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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Franklin Elementary School Campus Plan Project

Draft Initial Study/Mitigated Negative Declaration

Prepared for:
SANTA MONICA-MALIBU
UNIFIED SCHOOL DISTRICT
Facility Improvement Projects
2828 4th Street
Santa Monica, CA 90405

NOVEMBER 2022

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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

FRANKLIN ELEMENTARY SCHOOL CAMPUS PLAN PROJECT

DRAFT INITIAL STUDY

Prepared for:

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT
FACILITY IMPROVEMENT PROJECTS
2828 4TH STREET
SANTA MONICA, CALIFORNIA 90405

Prepared by:

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NOVEMBER 2022

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ACRONYM LIST

AB	Assembly Bill
ACM	asbestos-containing material
ADT	average daily traffic
AFY	acre-feet per year
ALUC	Airport Land Use Commission
AQMP	Air Quality Management Plan
asml	above mean sea level
BAU	business as usual
BMP	best management practices
˚C	Celsius
CAAP	Climate Action and Adaption Plan
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFIRE	California Department of Forestry and Fire Protection
CalGEM	California Geologic Emergency Management Division
CALGreen	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CCS	(City of Santa Monica) Community & Cultural Services Department
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEC	California Energy Commission
CEI	Continuous Energy Improvement Program
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Society
CH_4	methane
CHPS	Collaborative for High Performance Schools
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CREST	Childcare, Recreation, Enrichment, Sports, Together
CRHR	California Register of Historic Resources
CRIA	Community Revitalization and Investment Authorities
dBA	A-weighted decibel scale
DOC	(California) Department of Conservation
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
ECHO	Enforcement and Compliance History Online
EDR	Environmental Database Report

EI	expansion index
EIFD	Enhanced Infrastructure Financing District
EIR	Environmental Impact Report
EMS	Emergency Management System
EPA	United States Environmental Protection Agency
EPP	Environmentally Preferable Purchasing
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FINDS	Facility Index System/Facility Registry System
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FY	fiscal year
g	gravity
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
HIST AUTO	Historical Auto Stations
HREC	historic recognized environmental condition
HQTA	High-Quality Transit Area
HRI	Historic Resources Inventory
HVAC	heating, ventilation, and air conditioning
HWTS	Hazardous Waste Tracking System
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study/Mitigated Negative Declaration
LADWP	(City of) Los Angeles Department of Water and Power
LBP	lead based paint
lbs	pounds
LCFS	Low Carbon Fuel Standard
LID	low-impact development
LRA	Local Responsibility Area
LUCE	Land Use Circulation Element
L_{dn}	day-night average sound level
L_{eq}	equivalent continuous sound level
L_{max}	maximum instantaneous noise level
LST	Localized Significance Thresholds
LUCE	Land Use and Circulation Element
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MS4	Storm Drain Municipal Separate Storm Sewer System Permit
MT	metric tons
$MTCO_2e$	metric tons CO_2 equivalent
MWD	Metropolitan Water District

MWh	megawatts per hour
N_2O	nitrous oxide
ND	Negative Declaration
NMA	Neighborhood Mobility Area
NO_x	nitrogen oxide
NOD	Notice of Determination
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyls
PDF	Project Design Feature
PDT	Pacific Daylight Time
PGA	peak ground acceleration
PGA	priority growth area
PL	Public Lands Zoning District
PM	particulate matter
PM_{10}	particulate matter 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter 2.5 micrometers or less in diameter
ppm	parts per million
PPV	peak particle velocity
PST	Pacific Standard Time
PV	photovoltaic
R2	Residential Zoning District
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
ROG	reactive organic gas
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Strategy/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCP	Sustainable City Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SMFD	(City of(Santa Monica Fire Department
SMFZ	Santa Monica Fault Zone
SMGB	Santa Monica Groundwater Basin
SMMC	(City of) Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Unified School District (District)
SMPD	(City of) Santa Monica Police Department
SMPL	(City of) Santa Monica Public Library
SMURRF	Santa Monica Urban Runoff Recycling Facility

SO_2	sulfur dioxide
SOI	Sphere of Influence
SRA	State Responsibility Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TPA	Transit Priority Area
USEPA	US Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VEC	vapor encroachment condition
VES	vapor encroachment screening
VMT	vehicle miles traveled
VOC	volatile organic compound
ZNE	zero net energy

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1.0 INTRODUCTION

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1. INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

The Santa Monica-Malibu Unified School District (SMMUSD or District) performed a facilities assessment of the Franklin Elementary School in order to update the campus to align with its Educational Specifications, which the SMMUSD Board adopted in 2019. The assessment identified priority and future improvements to be implemented, which provided the basis for the long-range *SMMUSD Franklin Elementary School Campus Assessment, Planning and Design Final Report* (November 20, 2020) (Campus Plan). The proposed Franklin Elementary Campus Plan Project's (Proposed Project) physical improvements consist of removing and demolishing eight buildings and nine portables, constructing three new buildings, and renovating two buildings and outdoor areas on the existing school campus. The District intends to move forward with design and engineering of the first phase of funded activities, and later phases of the Proposed Project would occur at the District's discretion when funding becomes available. Implementation of the Campus Plan would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change. The District intends to move forward with the Proposed Project's improvements and requires California Environmental Quality Act (CEQA) clearance beforehand.

The SMMUSD is the lead agency with principal responsibility for carrying out the Proposed Project. The District, as lead agency, is responsible for preparing environmental documentation in accordance with the CEQA to determine if the Proposed Project would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an Initial Study (IS) is prepared primarily to provide the lead agency with information to use as the basis for determining whether an environmental impact report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the Proposed Project. This Initial Study has been prepared to support the adoption of an MND.

1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a Proposed Project. Based on this and as mentioned above, SMMUSD is the lead agency for the Proposed Project.

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of the Initial Study/Mitigated Negative Declaration (IS/MND) is to evaluate the potential environmental impacts of the Proposed Project. This document is divided into the following sections:

- **1.0 Introduction** – This section provides an introduction and describes the purpose and organization of the document.
- **2.0 Project Information** – This section provides general information regarding the Proposed Project, including the Proposed Project name, lead agency and address, contact person, brief description of the Proposed Project location, General Plan land use designation and zoning district, identification of surrounding land uses, and identification of other public agencies whose

review, approval, and/or permits may be required. Also listed in this section is a checklist of the environmental factors that are potentially affected by the Proposed Project.

- **3.0 Project Description** – This section provides a detailed description of the Proposed Project.
- **4.0 Environmental Checklist** – This section describes the environmental setting and overview for each of the environmental issue areas, and analyzes the potential environmental effects of implementing the Proposed Project.

  CEQA Guidelines section 15063 describes the process of preparing an Initial Study and section 15064 provides guidance to determine if a project will have a significant effect on the environment that would necessitate preparation of an EIR. The Proposed Project, as described in Section 3.0, Project Description, would not result in conditions outlined in CEQA Guidelines Sections 15064 requiring preparation of an EIR. Accordingly, the checklist in Section 4.0 provides the substantial evidence required to support the finding that this IS/MND is the appropriate environmental document to adequately evaluate the environmental impacts of the Proposed Project.
- **5.0 References** – This section identifies documents, websites, people, and other sources consulted during the preparation of this IS/MND.

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

Section 4.0, Environmental Checklist, includes an analysis of 21 environmental issue areas, including CEQA Mandatory Findings of Significance, based on Appendix G of the CEQA Guidelines. The environmental issue areas that are analyzed in this IS/MND, numbered 1 through 21, consist of the following:

1. Aesthetics
2. Agriculture and Forest Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Energy
7. Geology and Soils
8. Greenhouse Gases
9. Hazards and Hazardous Materials
10. Hydrology and Water Quality
11. Land Use and Planning
12. Mineral Resources
13. Noise
14. Population and Housing
15. Public Services
16. Recreation
17. Transportation
18. Tribal Cultural Resources
19. Utilities and Service Systems
20. Wildfire
21. Mandatory Findings of Significance

Each environmental issue area is organized in the following manner:

- The **Overview** summarizes the existing conditions at the regional, subregional, and local levels, as appropriate, and identifies applicable plans and technical information for the particular issue area.
- The **Checklist Discussion/Analysis** provides a detailed discussion of each of the environmental issue checklist questions based on Appendix G of the CEQA Guidelines. The level of significance for each topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are evaluated in this IS/MND:
    - **No Impact:** No Project-related impact to the environment would occur with Project development.
    - **Less than Significant Impact:** The impact would not exceed the applicable significance thresholds.
    - **Less than Significant Impact with Mitigation Incorporated:** The impact, through the incorporation of mitigation measures, would reduce the Project-related impact to a less than significant level.
    - **Potentially Significant Impact:** The impact is considered potentially significant if the Proposed Project is anticipated to exceed identified significance thresholds of an environmental issue area, potentially resulting in an adverse impact to the environment.

