages an interactive website, the California Important Farmland Finder. This website program identifies the Project Site as "Urban and Built-Up Land," and it is therefore not considered agriculturally important land (DOC 2016).

The Project Site is developed with existing educational uses, and no farmland exists on the Project Site. The Project Site is not subject to a Williamson Act contract, and the Project Site is zoned as institutional use in the Land Use and Zoning section of the City of Malibu's LCP (Malibu 2001). The Project Site contains no forest land or timber resources and is not zoned for forestland protection or timber production. Therefore, the Proposed Project would result in no impact to agriculture or forest resources. No further discussion in the EIR is necessary.

3.3 AIR QUALITY

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

a) Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is in the South Coast Air Basin (SoCAB), which is under the jurisdiction of the South Coast Air Quality Management District (AQMD). Along with the California Air Resources Board, the Southern California Association of Governments (SCAG), and the US Environmental Protection Agency (EPA), the South Coast AQMD is the air pollution control agency primarily responsible for preparing the air quality management plan (AQMP) for the region in coordination. The AQMP is a

comprehensive air pollution control program for progressing towards and attaining the established state and federal ambient air quality standards (AAQS). The final 2016 AQMP, adopted by the South Coast AQMD governing board on March 3, 2017, includes pollutant control strategies based on the latest scientific and technical information and planning assumptions from SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, SCAG's latest growth forecasts, and updated emission inventory methodologies for various source categories (SCAQMD 2017).

A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. In addition, it provides the local agency with ongoing information as to whether they are contributing to clean air goals in the AQMP. The Proposed Project involves the redevelopment of the former JCES and MMHS sites, which may result in an increase in air pollutant emissions during Project-related construction and operational phases. An air quality assessment will be prepared to analyze the Project's potential air quality impacts and consistency with the AQMP. This impact will be further evaluated in the EIR, and applicable mitigation measures will be identified.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. The SoCAB is designated nonattainment for ozone (O_3) and fine particulate matter ($PM_{2.5}$) under the California and National AAQS, nonattainment for particulate matter (PM_{10}) under the California AAQS, and nonattainment for lead (Pb) under the National AAQS (CARB 2018). Any project that produces a significant project-level regional air quality impact in a nonattainment area adds to the cumulative impact. Due to the extent of the SoCAB area and the large number of cumulative project emissions, a project would be cumulatively significant when project-related emissions exceed the SCAQMD regional significance emissions thresholds (SCAQMD 1993). In addition, an increase in emissions could result during long-term operation of proposed facilities and cumulatively contribute to the nonattainment designations. The EIR will evaluate the Proposed Project's potential to result in a cumulatively considerable net increase in criteria pollutants. Mitigation measures will be incorporated as needed.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. An air quality analysis is required to determine if the potential mobile and stationary air emissions associated with implementation of the Proposed Project could result in exposure of off-site sensitive receptors to significant concentrations of air pollutants. An air quality analysis will be prepared to address these potential impacts to sensitive receptors. Further evaluation in the EIR is required to determine the level of significance and to identify mitigation measures (if necessary) that reduce impacts to below a level of significance, if required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Proposed Project does not include any of these uses. Proposed Project uses, such as kitchen or waste management activities, could generate odors; however, these types of uses are typical of school facilities and would be subject to established SMMUSD waste management practices, which would minimize and control odors. Furthermore, construction activities could also generate odors from construction equipment, such as diesel exhaust, and from volatile organic compounds from architectural coatings and paving activities. However, these odors would be temporary and confined to the immediate vicinity of the construction equipment. They are not expected to affect a substantial number of people. Therefore, impacts related to objectionable operational and construction-related odors would be less than significant. This topic will not be evaluated in the EIR, and applicable mitigation measures will be identified.

3.4 BIOLOGICAL RESOURCES

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact. Sensitive biological resources are habitats or species that have been recognized by federal, state, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. Sensitive animal and plant species have been identified in the Point Dume region, including species identified in the California Department of Fish and Wildlife's California Natural Diversity Database (CNDDB). This database lists special status wildlife species that have historically occurred within regions of California, including the City of Malibu. The CNDDB indicates that 22 rare plant species and 7 sensitive, federal- and state-listed wildlife species have been identified in the Point Dume region (CDFW 2020). A biological resource assessment will be conducted to identify sensitive species on or near the Project Site. Therefore, implementation of the Proposed Project would potentially have a substantial adverse effect on

sensitive biological resources. Impacts would be potentially significant, and this issue will be further evaluated in the EIR and applicable mitigation measures will be identified.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact. Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, are known to provide habitat for sensitive animal or plant species or are known to be important wildlife corridors. According to the previous EIR conducted for the Malibu Middle and High School Campus Improvements Project (SCH No. 2008091059) and Malibu Middle and High School Biological Assessment conducted in 2009, there is a stream approximately 400 feet northwest of the Project Site (Atkins 2011; GLA 2009). Therefore, implementation of the Proposed Project would potentially have a substantial adverse effect on riparian habitat and other sensitive natural community. Impacts would be potentially significant, and this issue will be further evaluated in the EIR, and applicable mitigation measures will be identified.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to the U.S. Fish and Wildlife Service's National Wetlands Inventory, there is a freshwater forested/shrub wetland along the western boundary of the Project Site and a riverine habitat to the northwest of the Project Site (USFWS 2018; Atkins 2011; GLA 2009). Therefore, implementation of the Proposed Project would potentially have a substantial adverse effect on state or federally protected wetlands. Impacts would be potentially significant, and this issue will be further evaluated in the EIR, and applicable mitigation measures will be identified.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact. Wildlife corridors link areas of natural habitats separated by rugged terrain, changes in vegetation, or human disturbance. Corridors accommodate animal movement to enhance genetic interchange and re-colonization of the species and provide buffers for species populations to use in response to environmental changes and natural disasters. Large corridors (often referred to as habitat or landscape linkages) can provide both transitory and resident habitat for a variety of species. The former JCES and MMHS campuses are landscaped with typical ornamental groundcovers, shrubs, and trees while the athletic field is vegetated with turf grasses and ornamental species. The slopes surrounding the athletic field are vegetated with ruderal species and disturbed Venturan coastal sage scrub. Open space areas to the north and east of the Project Site support disturbed Venturan coastal sage scrub, Venturan coastal sage scrub, ruderal vegetation, and

disturbed/developed land (Atkins 2011; GLA 2009). The Project Site is surrounded by rural development and no major drainages, canyon bottoms, ridgetops, rivers, creeks, or areas that provide substantial movement corridors or migratory pathways occur within the Project Site. No areas that would be considered nursery sites, which generally include some types of wetlands and avian rookeries, are found within the Project Site. The stream, located northwest to the Project site, is a riparian habitat; and its potential to provide suitable nursery habitat or serve as a migratory corridor will be evaluated in the EIR.

Migrating birds use trees as nesting or nursery sites. Project construction would require the removal of existing trees on-site, which could potentially result in direct and indirect impacts to migratory birds. A tree count and mapping would be conducted to show the number of trees would be removed under the Proposed Project. Therefore, Project implementation could interfere substantially with the movement of a native resident or migratory fish or wildlife species. Impacts would be potentially significant, and this issue will be further evaluated in the EIR, and applicable mitigation measures will be identified.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Potentially Significant Impact. The City of Malibu's LUP contains policies related to biological resources and is intended to achieve the goals and objectives of the California Coastal Act. Specifically, the City of Malibu Native Tree Protection Ordinance "applies to those areas containing one or more native oak (*Quercus* species), California Walnut (*Juglans californica*), Western Sycamore (*Platanus racemosa*), Alder (*Alnus rhombifolia*), or Toyon (*Heteromeles arbutifolia*) tree, that has at least one trunk measuring six inches or more in diameter, or a combination of any two trunks measuring a total of eight inches or more in diameter, measured at four and one-half feet above natural grade" (Malibu 2002). According to the tree survey conducted for the Project Site in 2009, a total of 138 native and nonnative trees were recorded within the Project Site. Native trees in the Project Site include California Walnut and Western Sycamore (Atkins 2011; Carlberg 2009). A biological resource assessment will be conducted to analyze the potential impacts to protected trees. Therefore, impacts would be potentially significant, and this issue will be further evaluated in the EIR, and applicable mitigation measures will be identified.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Potentially Significant Impact. Aside from the Local Coastal Plan, there are no other adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans that govern the Project Site (CDFW 2019). The City of Malibu's Land Use Plan (LUP) ESHA Map shows an unnamed ESHA stream on the northwest boundary of the Project Site approximately 400 feet northwest of campus development. The unnamed stream consists of an underground pipe that flows under the school property then daylights into a natural streambed to the south of the school property. Therefore, construction and operation of the Proposed Project could impact the ESHA, and this issue will be further discussed in the EIR, and applicable mitigation measures will be identified.

3.5 CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. CEQA Guidelines section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important in our past;

iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

iv) Has yielded, or may be likely to yield, information important in prehistory or history.

According to City of Malibu General Plan, there are no historical landmarks in the Project Site (Malibu 1995). Furthermore, the record search conducted at SCCIC in 2008 (SCCIC file #8739.5767 and #9087.6045) also did not identified historical resources within the Project Site. The search included a review of the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), the California Inventory of Historic Resources, California Historic Landmarks, California Points of Historic Interest, City of Los Angeles Historic-Cultural monuments, records of previously recorded cultural resources, and relevant technical reports. The previous environmental documents conducted for the MMHS Campus Improvement Project concluded that the Project Site does not meet the criteria for listing on the California Register of Historical Resources (CRHR), an no impact to historical resources would occur from the modification of the Project Site (Atkins 2011). However, there is potential for historic resources to be located in the Project Site, as there are buildings that would be demolished that were not evaluated as part of the 2011 EIR. Therefore, local historic research will be conducted to address the historic land use and developments within the Project Site. The EIR will evaluate the Proposed Project's impacts on any potentially historic resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Potentially Significant Impact. As discussed above, no archaeological or historic-era resources were identified within the Project Site. However, the Proposed Project is located in an area that is known for archeological resources and nine archaeological sites were identified within a half-mile radius (Atkins 2011). Construction of the Proposed Project may cause the disturbance of archaeological resources. Excavation to depths greater than current foundations has the potential to encounter unknown archaeological resources.

Therefore, impacts to archaeological resources would be potentially significant and will be further addressed in the EIR.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. Health and Safety Code section 7050.5; CEQA Guidelines section 15064.5; and Public Resources Code section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, Health and Safety Code section 7050.5, requires that if human remains are discovered on a project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Although soil-disturbing activities associated with the construction of the Proposed Project could result in the discovery of human remains, compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. Therefore, impacts would be less than significant, and this impact will not be further analyzed in the EIR.

3.6 ENERGY

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. Following is a discussion of the potential impacts related to the consumption of energy sources resulting from the construction and operational phases of development that would be accommodated by the Proposed Project.

Construction

Construction of the Proposed Project would require energy use to power the construction equipment. The energy use would vary during different phases of construction—the majority of construction equipment during demolition and grading would be gas or diesel powered. The later construction phases could require electricity-powered equipment for interior construction and architectural coatings. Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. Impacts related to energy use during construction will be addressed further in the EIR, and applicable mitigation measures will be identified.

Operation

The Project Site is currently developed with institutional uses. The existing facilities onsite consumes electricity for various needs, including but not limited to, heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; and use of on-site equipment and appliances. The Proposed Project would involve the replacement of older buildings with new buildings that would comply with the 2019 Building Energy Efficiency Standards. Under the 2019 standards, buildings would be more energy efficient compared to the 2016 standards (CEC 2018).

Southern California Edison and Southern California Gas Company provide electrical and natural gas energy services, respectively, to Malibu and the Project Site. The Proposed Project would result in 32 classrooms and 8 labs and a total of 190,967 square feet of building spaces, providing the MMHS campus with a total of 47 classrooms and 12 labs and a total of 240,650 square feet of building spaces. Therefore, increased electrical, gas, and transportation energy demands would result from Project implementation. The EIR will provide anticipated increase in demands and analyze potential impacts to existing energy services, and applicable mitigation measures will be identified.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. The Proposed Project would redevelop the Project Site through demolishing 147,556 square feet of existing facilities and adding 190,967 square feet of new development. The new buildings would be constructed to meet the 2019 California Green Building Standards and Energy Efficiency Standards. Additionally, the District has an adopted Districtwide Plan for Sustainability that includes energy-related goals and action. Consistency with the energy-related goals and actions of the Districtwide Plan for Sustainability will be further evaluated in the EIR, and applicable mitigation measures will be identified.