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2.0 PROJECT INFORMATION

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2. PROJECT INFORMATION

1. Project title: Franklin Elementary School Campus Plan Project

2. Lead agency name and address: Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, California 90405

3. Contact person and phone number: Carey Upton
Chief Operations Officer
Phone: 310-450-8338 x79383

4. Project location: 2400 Montana Avenue
(between 23rd Place and 24th Place)
Santa Monica, California 90403
Latitude 34º02'20.49"N, Longitude 118º29'02.79"W
Section 31 Township 01 South Range 15 West San Bernardino Meridian
Assessor Parcel Number (APN): 4277-002-901

5. Project sponsor's name and address: Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, California 90405

6. General Plan designation: Institutional/Public Lands (main school campus) and Low Density Housing (adjacent satellite facility)

7. Zoning: Public Lands (PL) (main school campus) and Low Density Residential (R2) (adjacent satellite facility)

8. Description of the Project:

The Santa Monica-Malibu Unified School District (SMMUSD or District) performed a facilities assessment of the Franklin Elementary School in order to update the campus to align with its Educational Specifications, which the SMMUSD Board adopted in 2019. The assessment identified priority and future improvements to be performed, which provided the basis for the long-range SMMUSD Franklin Elementary School Campus Assessment, Planning and Design Final Report (November 20, 2020) (Campus Plan). The proposed Franklin Elementary Campus Plan Project (Proposed Project) planned improvements consist of removing and demolishing eight buildings and nine portables, constructing three new buildings, and renovating two buildings and outdoor areas on the existing school campus. The District intends to move forward with design and engineering of the first phase of funded activities. Later phases of the Proposed Project would occur at the District's discretion as funding is received. Implementation of the Campus Plan would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change. See Section 3.0, Project Description, for more details.

9. Surrounding land uses and setting:

Residential uses surround the campus on all four sides. The uses are predominantly single-unit residential structures, with some multi-family residences located to the northeast and southwest along Montana Avenue. Additionally, the school operates a satellite facility directly northeast of the school campus on the east side of 24th Place. Brentwood Country Club Golf Course is located approximately 0.25 miles to the northeast, adjacent to which is Brentwood Science Magnet Elementary School, which is 0.9 miles northeast of Franklin Elementary School. McKinley Elementary School and Lincoln Middle School are located 0.5 miles southeast and 0.6 miles southwest, respectively, of the Franklin Elementary School campus. Several parks, including Douglas Park are located approximately 0.25 miles southeast of the campus.

10. Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

State of California

- California Department of General Services, Division of the State Architect (construction plan review and approval)
- State Water Board's General Permit for Storm Water Discharges Associated with Construction and Lan Disturbance Activities (Order No. 2010-014-DWQ)

City of Santa Monica

- Public Works/Engineering (for grading permit)

11. 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 and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gases	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

12. 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 Proposed 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.

_____	11/8/22
Signature	Date
Carey Upton	Santa Monica-Malibu Unified School District
Printed Name	Lead Agency
Chief Operations Officer	
Title	

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3.0 PROJECT DESCRIPTION

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3. PROJECT DESCRIPTION

3.1 PROJECT LOCATION

Franklin Elementary School is located at 2400 Montana Avenue in the City of Santa Monica, as shown on **Figure 3-1**, **Regional Vicinity Map**, and **Figure 3-2**, **Project Vicinity Map**. The main entrance to the campus is off Montana Avenue, which bounds the school campus on the northwest. The main campus is bordered by 23rd Place to the southwest, 24th Place to the northeast, and Idaho Avenue on the southeast. The school includes a satellite pre-kindergarten and kindergarten facility next to the main campus on the northeast side of 24th Place, along Montana Avenue. The Proposed Project site is three blocks or approximately 2,000 feet northwest of Wilshire Boulevard, approximately 1.25 miles north of Interstate 10, 2 miles southwest of Interstate 405, and approximately 1.75 miles northeast of Santa Monica State Beach and the Pacific Coast Highway. The Franklin Elementary School campus is located in an urbanized residential area on fairly level topography. Refer also to **Figure 3-3**, **Aerial Photograph**.

3.2 PROJECT BACKGROUND

In 2019, the Santa Monica-Malibu Unified School District (SMMUSD or District) Board adopted Districtwide Educational Specifications (April 2019) that provide guidance on developing future learning environments to support new developments in technology and the expectations of the twenty-first century work force. The Educational Specifications shift the instructional design of the past that was defined by a traditional teacher-at-the-front-of-the-classroom style of learning to one that provides for rotational learning within the classroom, incorporating a variety of project-based learning experiences that allow for individualized, small group, and large group instruction to occur simultaneously. Learning spaces would be adapted with enhanced flexibility, mobility, and access to technology and resources in real time, where instructors and students may shift seamlessly between programs and instructional opportunities. The Education Specifications also call for larger classrooms, additional and larger multipurpose rooms, and several new shared spaces which do not currently exist. The redesigned campus would have more square feet of interior space, and likely need to make use of two-story buildings to allow for outdoor space.

Following adoption of the Educational Specifications, the District assessed the Franklin Elementary School campus and identified priority and future improvements to be performed in accordance with the Educational Specifications guidance. These improvements provide the basis for the long-range SMMUSD Franklin Elementary School Campus Assessment, Planning and Design Final Report (November 20, 2020). This report presented a draft program for the campus to implement the goals of the Educational Specifications. The findings of the draft assessment were further evaluated alongside other District priorities and realities, including the need for recreational/open space, budget, scheduling, phasing and the historical resources analysis. Following Board Policy 7113, adopted in February 2021, a Historic Resources Report was completed by Architectural Resources Group. Following this additional analysis and site/community meetings, the Board of Education defined the scope of the proposed Franklin Elementary Campus Plan Project (Proposed Project).

The Proposed Project would demolish and remove eight existing portable, two modular, and one permanent buildings on the site. Additionally, three new buildings would be constructed and two existing

buildings and outdoor areas on the existing school campus and adjacent satellite facility would be renovated. The Campus Plan activities would be implemented in phases, where the District intends to move forward with design and engineering of the first phase of the funded Proposed Project, with subsequent phases of the Proposed Project occurring at the District's discretion when funding becomes available. Implementation of the Campus Plan would not increase the capacity of Franklin Elementary School, and therefore would neither increase the consumption of potable water nor increase the generation of waste, and nor would the attendance boundaries change. The District intends to move forward with the Proposed Project improvements and requires CEQA documentation.

3.3 EXISTING USE AND CONDITIONS

The Proposed Project site is located in central Santa Monica in an urbanized residential and built-out portion of the City; refer to **Figure 3-2**, **Project Vicinity Map**. The existing campus is approximately 5.6-acres and has been developed with 10 permanent buildings and 9 portable buildings totaling approximately 68,387 square feet of developed building area. Franklin Elementary School dates to 1924, when it was originally designed as a two-story schoolhouse with eight rooms. As with most public schools in Santa Monica and in southern California, Franklin Elementary School sustained extensive structural damage as a result of the 1933 Long Beach Earthquake. Subsequently, the school was reconstructed and the campus has since been developed over decades, with: the reconstruction of the Main Building along Montana Avenue, completed in 1937; the Cafetorium and some of the central campus classroom buildings built around 1948; the satellite pre-kindergarten and kindergarten campus developed into its current layout in 1952; the library constructed in 1970; a series of modular buildings added in 1975; portable buildings added in the 1990s; and a 3-classroom modular building and additional portables added around 2000.

Given the relatively small area, the campus was built out in a linear manner from Montana Avenue towards Idaho Avenue, where new buildings were erected as close to existing buildings as the Santa Monica Municipal Code allowed. As a result, there are no sightlines through the middle of campus, and it is difficult to develop outdoor learning areas in the Code-constrained gaps between the buildings. The modular and portable buildings constructed around 1975 and the 1990s, respectively, are in poor condition, and the remaining buildings are in fair to good condition due to modernizations in 2000 and 2018. The structural design of most of the buildings do not support cost-effective renovations to create larger classrooms. Additionally, as mentioned, following the 1933 Long Beach Earthquake, the school was reconstructed, including the Main Building, for which the reconstruction was designed by architects Marsh, Smith and Powell in 1936. Together with the front lawn, the Main Building is individually eligible for listing as a historic resource in the California Register of Historical Resources. However, the Main Building is not considered individually eligible for the National Register of Historic Places due to its alteration and the compromised integrity over the decades. Refer to **Figure 3-4**, **Existing Campus** , for an illustration of the existing Franklin Elementary School campus.