3.7 GEOLOGY AND SOILS

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Surface rupture is the most easily avoided seismic hazard. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface. The main purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent construction of buildings used for human occupancy on the surface of active faults, in order to minimize the hazard of surface rupture of a fault to

people and habitable buildings. Before cities and counties can permit development within Alquist-Priolo Earthquake Fault Zones, geologic investigations are required to show that the proposed development site is not threatened by surface rupture from future earthquakes.

No active earthquake fault—that is, a fault that has ruptured during Holocene time (the last 11,700 years)—or Alquist-Priolo Earthquake Fault Zone is mapped on or near the Project Site on the California Geological Survey Data Viewer (CGS 2020). The nearest Alquist-Priolo Earthquake Fault Zone to the Project Site is the Anacapa (Dume)–Santa Monica fault zone, which runs in an east-west direction and is approximately three miles to the east of the Project Site. The Anacapa (Dume)–Santa Monica fault zone is classified as a Holocene fault (CGS 2020). Therefore, impacts from rupture of a known earthquake fault would be less than significant. This topic will not be further evaluated in the EIR.

ii) Strong seismic ground shaking?

Potentially Significant Impact. There are several known active faults in the region, including the Anacapa (Dume)–Santa Monica Fault system and the Malibu Coast Fault. Therefore, any major earthquake along these major active faults will likely cause seismic ground shaking at the Project Site.

Project-related structures and buildings are required to be designed and built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2], adopted by reference as Chapter 15.04, Building Code Adopted, in the City's Municipal Code), which contains provisions for enhanced earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the probable strength of ground motion. The Proposed Project will be designed to meet the exacting seismic requirements of the Field Act, reviewed, and approved by DSA, and construction will be monitored by a DSA approved inspector. Compliance with the legal requirements for school construction, the Proposed Project would not cause a potentially significant seismic impact. Accordingly, this topic will not be further identified in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to soils that lose their load-supporting capability when strongly shaken. In general, soils that are susceptible to liquefaction are loose, saturated granular soils having low content of fine-grained particles (such as clays) and under low confining pressures. Liquefaction can make soils highly mobile, leading to lateral movement, sliding, consolidation, and settlement of loose sediments; sand boils; and other damaging deformations. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

The Project Site is not in a liquefaction zone identified in the State of California Seismic Hazard Zones Map (Point Dume Quadrangle) (CGS 2002). Therefore, impacts would be less than significant. This topic will not be evaluated in the EIR.

iv) Landslides?

Potentially Significant Impact. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The Project Site is situated on the southern flanks of the western

portion of the Santa Monica Mountains. Maximum topographic relief on-site is approximately 94 feet, with elevations ranging from 86 to 180 feet above mean sea level. The campus consists of several near-level pad areas with generally ascending slopes to the north and descending slopes to the Pacific Coast Highway to the south. Therefore, the Project Site may be prone to landslides. This topic will be studied further in the EIR, and mitigation measures will be identified as necessary.

b) Result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact. Erosion is the movement of rock and soil from place to place. Erosion occurs naturally by agents such as wind and flowing water; however, grading and construction activities can greatly increase erosion if effective erosion control measures are not used. Common means of soil erosion from construction sites include water, wind, and being tracked off-site by vehicles. About half of the Project Site, including all areas with current development, is situated on slopes between 0 and 20 percent, at elevations of a minimum of 80 feet above mean sea level. Construction of the Proposed Project would result in ground surface disturbance during excavation, grading, and trenching that would create the potential for soil erosion. Therefore, impacts to soil erosion would be potentially significant and will be further analyzed in the EIR, and applicable mitigation measures will be identified.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Potentially Significant Impact. See responses to Sections 3.7(a)(iii) and (iv), above. Impacts related to lateral spreading, subsidence, and collapse will be evaluated in the EIR.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking can shift, crack, or break structures built on such soils. According to Expansion Index (EI) testing performed by Leighton Inc. soils on the Project Site are highly expansive, with an EI greater than 20 (Atkins 2011). Mitigation measures were identified in the previous environmental documents to reduce impacts from expansive soils. Therefore, there is a potential for expansive soils to exist within the confines of the Project Site. This issue will be further evaluated in the EIR and mitigation measures will be identified as necessary.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Potentially Significant Impact. The Project Site is currently served by a septic tank system, and the Proposed Project would require an update to the existing septic system. A geotechnical report will be prepared to analyze the adequacy the Project Site to support an upgraded septic system. Impacts would be potentially significant, and this issue will be further evaluated in the EIR, and applicable mitigation measures will be identified.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The Project Site is located in an area with high paleontological sensitivity (the Monterey Formation geologic unit), and excavation into undisturbed sediments of the Monterey Formation may have the potential to indirectly destroy undiscovered unique paleontological resources during construction (Petra Paleontology 1999). The paleontology records checks performed by the Natural History Museum of Los Angeles County for the MMHS Improvements Project concluded that there are no vertebrate fossil localities within the Project Site, but there are localities nearby from the same sedimentary units that underlain the Project Site (NHM 2008). Given the disturbed condition of the Project Site and its surroundings, the potential for implementation of the Proposed Project to impact an unidentified paleontological resource is considered low. However, a paleontological records search will be conducted as part of the cultural resource assessment for the Project Site. This impact is potentially significant and will be analyzed in the EIR; mitigation measures will be identified as necessary.

3.8 GREENHOUSE GAS EMISSIONS

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Global climate change is not confined to a particular project site and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly. The issue of global climate change is thus, by definition, only a cumulative environmental impact. Through its governor and legislature, the State of California has established a comprehensive framework to substantially reduce GHG emissions over the next 40 years and beyond. Reduction measures will occur primarily through the implementation of Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and Senate Bill 375 (SB 375), which address GHG emissions on a statewide, cumulative basis.