The main entry to the campus and student drop-off/pickup area is located along Montana Avenue. A small staff parking lot with 28 spaces and additional pedestrian entry point is located at the southwest corner of the campus along 23rd Place and Idaho Avenue, as shown on **Figure 3-4**, **Existing Campus.** Classes begin at 8:30 a.m. Monday through Friday. Class is dismissed for kindergarten at 1:30 p.m. on regular days and at 11:30 a.m. on minimum days. First and second grades are dismissed at 2:45 p.m. on regular days and

at 1:30 p.m. on Wednesdays and minimum days. For the remaining grades (third through fifth), class is dismissed at 3:00 p.m. on regular days and at 1:30 p.m. on Wednesday and minimum days.

Additionally, the school provides before- and after-school programs throughout the year. These include the following: Full Time Childcare (and AM Care for a morning-only option), with before-school care from 7:00 a.m. until the regular school day begins at the first bell, and continuing from school dismissal until 6:00 p.m.; Early Express, which is an after-school part-time option operating from the time of kindergarten dismissal until 3:00 p.m., which is designed for parents who need childcare for their kindergartner until an older sibling is dismissed from school; Childcare, Recreation, Enrichment, Sports, Together (CREST), which is an after-school care program for 4th and 5th grade students in which participants receive homework assistance, structured indoor/outdoor activities, and local field trips, and taking place from school bell dismissal until 6:00 p.m.; and Enrichment, which is a variation of classes being offered once per week in the fall, winter, and spring for students in grades transitional-kindergarten-5th.

Franklin Elementary School is well-integrated with its neighborhood. The City of Santa Monica and the District entered into a Master Facilities Use Agreement in May 2012 that was renewed in 2022, which allows the City and the community to use the District's school facilities, including Franklin Elementary School campus. Under the Master Facilities Use Agreement, the Franklin Elementary School playfields, recreational facilities, and buildings are available for non-school programming rentals when school and school programs are not in session. The Master Facilities Use Agreement includes a Playground Partnership Agreement, which provides recreation space use at Franklin Elementary School, including the playground facing Idaho Avenue, the athletic facilities (soccer field and basketball courts), and lawn areas along Montana Avenue, to Santa Monica children and families on weekends and during school breaks when school is not in session. Authorized groups may utilize the school facilities: during the school year on weekends (Saturday and Sunday) from 9:00 a.m. to 5:00 p.m. Pacific standard time (PST) and 9:00 a.m. to 6:00 p.m. Pacific daylight time (PDT); weekdays during District holidays, 9:00 a.m. to 5:00 p.m. (with no school programming) and 2:00 p.m. to 5:00 p.m. (during school programming); weekdays during non-summer school breaks, 9:00 a.m. to 5:30 p.m. PST and 9:00 a.m. to 6:30 p.m. PDT; and weekdays during summer break, 9:00 a.m. to 6:30 p.m. (non-summer school) and 2:00 p.m. to 6:30 p.m. (during summer school). The community uses the playfield frequently, almost every day after school and every weekend. The playfields are locked at sunset and no community nighttime activities are programmed.

3.4 PROPOSED PROJECT

The Proposed Project as proposed would result in increasing the campus building area by approximately 24,685 square feet (from 67,581 square feet to 92,266 square feet), with increased classrooms and storage, and creation of flexible teaming spaces which can be split into additional classrooms during the phased implementation. The planned two-story building at the campus perimeter would open up the center of campus for better visibility and more shared activities while providing a clearer security perimeter. All existing portable buildings and two existing modular buildings would be demolished and removed entirely.

Specifically, the Proposed Project would remove and demolish eight buildings and nine portables, construct three new buildings, and renovate two buildings and outdoor areas on the existing school campus and satellite facility over five phases. The proposed changes in the campus building area are presented in **Table 3-1**, **Summary of Proposed Campus Plan Activities**. Refer also to **Figure 3-5A**,

Proposed Campus Plan Improvements, which provides an overview of the proposed campus plan, and **Figure 3-5B, Proposed Campus Plan Improvement Phases**, which shows the anticipated phasing for implementation of the planned improvements. Refer also to **Figures 4.1-1** and **4.1-2** in **Section 4.1, Aesthetics**, which provide views of the existing facilities and of the proposed improvements from various off-site public vantage points.

TABLE 3-1 SUMMARY OF PROPOSED CAMPUS PLAN ACTIVITIES

Campus Area	Existing Square Feet	Existing Campus Buildings to Remain (In Square Feet)	Proposed Campus Plan (In Square Feet)	Final Square Feet (Existing to Remain and Proposed Campus Plan)
Academic Core				
Preschool/Transitional-Kindergarten (T-K)/ Kindergarten	6,176	--	8,850	8,850
1st through 5th Grade	26,023	15,453	14,400	29,853
Special Education	3,866	--	2,400	2,400
Total	**36,065**	**15,453**	**25,650**	**41,103**
Specialized/Flexible Space				
Teaming Area	--	--	7,200	7,200
Flex Science/Art	894	--	--	--
Maker Lab	902	--	3,805	3,805
Café/Culinary/Multipurpose	6,609	4,769	7,390	12,159
Library	2,541	2,541	--	2,541
Total	**10,946**	**7,310**	**18,395**	**25,705**
Support and Other				
Administration	2,488	--	4,300	4,300
Restrooms	1,370	1,025	2,228	3,253
Staff Restrooms	198	139	180	319
Service Rooms	613	588	1,097	1,685
Circulation (*Interior*: new elevator, stairs, and walkways for new classroom building; *Exterior*: on-site circulation/accessible pathways throughout the campus)	15,901	7.901	8,000	15,901
Total	**20,570**	**9,653**	**15,805**	**25,458**
CAMPUS TOTALS	**67,581**	**32,416**	**59,850**	**92,266**

Source: dsk Architects 2022.

The District intends to move forward with design and engineering of Phase 1 of the funded activities, while later phases of the Proposed Project would occur at the District's discretion when funding becomes available. The proposed Campus Plan activities by phase are summarized below.

Phase 1 of the Proposed Project would include the removal of six portable buildings and construction of a new one-story Maker-Space building and outdoor Maker Yard, Maker Patio, and presentation platform,

in the place of the removed portables. The Maker-Space building provides two Maker "studios" designed to provide flexible uses for science laboratory, art studio, and other creative and collaborative project work. The first phase also includes playfield improvements consisting of modifying and resurfacing the existing field to include a walking surface around the field; and reorienting the space to fit three full basketball courts (from the existing two full and two half basketball courts). The playfield may be resurfaced with a composite, sustainable material such as cork, and would be designed to allow adequate drainage flow. Phase 1 also includes adding a firetruck turn lane, installing a firewater line to reach the central campus area, and installing replacement fencing near the Maker-Space area.

Phase 2 involves the demolition of Classroom Building F and removal of a portable shade structure located along the northeastern boundary of the campus, which has a total of seven classrooms, and the construction of a replacement two-story, L-shaped classroom building with larger-sized classrooms consisting of six regular classrooms; two special education classrooms; one kindergarten and one transitional-kindergarten classroom with dedicated restrooms; and custodial space. Phase 2 entails demolition of two classrooms and one restroom at the southern portion of the existing building and construction of the southern portion of the new two-story building. The northern portion of the existing building would remain in use during Phase 2.

Phase 3 focuses on renovations of the existing school buildings. During this phase, the main building would undergo interior renovations on the first floor to upgrade the administrative and teacher support spaces and restrooms. Phase 3 also includes removal of two existing modular buildings to create an outdoor learning space. Additionally, Phase 3 consists of remodeling the existing satellite campus to de-partition the transitional-kindergarten classroom, which would convert the existing three classrooms to two, and make minor upgrades to the outdoor transitional-kindergarten facility, such as refinishing the asphalt play surface and installing shading.

Phase 4 consists of demolishing the remaining portion of Building F (consisting of five classrooms and two restrooms) and completing construction of the new two-story building. The footprint of the new building would be larger than the existing buildings, where the new building would extend further south into the former handball court location, and the eastern extent would include the current outdoor patio area of the existing building. The eastern extent of the new two-story building would be approximately 15 feet from the adjacent alley.

Phase 5 involves demolition of the existing cafeteria and construction of a new cafeteria and culinary education building, and outdoor dining area. The area would also include establishing a new kitchen garden.

Walls and Fencing

The Proposed Project as designed would require the construction of new and/or improvements to existing walls and fencing on-site. A new retaining wall is proposed to run the length of the playfield, along the southern property boundary on Idaho Avenue. To accommodate the proposed change in grade along the length of the wall, the wall would be graduated to the slope, reaching a maximum height of three feet above grade. Perimeter fencing would be installed along the boundary of the playfield for security purposes (as well as to prevent the escape of balls and other objects from the campus). The fencing along the perimeter of the playfield would have a height of eight feet (as viewed from on-site) along Idaho Avenue; combined with the height of the retaining wall, the wall/fence (as viewed from off-site) would

reach a maximum height of eleven feet. It should be noted that no increase in overall height would occur with the Proposed Project's implementation, as the combined height of the proposed wall/fence would be the same as the height of the existing fence.

A retaining wall would also be constructed to extend along the adjacent alley on the eastern side of the property. A new retaining wall would also be constructed along the western side of the playfield/track, as well as along the eastern side of the on-site parking lot. The retaining wall along the western side of the track would range from approximately six inches in height above grade (stepping down with the sloping grade) to approximately two feet in height above grade near Idaho Avenue. The retaining wall along the eastern side of the parking lot would rise approximately six inches above finished grade on the playground side.

Additionally, existing fencing would be replaced along portions of the eastern, southern, and western boundaries of the site. New fencing would also be installed near the Maker-Space area.

3.4.1 Construction Schedule and Activities

Construction would occur over five, sequential, separate phases. The estimated construction schedule for each phase is shown in **Table 3-2**, **Construction Schedule**. Because the school campus has been fully developed, construction of each phase would generally involve demolition of some existing structures, followed by minor grading and foundation work, building construction, and architectural coating. Is anticipated that grading (cut and fill quantities), including that required to provide a level playfield, would be balanced on-site, thereby avoiding the need to export soils from the site. Phase 1 includes installing a shear wall, which would require additional excavation and earthwork to a maximum depth of approximately six feet. Phases 1 and 4 include creating outdoor spaces, which would include converting some grassy areas into hardscape or else replacing hard surfaces with grass and landscaping.

Construction would continue during the regular school session on school days. Construction work would intensify during summer and outside of regular school hours when class is not in session. The City of Santa Monica Noise Code (Chapter 4.12) allows construction activity between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturday. No construction work is allowed on Sunday or on holidays, and no nighttime construction work is anticipated to occur. To expedite the construction phases, the District is seeking a noise permit from the City to authorize construction activity to begin at 7:00 a.m. on weekdays. This is needed to allow for construction workers to arrive on campus and begin prior to the arrival period of students. As a condition of the permit, the District would provide notification to persons occupying property within 500 feet of the proposed construction activity prior to commencing work under the permit.

TABLE 3-2 CONSTRUCTION SCHEDULE

Phase	Construction Start	Completion	Duration
Phase 1	May 2023	August 2024	15 months
Phase 2	June 2025	April 2027	22 months
Phase 3	June 2027	May 2028	12 months
Phase 4	June 2029	April 2031	22 months
Phase 5	June 2031	December 2032	18 months

Source: SMMUSD 2022.

PN: 187261

Project Location

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N

0 2.5 5 10 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Regional Vicinity Map

Figure 3-1

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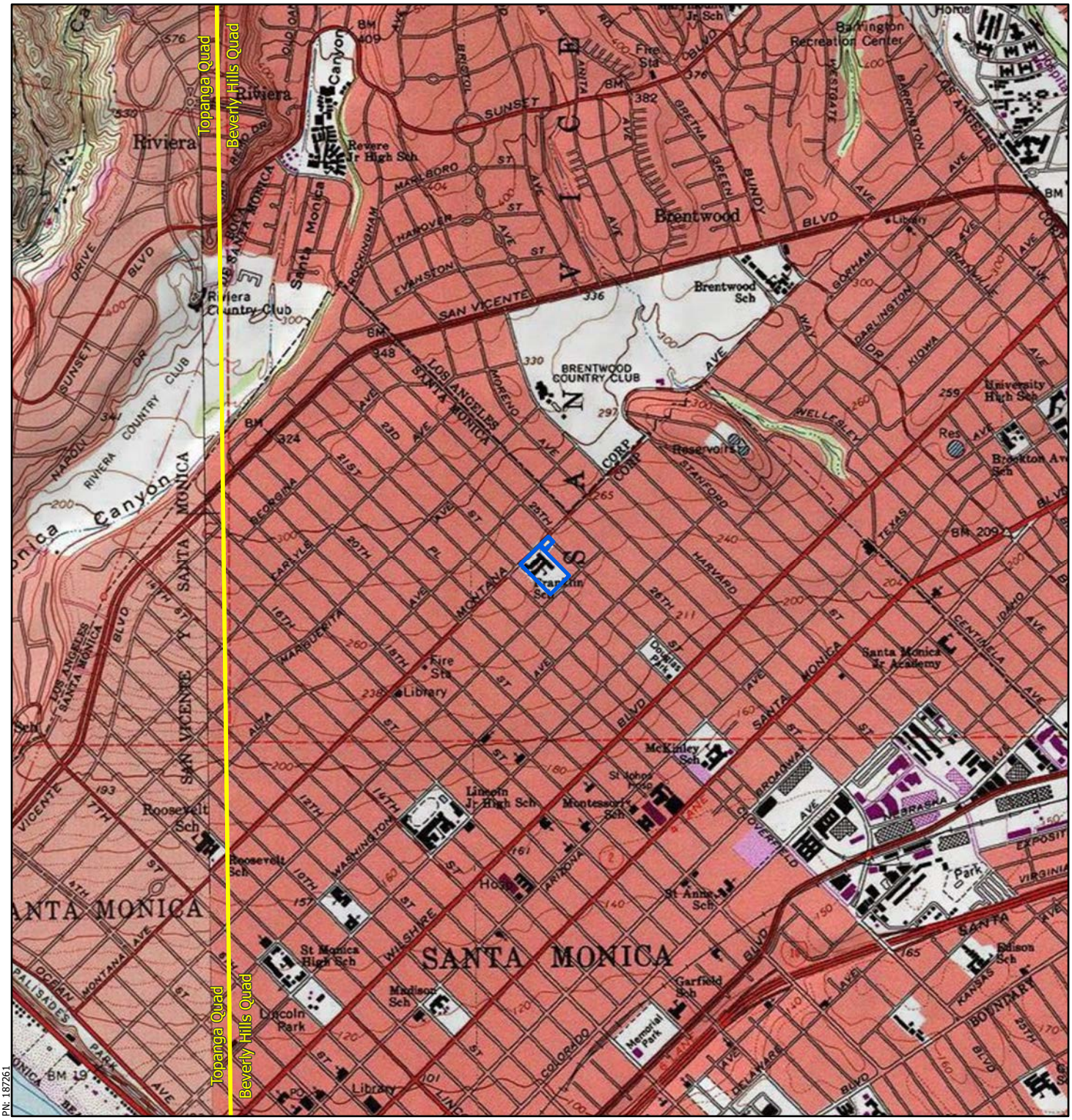

Project Area

Michael Baker INTERNATIONAL

N

0 0.25 0.5 1 Miles

Source: Esri, ArcGIS Online, USGS 7.5-Minute topographic quadrangle maps: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Project Vicinity Map

Figure 3-2

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PN: 187261

Project Area

Michael Baker INTERNATIONAL

0 50 100 200 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Aerial Photograph