The Proposed Project could potentially generate GHG emissions that could significantly impact the environment. The EIR will evaluate the potential for the Proposed Project to generate a substantial increase in GHG emissions, and mitigation measures will be incorporated as necessary.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The California Air Resources Board's (CARB) Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target, established by AB 32, of 1990 emission levels by year 2020 (CARB 2008). In addition, SB 375, the Sustainable Communities and Climate Protection Act of 2008, was adopted by the legislature to reduce per capita vehicle miles traveled and associated GHG emissions from passenger vehicles. SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016) identifies the per capita GHG reduction goals for the SCAG region. SCAG recently released the 2020-2045 RTP/SCS (Draft Connect SoCal Plan) on November 7, 2019,

and, once finalized, the 2020-2045 RTP/SCS will replace the 2016-2040 RTP/SCS. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SCAG's RTP/SCS. Furthermore, the City of Malibu is also currently preparing the Community Resilience and Adaptation Plan. Construction and operation of the Proposed Project have the potential to conflict with GHG reduction strategies and goals of CARB's Scoping Plan and SCAG's 2016 RTP/SCS. Therefore, impacts are potentially significant. The EIR will evaluate consistency with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions, and mitigation measures will be identified as necessary.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Potentially Significant Impact. The term "hazardous material" is defined in different ways by different regulatory programs. For purposes of this environmental document, the definition of "hazardous material" is the same as Health and Safety Code section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as Health and Safety Code section 25117, and California Code of Regulations, Title 22, section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Construction

Construction activities of the Proposed Project would involve the use of larger amounts of hazardous materials than would Project operation. Construction activities would include the use of materials such as fuels, lubricants, and greases in construction equipment and coatings used in construction. However, the materials

used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature. Project construction workers would also be trained in safe handling and hazardous materials use.

The use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the City of Malibu and Los Angeles County Fire Department (LACoFD) would be required through the duration of the Project construction. However, demolition of buildings containing PCBs, asbestos, lead, fluorescent lamps, and other hazardous building materials would be required under the Proposed Project. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during Project construction would be potentially significant and applicable mitigation measures will be identified.

Operation

Operation of the Proposed Project would involve the limited use of hazardous materials for air conditioning, janitorial, maintenance, and repair activities, as well as medical supplies used at the nurse's office. These materials would include commercial cleansers, lubricants, and paints as well as ointments and other medical treatment products typically used to care for minor injuries. However, these types of materials are not considered acutely hazardous and would be used in limited quantities. Additionally, the new science labs could potentially result in the increased use of hazardous materials. All materials will be used, stored, and disposed of in accordance with SMMUSD and applicable state and federal standards, including Title 22 of the California Code of Regulations. The SMMUSD School Safety Plan outlines procedures to protect students and staff from exposure to hazards and hazardous materials. The SMMUSD School Safety Plan contains procedures to address evacuation, clean up, and communication to protect students and staff in case of a hazardous material spill (SMMUSD 2018). Waste materials generated at the new science labs would be disposed of in accordance with regulated practices, which would ensure that hazardous materials are not disposed of in the municipal waste stream or discharged to the campus' sanitary sewage system. All chemical waste would be captured in the labs and disposed of in accordance with all statutory requirements. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur within the Project Site.

The use, storage, transport, and disposal of hazardous materials of the Proposed Project would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, County of Los Angeles Department of Environmental Health, and LACoFD. Compliance with applicable laws and regulations governing the use, storage, transport, and disposal

of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

Therefore, hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during Project operation would not occur. Impacts would be less than significant. This topic will not be further analyzed in the EIR.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. The Project Site is currently built out with institution uses. The previous EIR conducted for the MMHS Campus Improvements Project concluded that PCB and pesticide affected soils would be removed as part of the Proposed Project in accordance with applicable regulations and the synthetic turf material would not exceed California Code of Regulations Title 22 criteria (Atkins 2011). Further analysis is necessary to characterize the existing conditions within the Project Site with respect to past and current activities involving the handling, use, storage, transport, or emission of hazardous materials. Based on the findings of the analysis, it can be determined whether the Proposed Project could involve a risk of release of hazardous materials into the environment. Therefore, potentially significant impacts may occur. This topic will be evaluated in the EIR and mitigation measures will be identified as necessary.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. The Project Site encompasses the MMHS campus and former JCES campus. As discussed in 3.9(a), implementation of the Proposed Project is not anticipated to involve the handling of hazardous materials other than fuels, greases, paints, cleaning and maintenance materials, and chemicals and materials used for educational purposes, such as in science labs, in limited quantities. The use, storage, transport, and disposal of hazardous materials of the Proposed Project would be required to comply with existing federal, local, and state regulations. Therefore, impacts would be less than significant. This topic will not be further analyzed in the EIR.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. Government Code section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. As indicated in the GeoTracker database, the Project Site is an active Waste Discharge Requirements site (SWRCB 2020). The previous environmental documents concluded is identified on the State Leaking Underground Storage Tank (LUST) List, HAZNET, State Hazardous Waste and Substances Sites (CORTESE), and Statewide Environmental Evaluation and Planning System (SWEEPS UST) databases (Atkins 2011). Further evaluation in the EIR is required to identify

whether hazardous materials sites exist on or in the vicinity of the Project Site. Therefore, potentially significant impacts may occur, and mitigation measures will be identified as necessary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest public-use airport to the Project Site is Santa Monica Airport, approximately 23 miles to the southeast of the Project Site. The Project Site is not within the airport's land use plan and is outside of the areas where land uses are regulated respecting air crash hazards and where heights of structures are limited to prevent airspace obstructions for aircraft approaching or departing Santa Monica Airport (Los Angeles County ALUC 2003). Thus, implementation of the Proposed Project would not result in safety hazards related to aircraft operations. This topic will not be discussed in the EIR.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Standardized Emergency Management System (SEMS), California Code of Regulations, Title 19, Division 2, section 2443, requires compliance with the SEMS to "be documented in the areas of planning, training, exercise, and performance." The Malibu Emergency Operation Plan (EOP) was approved by City Council on February 2018. The EOP, which is overseen and managed by the Malibu Disaster Council, meets the SEMS requirements of state law. The EOP addresses the planned response by the City of Malibu to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The purpose of the EOP is to guide the mitigation, response and recovery efforts of the City of Malibu before, during, and after an emergency (Malibu 2018).