Figure 3-3

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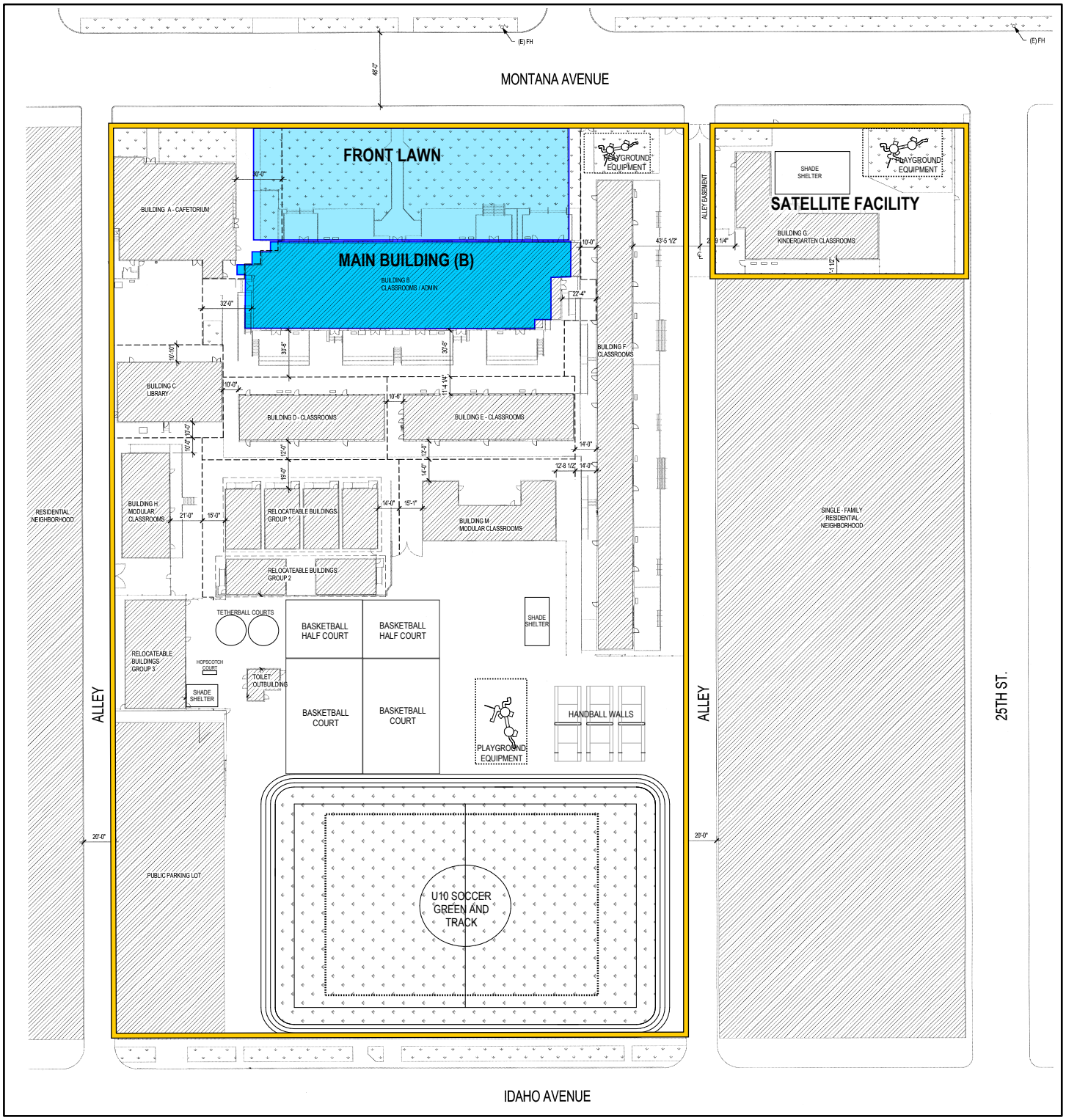

School Boundary

Main Building (B) - Historical Designation

Front Lawn - Historical Designation

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FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Existing Campus

Figure 3-4

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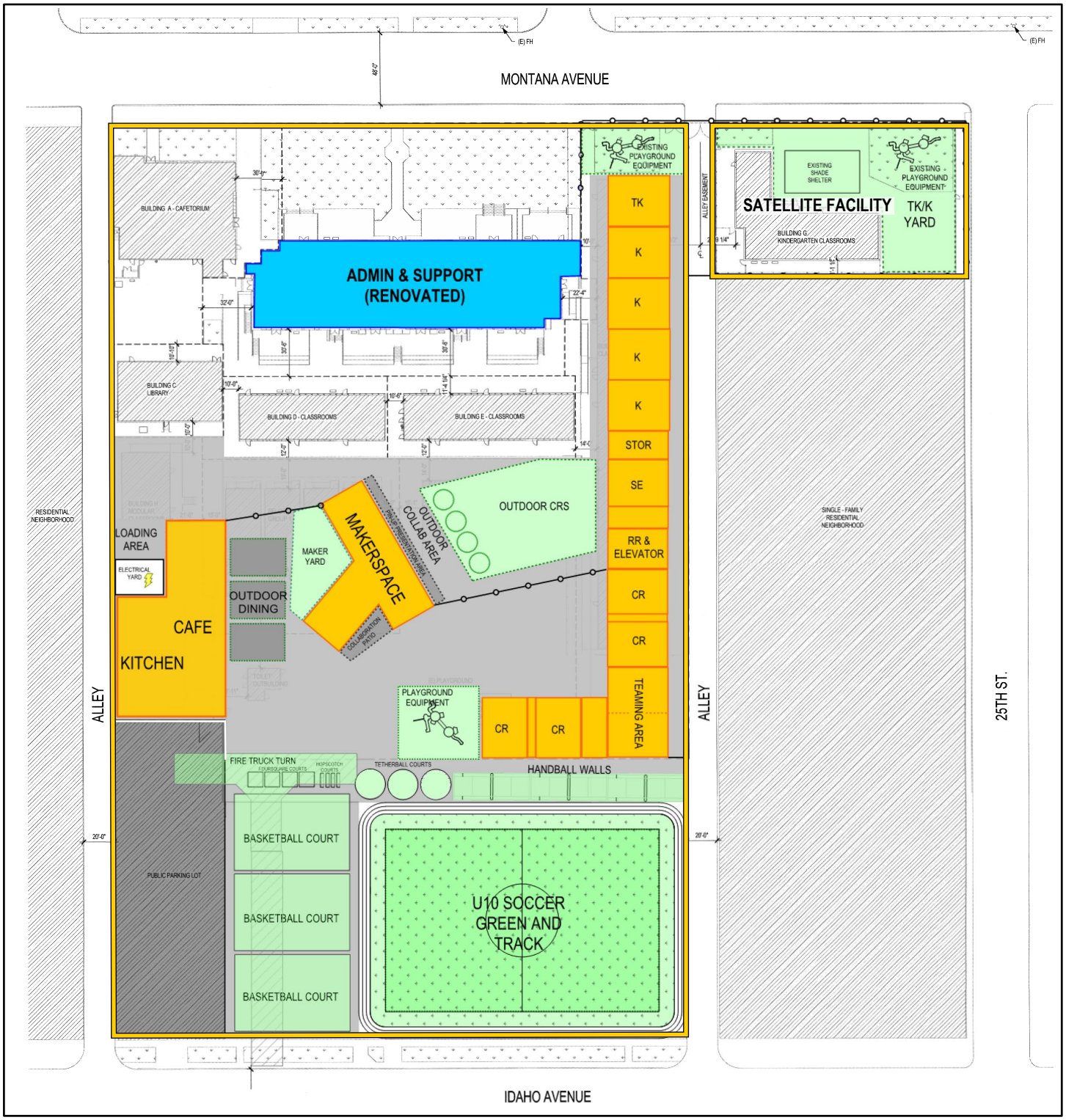

School Boundary

Main Building (B) - Historical Designation

New Work - Makerspace Building, Two-Story Classroom Building, and Cafeteria

New Work - Outdoor Learning Areas, U10 Soccer Field & Track Outdoor Learning Areas, 3 Basketball Courts, and Fire Apparatus Lane

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FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Proposed Campus Plan Improvements