For the following reasons, the Proposed Project would not interfere with the implementation of the EOP and any of the daily operations of the City's Emergency Operation Center, LACoFD, or Los Angeles County Sheriff's Department. All construction activities would be required to be performed per the City's and LACoFD's standards and regulations. For example, the Proposed Project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. The Proposed Project would also be required to go through the City's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations, as set forth in the Malibu Municipal Code Chapter 8.12, Fire Code Adopted, to ensure that they do not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Impacts associated with emergency response and evacuation will be further analyzed in the EIR and will include consultation with the Los Angeles County Fire Department and Sherriff's Department regarding firefighting and police resources available near the site and project impacts on emergency services. Impacts on emergency response or evacuation plans would be considered potentially significant and will be further analyzed in the EIR.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Potentially Significant Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. Impacts for wildland fire risks due to implementation of Proposed Project are discussed in detail in Section 3.20, *Wildfire*. The Project Site is located within a Very High Fire Hazard Severity Zone in a Local Responsibility Area (CAL FIRE 2011). Therefore, there is potential for the Proposed Project to expose people or structures to substantial hazards from wildland fires. This topic will be evaluated in the EIR and mitigation measures will be identified as necessary.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. The US Environmental Protection Agency (EPA) establishes national water quality standards. Pursuant to section 402 of the Clean Water Act, the EPA has also established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct stormwater discharges. The Los Angeles Regional Water Quality Control Board (RWQCB) administers the NPDES permitting programs for the City of Malibu and is responsible for developing waste discharge requirements. Los Angeles RWQCB requirements include those requiring preparation and implementation of water quality management plan (WQMP) to control contaminants into storm drain systems, educate the public about stormwater impacts, detect and eliminate illicit discharges, control runoff from construction sites, and implement best management practices (BMPs) and site-specific runoff controls and treatments. Construction and operation of the Proposed Project have the potential to discharge sediment and pollutants to storm drains and receiving waters, thereby leading to a potential water quality impact. However, the City's MS4 Permit and Municipal Code Chapter 13.04 (Stormwater Management and Discharge Control) require reduction of pollutants in stormwater to the maximum extent practical and prohibits the discharge of non-stormwaters unless covered by a separate NPDES permit or Water Board's conditional discharge exemption (13.04.030(A(1) and 13.04.060(D). Compliance with these regulatory requirements would prevent any violations and the impact would be less than significant. This topic will not be further analyzed in the EIR.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Potentially Significant Impact. Although much of the Project Site is already built out with hardscape and impervious surfaces, implementation of the Proposed Project would increase development intensity in the Project Site and may increase impervious surfaces. The EIR will determine whether available water supplies are sufficient to serve the demand generated by the Proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts to groundwater recharge due to implementation of the Proposed Project are potentially significant and will be evaluated in the EIR; mitigation measures will be identified as necessary.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in a substantial erosion or siltation on- or off-site?

Less than Significant Impact. According to the City of Malibu's General Plan, the Trancas Canyon Drainage runs along the northwestern portion of the Project Site (Malibu 1995). Soils in the Project Site could experience erosion during construction, and as required by the Construction General NPDES Permit and City's Municipal Code Section 13.04.110, a Stormwater Pollution Prevention Plan specifying BMPs for minimizing pollution of stormwater with soil and sediment during Project construction would be prepared and implemented to reduce impacts to soil erosion. Although the Proposed Project may result in an increase in impervious surfaces and potentially result in alteration of the existing site's drainage patterns, compliances with the applicable regulatory requirements would prevent impacts from soil erosions. Therefore, impacts would be less than significant and this topic will not be evaluated in the EIR.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact. The Project Site is not in a flood hazard zone, but in an area of undetermined flood hazard (Zone D) (FEMA 2008). Implementation of the Proposed Project may result in an increase in impervious surfaces and alter the existing drainage pattern of the Project Site. Although implementation of the WQMP would reduce runoff from construction and identify BMPs for runoff controls and treatments and the City's Municipal Code section 13.04.120(D) and MS4 Permit would require the Proposed Project design to control runoff volume to the maximum extent feasible. Therefore, impacts related to the increase in the rate or amount of surface runoff would be less than significant. This topic will not be further evaluated in the EIR.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. Increased impervious surfaces may increase the amount of runoff and discharge of sediments and pollutants to stormwater drainage systems. If increased, the additional runoff could exceed the capacity of existing or planned stormwater drainage systems in the Project Site. New stormwater retention basins would be developed to treat runoff from the Proposed Project. This topic will be addressed in the EIR, and mitigation measures will be recommended as needed.

iv) Impede or redirect flood flows?

Potentially Significant Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Maps, the Project Site is in the Zone D flood hazard zone, indicating that the site is in an area of undetermined flood hazard (FEMA 2008). Therefore, impacts would be potentially significant and will be evaluated in the EIR; mitigation measures will be identified as necessary.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Potentially Significant Impact. The following describes potential pollutant impacts related to flood hazard, seiche, and tsunami zones.

Flood Hazard

As noted in Section 3.10(c)(iv), above, the Project Site in an area of undetermined flood hazard. Therefore, impacts related to risk of pollutant release due to inundation from a flooding event would be potentially significant, and this impact will be evaluated in the EIR.

Seiche

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Although there are no large water tanks in the area that could impact the Project Site, there are dams in the region that could create flooding impacts. The Project Site is not in a dam inundation area (DSOD 2020). Therefore, there is no risk of pollutant release due to inundation from a seiche. No impact would occur, and this impact will not be evaluated in the EIR.

Tsunami

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Project Site is approximately 0.3 miles inland from the Pacific Ocean, outside of the tsunami hazard zone identified by the California Governor's Office of Emergency Services (Cal OES 2009). The tsunami zones are identified using a modeling process which accounted for over 50 potential "worst-case" scenarios representing both local and distant tsunami sources. Additionally, the Project Site is not located with a 100-year or 500-year tsunami run-up zone (Malibu 1995). Therefore, there is no possibility of the Project Site being affected by a tsunami; there is no risk of pollutant release due to inundation from a tsunami. No impact would occur, and this impact will not be evaluated in the EIR.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The quality of surface and groundwater is affected by land uses in the watershed and the composition of subsurface geologic materials. Water quality in surface and groundwater bodies is regulated by the State Water Resources Control Board and RWQCB. The City of Malibu is under the jurisdiction of the Los Angeles RWQCB, which is responsible for implementation of state and federal water quality protection guidelines. RWQCB implements the WQMP for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), a master policy document for managing water quality issues in the region. The Project Site is not located within a groundwater basin (DWR 2016) or within a groundwater management plan.

As discussed in the Sections 3.10(a) and (b), above, construction of the Proposed Project has the potential to discharge sediment and pollutants to receiving waters and may obstruct the implementation of the water quality

control plan. The Los Angeles RQWCB would also require a WQMP to be prepared with BMPs for site-specific runoff controls and treatments. Compliance with these regulatory requirements would reduce impacts to a less than significant level. This topic will not be further analyzed in the EIR.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The Proposed Project would not divide an established residential community because it would occur entirely on an existing school campus. Minor off-site improvements may include utility hookups and new crosswalks; these improvements would occur within the public right-of-way and would not physically divide the community. Therefore, no impact would occur. No further discussion in the EIR is necessary.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The Malibu Middle and High School Campus Specific Plan is proposed to regulate the project. In order to meet the District's Education Specifications, the California Interscholastic Federation, the National Federation of State High School Association, the District is proposing that Buildings D, C, H and J exceed the LIP's 28-foot height requirements. Additionally, the labs located in Building C would require fume hoods that would exceed the height restrictions for rooftop mounted equipment. Development standards established under the Specific Plan include the building specifications such as heights, setbacks, design standards for landscaping and signs. The EIR will evaluate the potential impacts that could potentially occur adoption of the proposed Specific Plan, including conflicting with City's LCP and LIP. Impacts would be potentially significant, and this issue will be further evaluated in the EIR.

3.12 MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. No mineral resource recovery sites of statewide or regional significance are located on or in the immediate vicinity of the Project Site. The Project Site is in an area classified as Mineral Resource Zone 3, which is defined as "areas containing mineral deposits the significance of which cannot be evaluated from available data" (DOC 1994). The Project Site is a developed with the former JCES campus and MMHS campus; therefore, implementation of the Proposed Project would not result in the loss of availability of a known mineral resource or resource recovery site. No mineral resource impact would occur. No further discussion in the EIR is necessary.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As discussed above in Response 3.12(a), no mineral resource recovery sites are identified on or in the immediate vicinity of the Project Site. There would be no loss of availability of locally important mineral resources, and no impact would occur. No further discussion in the EIR is necessary.

3.13 NOISE

Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Implementation of the Proposed Project would involve construction, including demolition of existing buildings/facilities, and operational activities that would generate noise levels that may expose sensitive land uses to noise levels in excess of the noise standards. Short-term construction activities could elevate ambient noise levels at nearby noise-sensitive receptors. Under City's Municipal Code Section 8.24.050(g) construction between the hours of 7:00 PM and 7:00 AM on weekdays, before 8:00 AM or after 5:00 PM on Saturday, or at any time on Sundays or holidays are declared to be in violation of the noise ordinance. The City of Malibu General Plan has an established non-transportation-related exterior noise level for Institutional Uses of 65 dBA L_{eq} during daytime hours with a not to be exceeded L_{max} of 85 dBA. The established transportation-related exterior noise level for Institutional uses is 60 dBA L_{dn}.

Long-term operation of new development under the Proposed Project could potentially result in two types of long-term noise impacts. The first may occur if Project-related noise sources substantially increase noise levels in the vicinity of the Project Site. Operational sources will likely include increased roadway traffic as well as stationary sources such as heating, ventilation, and air conditioning units; activities associated with outdoor activities; and educational and recreational uses. The second type of long-term noise impact may occur if the Project Site's noise-sensitive uses are in a high-noise-exposure area. Further evaluation in the EIR is required to determine potential on- and off-site noise impacts, and applicable mitigation measures will be identified.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Following is a discussion of the potential short- and long-term vibration impacts that could result from development that would be accommodated by the Proposed Project.

Short-Term Construction Impacts

Construction operations can generate varying degrees of groundborne vibration, depending on the procedures and equipment used. Operation of construction equipment generate vibrations that spread through the ground and diminish with distance from the source. The effect on buildings and sensitive receptors in the vicinity of the construction site varies depends on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and

perceptible vibrations at moderate levels, to architectural damage at the highest levels. There are nearby buildings/structures and sensitive receptors near the Project Site that could be affected by any construction-related groundborne vibration generated at the Project Site. This impact is potentially significant and will be analyzed in the EIR; mitigation measures will be identified as necessary.

Long-Term Operation Impacts

The Proposed Project involves the redevelopment of an existing school campus. Such land uses would not create operational-related groundborne vibration or noise in the Project area as there are no notable sources of vibrational energy associated with these uses. Therefore, no operational-related groundborne vibration or groundborne noise impact would result from the Proposed Project, and this impact will not be analyzed in the EIR.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest public-use airport to the Project Site is Santa Monica Airport, approximately 23 miles to the southeast. The Project Site is not within the 60 dBA CNEL airport contour (Los Angeles County ALUC 2003). The nearest private airstrip is the Anacapa View Estates Heliport, located approximately one-mile northwest of the Project Site. However, this private heliport is primarily used by the Los Angeles County Fire Department during times of an emergency to better protect the surrounding residents. Therefore, no impact would occur, and this impact will not be addressed in the EIR.

3.14 POPULATION AND HOUSING

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The Project Site is in the established former JCES campus and MMHS campus, and no new roads or extensions of existing roads that could enable development of undeveloped land are proposed. The Proposed Project is intended to serve the existing and anticipated future student population and would not result in the creation of housing or infrastructure that would induce unplanned population growth in the area. The objective of the Proposed Project is to create a middle school and high school campuses that provide separate education spaces for the middle school and high school students as well as shared facilities, improve vehicle and pedestrian circulation, and secure campus access while respecting the natural environmental of West Malibu. Therefore, no impacts involving direct or indirect unplanned increase in population growth would occur as a result of the Proposed Project. This topic will not be further analyzed in the EIR.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is completely within the existing school boundaries. No residences would be displaced or removed as a result of the Proposed Project, and the Proposed Project would have no impact on existing housing because the Proposed Project will accommodate the same enrollment of 1,200, as the existing facilities. Therefore, the Proposed Project would not displace any people or necessitate the construction of any replacement housing. No significant impact would occur. This topic will not be further analyzed in the EIR.

3.15 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Potentially Significant Impact. Fire prevention, fire protection, and emergency medical services in the project area are provided by the LACoFD. The nearest fire station to the Project Site is Fire Station 71 at 28722 Pacific Coast Highway, approximately 2.3 miles from the Project Site. The Proposed Project would be constructed to meet the requirements of the State Fire Marshal. By adhering to the County's fire safety standards, the Proposed Project would not affect LACoFD's performance objectives. The proposed improvements would not result in a change in student capacity, but they would increase community use facilities. Due to the nature of the facilities proposed, there is potential that such conditions would substantially increase the need for fire protection services, alter response times, or adversely affect the department's ability to provide service to the site using existing equipment and personnel. Therefore, a potentially significant impact would occur. Impacts regarding fire protection will be further analyzed in the EIR and include consultation with the LACoFD regarding firefighting resources available near the Project Site and impacts on fire protection.

b) Police protection?