Figure 3-5A

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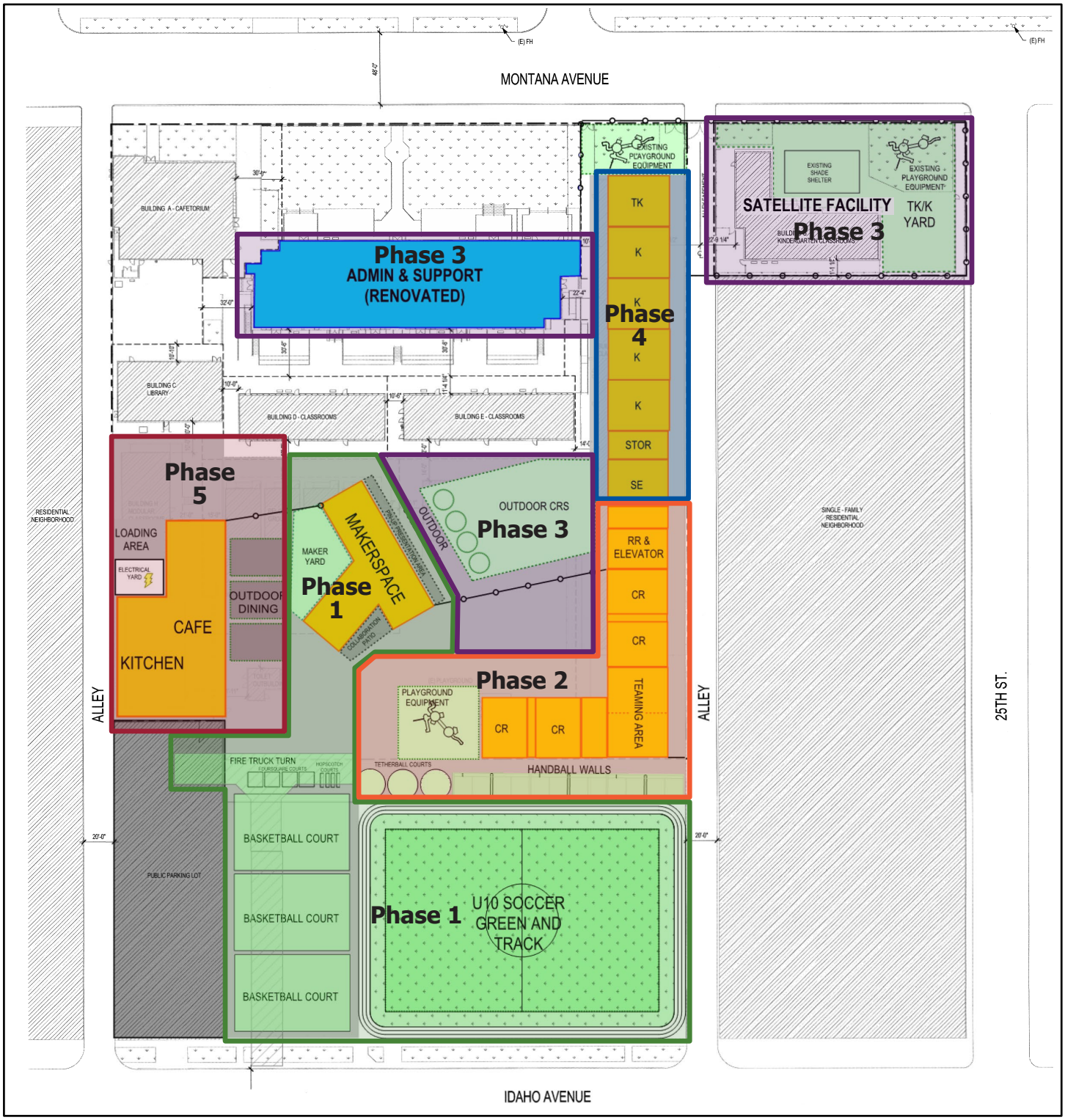

- Phase 1
- Phase 2
- Phase 3
- Phase 4
- Phase 5

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SANTA MONICA, CA

Proposed Campus Plan Improvement Phases

Figure 3-5B

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4.0 ENVIRONMENTAL CHECKLIST

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4. ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AESTHETICS. Except as provided in Public Resources Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Overview

The Proposed Project site is located in the City of Santa Monica, which is highly urbanized. The proposed construction activities and site improvements would occur on the existing elementary school campus; no off-site areas would be affected.

The City of Santa Monica General Plan does not contain an element that specifically addresses aesthetics or visual quality. The adopted Land Use and Circulation Element includes policies relative to development of the visual and architectural quality of the City. As the elementary school campus is a District-owned property (rather than State-owned), construction and operation of the Proposed Project is subject to consideration of the policies outlined in the City's General Plan as well as Article 9, Planning and Zoning, of the Santa Monica Municipal Code (SMMC).

Discussion of Impacts

4.1-a. Have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas may include such natural features as topography (e.g., mountain ranges, canyons), water bodies, rock outcrops, natural vegetation, or man-made alterations to the landscape. Public scenic vistas and view corridors provide views of such valued resources.

Within the City of Santa Monica and its vicinity, scenic resources include the Pacific Ocean, Santa Monica State Beach, the bluffs overlooking the beach, Santa Monica Pier, and the Santa Monica

Mountains. Additionally, the City's General Plan Land Use and Circulation Element identifies policies aimed at preservation of public view corridors, which include views of the ocean from east-west trending streets; public ocean views and the Santa Monica Pier from Palisades Park; and public views of Santa Monica from the Pier. Further, the 2018 Land Use Plan of the City's Local Coastal Program identifies view corridors and vantage points considered to be visual assets. However, no such resources are located in the vicinity of the Proposed Project's site, nor is the site located along any identified view corridors. In addition, public views of such resources experienced from the Proposed Project's vicinity are not officially designated as protected or scenic vistas.

As stated above, the site is located approximately 1.7 miles northeast of Santa Monica State Beach and the Pacific Coast Highway. Views of the subject site are not afforded from these locations due to distance, as well as intervening development and topography. The Santa Monica Mountains lie approximately 1.8 miles or more to the northwest. Due to distance, the site is not discernable within the City of Santa Monica when viewed from vantage points along these mountains. Further, due to the location of the campus within the City, the proposed improvements would not obstruct panoramic views of visually prominent or valued resources from any scenic viewpoints in proximity to the site.

Therefore, the Proposed Project would not obstruct an existing valued view or degrade a scenic vista. No impact would occur in this regard.

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

No Impact. The only officially state-designated scenic highway in Los Angeles County is State Route 2 (Angeles Crest Highway) as it extends through the Angeles National Forest (Caltrans 2022). The nearest portion of this scenic highway to the Proposed Project's site is located approximately 35 miles to the east/southeast. State Route 1 runs along the Pacific Ocean coastline approximately 1.8 miles to the southwest of the Proposed Project's site at its closest point and is eligible for scenic highway status; however, it has not been formally designated as such. Further, due to the distance from these roadways, existing topography, and intervening development, the Proposed Project would not substantially damage scenic resources within a state scenic highway.

Based on the findings of the Historic Resources Inventory Report (ARG 2022; see Appendix B-1), the original campus building (Main Building), which has served as the historical anchor of the Franklin campus, was determined to be individually eligible for listing in the California Register of Historical Resources under Criteria 1 and 3, and for local (City of Santa Monica) listing under Criteria 1, 4, and 5. The evaluation also included the lawn at the front (north) of the site. Refer to Section 4.5, Cultural Resources, for additional discussion. No other buildings or improvements on the Franklin Elementary School campus were identified as potential historical resources.

There is one potential historical resource adjacent to the Proposed Project's site, which is the Montana Avenue Multi-Family Residential Historic District, identified as a potentially eligible historic district in the City of Santa Monica's Historic Resources Inventory. However, it was determined that the Proposed Project would not compromise the significance or integrity of the

potential Montana Avenue Multi-Family Residential Historic District. The Proposed Project's site is currently a non-contributor to the potential district and would remain as such upon the Proposed Project's completion (ARG 2022).

The proposed improvements would result in limited visual changes of the façade of the original Main Building of the school; however, the Proposed Project has been designed to minimize such alterations so as to maintain the visual character and integrity of the original building. The Main Building, including its associated landscaping, would be retained during all phases of the Proposed Project. The Proposed Project would result in some alteration of the Main Building during Phase 3, which would involve interior renovations on the first floor of the building. However, such alterations would be limited to interior spaces. Additionally, interior spaces within the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. The alterations proposed as part of Phase 3 would not materially impair those physical characteristics that convey the significance of the resource, as they are confined to exterior spaces. Therefore, the Main Building would maintain integrity of setting following the Proposed Project's implementation and would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark. As indicated in Section 4.5, Cultural Resources, potential impacts to designated historical resources have been avoided through Project design, and therefore, a significant impact would not result with Project implementation. Refer to Section 4.5, Cultural Resources, for a more detailed discussion.

The Proposed Project site is currently developed and supports the existing school facilities. No rock outcroppings are present on-site or nearby. Several existing, ornamental, non-native trees would be removed with the proposed improvements, in particular to allow for improvements to the on-site playfield; however, none of the trees to be removed have been identified as having historic significance or scenic value.

No state-designated scenic highways traverse the Proposed Project site or vicinity. Further, the proposed improvements and upgrades would result in similar educational and recreational facilities on-site that would not substantially differ in character from those currently found on the subject property. For the reasons above, the Proposed Project would not substantially damage any scenic resources. No impact would occur.

4.1-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?

Less than Significant Impact. Refer also to the discussion under Impacts 4.1-a and 4.1-b, above. The Proposed Project's site is located within the City of Santa Monica which is highly urbanized. Therefore, evaluation as to whether the Proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings is not required. However, visual simulations were prepared for the public's information only and are not intended to support an analysis of any potential environmental impacts in this regard relative to CEQA

requirements. Although architectural design for the proposed improvements has not yet been finalized, the images depicted in **Figures 4.1-1** and **4.1-2** are intended to represent the anticipated visual character of the overall improvements. It should be noted that the overhead utility lines shown in **Figure 4.1-2B** are not proposed with the Proposed Project's improvements and are part of the existing setting; however, they are simulated in the view provided.

F**igure 4.1-1A, Visual Simulation 1: View Looking Southwest from Montana Avenue (Existing View)**, shows the existing view from the vicinity of Montana Avenue and 24th Street, looking southwest to the site. As shown, the view from this public vantage point is largely composed of the existing classroom building (adjacent to the alleyway) and playground in the foreground, with the main administration/support building and front lawn in the middleground. Although largely screened by the existing trees along the Proposed Project's frontage, portions of the Cafetorium are visible in the background.

Figure 4.1-1B, Visual Simulation 1: View Looking Southwest from Montana Avenue (Proposed View), shows the proposed view from the vicinity of Montana Avenue and 24th Street, looking southwest to the site, following the Proposed Project's implementation. As illustrated, views of the proposed improvements would include a portion of the TK building and pre-K yard, the two-story classroom building, kindergarten yard, and main administration/support building.

As illustrated, the proposed on-site improvements would be visible to travelers along Montana Avenue, similar to that which occurs under existing conditions. The proposed two-story classroom building would be visible in the foreground, with the main administration/support building (two stories to remain) in the middleground and the proposed auditorium in the background.

The two-story classroom building would represent a visual element of increased bulk and scale within the landscape; however, the building would be located adjacent to the two-story Main Building which would remain and would therefore generally reflect the height and scale of existing on-site structures from this vantage point and would provide a stepped transition in heights that are complementary to each other. The new construction and improvements to the Main Building have been designed to reflect the visual character and appearance of existing on-site buildings relative to materials and color, as well as to respect and maintain the architectural design of the campus. Further, landscaping improvements are proposed within the front lawn and along the Campus frontage, in combination with existing on-site trees and other vegetation, which would further enhance the visual appearance of the site and provide potential screening of views from intermittent vantage points along Montana Avenue. As such, the Proposed Project is not anticipated to substantially change the overall character of the site or adversely alter existing public views from Montana Avenue or other adjacent public roadways in the vicinity.

Figure 4.1-2A, Visual Simulation 2: View Looking Northwest from Idaho Avenue (Existing View), shows the existing view looking northwest to the site from Idaho Avenue near the alleyway located just to the east of the playfield. As shown, views from this vantage point are mainly of the playfield and playground in the foreground and middleground, with views of the existing classroom buildings comprising the background.

Figure 4.1-2B, Visual Simulation 2: View Looking Northwest from Idaho Avenue (Proposed View), shows the proposed view looking northwest to the site from Idaho Avenue near the alleyway located just to the east of the playfield. As shown, the new two-story classroom building would be visible in the middleground, running adjacent to the alleyway, along with the adjacent playground and other new one-story construction (makerspace, kitchen/café) visible in the western portion of the site.

As illustrated, views of the playfield and adjacent playground would not be substantially altered with the Proposed Project's implementation. The proposed two-story classroom building would be visible from this vantage point and would represent an element of increased height and scale on-site as compared to existing conditions; however, due to the viewing angle and building orientation, the structure would not represent a visually dominant element within the view. As stated above, other proposed improvements would be visible on-site from this viewpoint; however, such structures (makerspace, kitchen/café) would be one story in height and set back within the property at a distance from the roadway, thereby reducing their visibility and potential to substantially alter existing views of the site. Additionally, although the proposed improvements would be visible from this vantage point, public views from Idaho Avenue would occur at a distance from the new on-site construction and would further be buffered by the playfield, thereby reducing the visibility of such improvements within the visual landscape. Proposed landscaping (e.g., trees) would also help to intermittently screen public views into the site from the roadway as one travels along the campus frontage.

Construction of the two-story classroom building would alter existing (private) views from the rear yards of residences east of the school campus that currently back-up to the alleyway; refer to **Figure 3-5A, Proposed Campus Plan Improvements**, and **Figures 4.1-1** and **4.1-2**. The Proposed Project would respect the side yard setback requirement as identified in the City's Zoning Ordinance for the site, thereby distancing the classroom building from the alleyway (and the residential uses). Although the proposed structure would be of greater height and scale than the existing classrooms in this portion of the campus, the new building would not obstruct any designated views considered to be of scenic value. The new classroom would be constructed to meet the maximum roof line height limit of the City's zoning code, with allowable exceptions made for roof mounted equipment. Maximum allowable building height in the PL zone is two stories (32 feet); however, Section 9.21.060, Height Projections, identifies exceptions to height projections for building-mounted mechanical equipment and allows vertical projections to exceed the maximum allowable building height limit by 12 feet.

Additionally, the proposed structure would be in conformance with the setback standards in the underlying zone and is consistent with the one- and two-story development pattern of the surrounding area. The existing 11-foot high chain-link fence along the eastern property boundary (alleyway) of the school campus would be replaced in-kind (height and material) for security purposes. Screening material (e.g., green mesh material) would be incorporated into the fence to further screen views into the site from street/alley level, thereby reducing potential views of the campus buildings from such vantage points.

SMMUSD goals generally align with the City's intentions for new development (e.g., compatibility with surrounding land uses, context-sensitive design, maintaining visual and architectural quality, building articulation, pedestrian safety). All new construction would be designed and implemented in conformance with the adopted Franklin Elementary School Campus Master Plan, the Districtwide Plan for Sustainability, and other design and construction standards required for schools by the California Division of the State Architect.

To minimize the potential for change to existing public views of the site from surrounding public roadways, Project Design Feature (PDF) PDF-AES-1 is proposed to be implemented during the construction phase. PDF-AES-1 would require installation of temporary fencing along the perimeter of on-site areas where active construction is underway to screen views of such activity from off-site public roadways (at street level). Further, as construction would be short term in nature, any such disruption to or change in existing public views to the site (construction equipment, staging areas, ground disturbance, etc.) would be temporary and would cease when construction within a specific area of the site is completed.

For the reasons above, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Project Design Feature:

PDF-AES-1 Temporary Construction Fencing. Prior to commencement of any on-site grading or construction activity, the contractor shall install temporary fencing along the periphery of each active phase area of construction to adequately screen construction activities from view at the street level. The temporary fencing shall be removed in its entirety upon completion of construction activity within each active phase.

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

Less than Significant Impact. Artificial light during evening and nighttime hours emanates from building interiors and passes through windows, from street lighting for purposes of vehicular circulation and bike and pedestrian safety, and from other exterior sources (e.g., building illumination, security lighting, parking lot lighting, landscape lighting, and signage). The degree of illumination may vary widely depending on the amount of light generated, height of the light source, shielding by barriers or obstructions, type of light source, and weather conditions. Light spillover is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. Artificial light can be a nuisance to adjacent residential areas and diminish the view of the clear night sky. The adjacent residences are considered light sensitive, as occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources.

Glare is caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare is common in urban areas and is typically associated with exterior facades largely or entirely comprising highly reflective glass. Glare can also occur during evening and

nighttime hours with the reflection of artificial light sources such as automobile headlights. Glare-sensitive uses include the adjacent residential uses.

Construction

The Proposed Project's construction activities would occur in accordance with the provisions of SMMC Section 4.12.110, which limits the hours of construction to between 8:00 a.m. and 6:00 p.m., Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturday; no construction activities are permitted on Sunday or national holidays. However, pursuant to Section 4.12.110(e) of the City's Municipal Code, it is anticipated that the District would request City approval of an after-hours construction permit to authorize construction activity outside of allowable construction hours in order to improve public safety and avoid periods of increased traffic congestion. The after-hours construction permit would allow the contractor to begin work prior to the major drop-off of students during the morning hours.

It is anticipated that all Proposed Project construction would occur during daytime hours. Due to the nature of the improvements proposed and the anticipated construction schedule, it is not anticipated that nighttime construction would be required. Therefore, nighttime lighting sources such as spotlights, floodlights, and/or vehicle headlights would not be generated with construction, thereby avoiding potential adverse effects on adjacent sensitive receptors (e.g., residential uses).