Potentially Significant Impact. Law enforcement services in the area are provided by the Los Angeles County Sheriff's Department. The Malibu/Lost Hills Station is at 27050 Agoura Road in the community of Agoura Hills, approximately 17 miles from the Project Site. The proposed improvements would not result in a change in student capacity, but they increase community use facilities. Due to the nature of the facilities proposed, there is potential that such conditions would substantially increase the need for police protection services, alter response times, or adversely affect the department's ability to provide services to the site using existing equipment and personnel. Therefore, potentially significant impact would occur. Impacts regarding police protection will be further analyzed in the EIR and include consultation with the Los Angeles County Sheriff's Department regarding law enforcement resources available near the Project Site and impacts on police protection.

c) Schools?

No Impact. The Proposed Project improvements would benefit students attending the existing MMHS and would not result in an increase in student population. The Proposed Project would not result in changes in land uses (e.g., housing) that would result in population growth or create a greater demand for school services. Therefore, no impact to schools would result from Project implementation. This topic will not be further analyzed in the EIR.

d) Parks?

No Impact. The Proposed Project is intended to allow for the redevelopment of the former JCES and existing MMHS campuses that would enhance recreational opportunities for both educational and student athletics. The Proposed Project further includes the expansion of pedestrian trails around the Project Site that would be available for educational uses and open to the surrounding community. Therefore, the Proposed Project would not result in increased demand for additional parks and recreation services either on-site or in the surrounding area. The Proposed Project would not cause an increase in area population that would have the potential to increase demands on the City's recreational amenities or public parks. No impact would occur. This topic will not be further analyzed in the EIR.

e) Other public facilities?

No Impact. The Proposed Project is designed to serve the existing and future student population at MMHS and to provide separate education spaces for the middle school and high school students as well as shared facilities. No new population would be generated by the proposed uses; therefore, no increased demand on other public facilities is anticipated. The Proposed Project would not significantly affect any other public facilities. No impact would occur. This topic will not be further analyzed in the EIR.

3.16 RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Demand for parks and recreational facilities in an area are usually determined by the area's population. The Proposed Project does not include the development of new homes, which would lead to an increase in population and the need for additional park and recreation facilities. The Proposed Project involves the redevelopment of existing school campuses to serve the existing and future student population at MMHS. Therefore, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, nor would it require construction of new or expanded parks or recreational facilities. No impact to park and recreational facilities would occur. This topic will not be further analyzed in the EIR.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Potentially Significant Impact. The Proposed Project includes the development of recreational facilities and amenities within the confines of the Project Site, including a pedestrian trail through the Project Site that would be available for student and public use. The Proposed Project would not involve any construction of recreational facilities beyond what is proposed to serve the existing and future students. The physical impacts associated with the construction of the proposed recreational facilities are also analyzed in other sections of this Initial Study. Therefore, the Proposed Project could potentially result in a significant impact to recreational facilities, and this issue will be further analyzed in the EIR, and applicable mitigation measures will be identified.

3.17 TRANSPORTATION

Would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. Implementation of the Proposed Project would potentially result in the generation of additional vehicular traffic in the area and region as the District enrollment increases as anticipated under the Proposed Project. A traffic impact analysis will be prepared to determine the Proposed Project's traffic impacts and will help form the basis for the impact analysis to be provided in the EIR. The traffic impact analysis and EIR will address consistency with existing programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact is potentially significant and will be further evaluated in the EIR, and applicable mitigation measures will be identified.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Potentially Significant Impact. On September 27, 2013, SB 743 was signed into law, which started a process that fundamentally changed transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). As part of the updated CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code section 21099(b)(1)). On January 20, 2016, the Governor's Office of Planning and Research (OPR) released revisions to its proposed CEQA guidelines for the implementation of SB 743. Final review and rulemaking for the new guidelines were completed in December 28, 2018, when the California Natural Resource Agency certified and adopted the CEQA Guidelines update package, including guidelines section implementing SB 743. OPR allows agencies an opt-in period to adopt the guidelines; they become mandatory on July 1, 2020. Vehicle miles traveled (VMT) is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1) number of daily trips and (2) the average trip length (VMT = daily trips x average trip length).

Implementation of the Proposed Project would result in the generation of additional vehicular traffic in the area and region as anticipated after-school use intensity increases. As part of the traffic impact study, a VMT analysis will be included for existing and future conditions to address consistency with CEQA Guidelines section 15064.3, subdivision (b). This impact is potentially significant and will be further evaluated in the EIR, and applicable mitigation measures will be identified.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. Implementation of the Proposed Project would include the development of a new pick-up/drop-off area, and it would change the entryway into the Project Site with the development of Parking Lots D, E, and F, which could potentially result in vehicle or pedestrian conflict. The relocation of the driveway and interim and new parking areas could increase hazards if not properly designed and constructed. Therefore, impacts are considered potentially significant in this regard. A traffic study will be completed as part of the EIR. Impacts related to circulation/transportation design features will be further evaluated, and feasible mitigation measures (if necessary) will be identified in the EIR.

d) Result in inadequate emergency access?

Less Than Significant Impact. To address fire and emergency access needs, the Proposed Project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACoFD, such as those outlined in Chapter 8.12, Fire Code Adopted, of the City's Municipal Code, which incorporates by reference the 2016 California Fire Code. The City and LACoFD would be responsible for reviewing Project compliance with related codes and standards prior to issuance of building permits. Review from the City's Public Works Department would also be required for building plan check and traffic control plan review.

Additionally, during the building plan check and development review process, the City would coordinate with the LACoFD and Los Angeles County Sherriff 's Department to ensure that the necessary fire prevention and emergency response features are incorporated into the Proposed Project, and that adequate circulation and access (e.g., adequate turning radii for fire trucks) is provided in the traffic and circulation components of the Proposed Project. Thus, impacts on emergency access would be less than significant and will not be further analyzed in the EIR.

3.18 TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural

landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Less than Significant Impact. As of July 1, 2015, Public Resources Code sections 21080.1, 21080.3.1, and 21080.3.2 require public agencies to consult with California Native American tribes recognized by the Native American Heritage Commission for the purpose of mitigating impacts to tribal cultural resources. This law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions.

In accordance with Public Resources Code section 21080.3.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the Proposed Project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation for tribal cultural resources. The Santa Ynez Band of Chumash Indians, Gabrielino/Tongva San Gabriel Band of Mission Indians, and the Torres Martinez Desert Cahuilla Indians are on the SMMUSD's notification list pursuant to AB 52. The District provided notification letters to these tribes on May 15, 2020 and as of the time of publication of this Initial Study, no response has been received, and the 30-day time period for requesting consultation has expired.

In addition to notification of and potential consultation with Native American tribes that have requested to be notified of projects in the City, a Sacred Lands search request will be obtained from the Native American Heritage Commission (NAHC) as part of the tribal consultation process. The NAHC Sacred Lands search and previous EIR conducted for the MMHS Campus Improvements Project did not find the presence of Native American resources in the vicinity of the Project Site (Atkins 2011). Additionally, development of the MMHS Campus Improvements Project has not encounter any tribal cultural resources. The Project Site is not listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). As no Californian Native American Tribe has requested consultation, this topic will not be further addressed in the EIR.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. This topic will not be discussed in the EIR, as explained above in Section 3.18(a).

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. Buildout of the Proposed Project would not result in an increase in student capacity, but would require utility improvements to adequately serve the Project Site. Under the Proposed Project, the proposed domestic and fire water lines would connect to the existing 12-inch public water main on Morning View Drive. The Project Site is currently served by 11 septic tanks, and the Proposed Project would require development of 5 new septic tanks.

The existing drainage system drains via sheet flow and underground storm drain either south discharging to Morning View Drive through the driveways and curb outlets or west with connections to an unnamed stream. Implementation of the Proposed Project would also require new stormwater retention basins to treat runoff generated from the Project Site.

Electricity is provided by the Southern California Edison and natural gas by Southern California Gas Company. The existing electrical system on the Project Site is old and in need of replacement—power outages occur at least once during summer and at least two to three times during winter. Service providers would also be consulted to ensure all utilities would be available to properly serve the Project Site. Project development would result in the relocation or construction of new or expanded water, wastewater, storm drainage, electric power, natural gas, or telecommunication facilities. Therefore, this impact is potentially significant and will be evaluated in the EIR; mitigation measures will be identified as necessary.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. The City of Malibu is served by the Los Angeles County Waterworks District 29 and receives water through a contract with the West Basin Municipal Water District. Project implementation would not result in an increase in student capacity but would result in an increase in after-school use intensity, and landscaped areas. The potential volume of increased demand will be assessed in the EIR to compared existing and planned water supplies and determine whether implementation of the Proposed Project would result in significant impacts on local or regional water supplies. The EIR will determine whether sufficient water supplies are available to serve the Proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact is potentially significant and will be evaluated in the EIR; mitigation measures will be identified as necessary.

c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. See response to Section 3.19(a), above. The Proposed Project would need to upgrade the existing septic system. The adequacy of the new septic system would be evaluated in the EIR. This impact is potentially significant and will be evaluated in the EIR; mitigation measures will be identified as necessary.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Solid waste generated in the City of Malibu is disposed of at the Calabasas Landfill. Demolition of the existing buildings would generate demolition debris. Section 5.408, Construction Waste Reduction, Disposal, and Recycling, of the California Green Building Standards Code (CALGreen section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, demolition from the Proposed Project would not adversely impact landfill capacity.

The Proposed Project would not increase student capacity or introduce a new demand to the region, rather it would continue to serve the existing and future student population at the Project Site. The Proposed Project would not increase solid waste generation in the District. Therefore, the Proposed Project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals. Impacts would be less than significant and will not be further analyzed in the EIR. This topic will not be further analyzed in the EIR.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The District currently complies with federal, state, and local statutes and regulations related to solid waste, and would continue this practice. CALGreen section 5.408, Construction Waster Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, impacts would be less than significant and will not be further analyzed in the EIR.

3.20 WILDFIRE

Wildland fire protection in California is the responsibility of either the local government, state, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA covers a total of over 31 million acres, to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and

by CAL FIRE under contract to local government. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. LACoFD currently provides fire protection and emergency medical services to Malibu. Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The Project Site is in a Very High FHSZ in an LRA (CAL FIRE 2011).

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The Malibu EOP was approved by City Council on February 2018. Implementation of the Proposed Project would not have a significant impact on implementation of the EOP, as substantiated in Section 3.9(f), *Hazards and Hazardous Materials*. Therefore, impacts would be less than significant, and this impact will not be further analyzed in the EIR.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Potentially Significant Impact. The Project Site is in a Very High FHSZ in an LRA. The Project Site is situated on the southern flanks of the western portion of the Santa Monica Mountains, with elevations ranging from 86 to 180 feet above mean sea level. Therefore, there is potential for the Proposed Project to expose project occupants to pollutant concentrations from a wildfire. This impact is potentially significant and will be further evaluated in the EIR, and applicable mitigation measures will be identified.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Potentially Significant Impact. The Project Site is located in a Very High FHSZ in an LRA. The Proposed Project would require the installation and upgrade of new and existing infrastructure. Therefore, this impact is potentially significant and will be further evaluated in the EIR, and applicable mitigation measures will be identified.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact. Refer to Responses 3.7(a)(iii) and 3.10(c)(i) and (ii). This impact will be further evaluated in the EIR, and applicable mitigation measures will be identified.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As stated in Section 3.4, potentially significant biological impacts are anticipated because of wetlands and riparian habitats adjacent to the Project Site and the potential for rare or endangered plants or animal species within the Project Site. Additionally, implementation of the Proposed Project has the potential to impact important examples of California history or prehistory. The EIR will analyze these topics in greater detail to determine whether the Proposed Project would generate any significant impacts, and applicable mitigation measures will be identified.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact. Potentially significant impacts are identified in this Initial Study related to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. While impacts to geology and soils are site specific and generally do not contribute to cumulative impacts, cumulative impacts to the other resources for which potentially significant impacts are identified in this Initial Study will be addressed in the EIR. Mitigation measures will be recommended as needed.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Development of the Proposed Project could create direct and indirect adverse effects on humans. The Proposed Project has the potential to affect human beings through impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. The significance of these potential impacts will be analyzed in the EIR, and applicable mitigation measures will be identified.

d) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term goals?

Potentially Significant Impact. The Proposed Project addresses both short-term and long-term environmental goals. The Proposed Project has the potential to achieve short-term environmental goals to the

disadvantage of long-term goals through impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. The significance of these potential impacts will be analyzed in the EIR, and applicable mitigation measures will be identified.

3. Environmental Analysis

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