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible areas where the reflection of sunlight could occur. It is also anticipated that the temporary fencing/screening (green mesh screening material incorporated) to be installed along the perimeter of on-site areas where active construction is underway (PDF-AES-1) would reduce potential glare effects on off-site receptors. However, any glare would be short term given the movement of construction equipment and materials within a given construction area and the temporary nature of construction activities. In addition, construction would occur during the daytime hours in accordance with the requirements of the SMMC. Accordingly, there would be a negligible potential for daytime glare to occur during construction.

Therefore, based on the analysis above, with adherence to existing SMMC regulations, light and glare associated with the Proposed Project's construction would not adversely impact daytime or nighttime views in the area.

Operation

The Proposed Project is a partial redevelopment of the existing school campus. While new exterior night lighting would be included, the amount of lighting would remain essentially the same for the campus. Consistent with SMMUSD practice, new lighting would utilize LED bulbs and would be appropriately shielded and aimed downward, to reduce potential spill light. Glare, and skyglow. New lighting would be limited to that necessary for safety and security, circulation, and facility identification purposes. As such, it is not anticipated that the Proposed Project's operation would result in a significant impact with regard to nighttime lighting.

Use of the on-site playfield and recreational amenities would occur during daytime hours, similar to existing conditions, and as such, the playfield and hardscape play areas would generally remain unlit. Lighting would only be implemented as required by the Division of the State Architect for means of egress to areas of safe dispersal and accessibility requirements. Additionally, the Proposed Project would not result in a change to operational hours of the school or its associated recreational facilities, and the school would continue to operate during normal daytime hours with exception of periodic evening events, as occurs under current conditions.

No improvements to the existing on-site parking lot are proposed, such as installation of new or upgrades to existing parking lot lighting. Therefore, the Proposed Project would not generate a new potential source of nighttime lighting in this regard.

Additionally, the Proposed Project does not include construction or installation of structures using highly reflective materials or surfaces that could create a new source of substantial glare adversely affecting daytime views in the area. As shown in **Figures 4.1-1** and **4.1-2**, the improvements proposed would reflect the architectural style of the existing on-site structures (constructed of stucco, brick, etc.). Any metal surfaces integrated into the proposed building facades would be surfaced with non-reflective paint or otherwise treated (i.e., galvanized) to minimize or reduce the potential for glare to occur. The use of highly reflective building materials or large expanses of glass is not proposed and would therefore not represent a new potential source of substantial glare.

For the reasons above, the Proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts resulting from light and glare would be less than significant.

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

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File: 187261Exhibits.indd

Source:

Visual Simulation 1: View Looking Southwest from Montana Avenue (Existing View)

Figure 4.1-1A

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SANTA MONICA, CA

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Visual Simulation 1: View Looking Southwest from Montana Avenue (Proposed View)

Source: dsk architects, October 3, 2022

Figure 4.1-1B

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Visual Simulation 2: View Looking Northwest from Idaho Avenue (Existing View)

Figure 4.1-2A

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File: 187261Exhibits.indd

Visual Simulation 2: View Looking Northwest from Idaho Avenue (Proposed View)

Source: dsk architects, October 3, 2022

Figure 4.1-2B

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4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES. 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 nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526 and by Government Code Section 51104(f)), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland 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 nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Overview

The California Department of Conservation (CDOC) 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 DOC manages an interactive website, the California Important Farmland Finder. This web-based program identifies the Proposed Project site as being outside of the farmland survey area. Specifically, the Proposed Project's site is identified as Urban and Built-Up Land, which is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, and is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, and other developed purposes (CDOC 2022a). Therefore, the Project site is not considered to be agriculturally important land.

Discussion of Impacts

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

No Impact. The CDOC identifies the Proposed Project's area as being outside of the farmland mapping boundary (CDOC 2022a). The Proposed Project's site is fully developed with existing educational uses and no farmland exists within the area. Therefore, the Proposed Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact would occur.

4.2-b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The Proposed Project would be located on a developed educational campus site. This site is not subject to a Williamson Act contract, and the site is zoned Institutional/Public Lands (PL) and R2 (Multi-Unit Low-Density Residential) by the City of Santa Monica. These zoning designations are not intended for agricultural uses. Therefore, implementation of the Proposed Project would have no impact on zoning for agricultural use or a Williamson Act contract. No impact would occur.

4.2-c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

***No Impact*.** The Proposed Project site contains no forest or timber resources, is not zoned for forestland protection or timber production, and would have no impact on any lands with such zoning. Thus, no impact would occur.

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

***No Impact*.** The Proposed Project site contains no forest or timber resources. Thus, no impact would occur.

4.2-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*.** No features of the Proposed Project would necessitate or result in the conversion of off-site farmland. The entirety of the Proposed Project would occur on the existing campus of the Franklin Elementary School. The Proposed Project's site is not located adjacent to or within the vicinity of any farmland. Thus, no impact would occur.

4.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Overview

The campus is in the South Coast Air Basin (Basin, SCAB). The SCAB is one of several regional air basins designated by the state for air quality management and air pollution control in California. The SCAB area consists of a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County.

The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the urban portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The agency's primary responsibility is ensuring that the federal and state ambient air quality standards are attained and maintained in the Basin. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, inspecting and issuing permits for stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3), carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO_2), and lead. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The Los Angeles County portion of the SCAB is designated as a nonattainment area for ozone, coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) for state standards and ozone, lead, and $PM_{2.5}$ for federal standards.

Regulatory Setting

South Coast Air Quality Management District

The SCAQMD is one of California's 35 air quality management districts that have prepared Air Quality Management Plans (AQMP) to accomplish a five-percent annual reduction in air emissions. On March 3, 2017, the SCAQMD Governing Board approved the *2016 Air Quality Management Plan* (2016 AQMP), which is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), and updated emission inventory methodologies for various source categories. The 2016 AQMP relies on a multi-level partnership of governmental agencies at the federal, state, regional, and local level. These agencies (EPA, CARB, local governments, Southern California Association of Governments [SCAG], and the SCAQMD) are the primary agencies that implement the AQMP programs.

Southern California Association of Governments

SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (2016-2040 RTP/SCS) was adopted on April 7, 2016. The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012–2035 RTP/SCS. These foundational policies, which guided the development of the 2016–2040 RTP/SCS strategies for land use, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;[1]
- Develop "Complete Communities;"
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

[1] Complete language: "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

On September 3, 2020, the Regional Council of SCAG formally adopted the *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020–2045 RTP/SCS). While SCAG has adopted the 2020-2045 RTP/SCS, SCAQMD has not released an updated AQMP. SCAQMD is currently working on the next iteration of the AQMP, the *2022 Air Quality Management Plan* (2022 AQMP), which will incorporate the 2020-2045 RTP/SCS. However, until the adoption of the 2022 AQMP, the Proposed Project's AQMP consistency will be analyzed against the 2016 AQMP and the RTP/SCS that was adopted at the time, the 2016-2040 RTP/SCS.

Air Quality Significance Thresholds

SCAQMD provides guidance to lead agencies on how to evaluate project air quality impacts related to the following criteria: (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay timely attainment of any air quality standard or any required interim emission reductions or other milestones of any Federal attainment plan.

The SCAQMD's *CEQA Air Quality Handbook* also provides significance thresholds for both construction and operation of projects within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result.[2] If a project generates emissions in excess of the established mass daily emissions thresholds, as outlined in **Table 4.3-1**, **South Coast Air Quality Management District Mass Daily Emissions Thresholds**, a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of impacts. In addition, SCAQMD establishes odor thresholds, which indicate that projects creating an odor nuisance pursuant to SCAQMD Rule 402 would cause a significant impact.

TABLE 4.3-1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT MASS DAILY EMISSIONS THRESHOLDS

Phase	Pollutant (lbs/day)					
	ROG	NO_X	CO	SO_X	PM10	PM2.5
Construction	75	100	550	150	150	55
Operational	55	55	550	150	150	55

Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, November 1993.

[2] It is acknowledged that although these thresholds developed by the SCAQMD are available, ultimately, it is the lead agency under CEQA whom determines the thresholds of significance for impacts.

Notes: ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM10 = particulate matter up to 10 microns; PM2.5 = particulate matter up to 2.5 microns; lbs = pounds

Localized Significance Thresholds

Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated July 2008) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with the Proposed Project's specific air emissions. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, PM_{10}, or $PM_{2.5}$. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways.

Cumulative Emissions Thresholds

The SCAQMD's 2016 AQMP was prepared to accommodate growth, meet state and federal air quality standards, and minimize the fiscal impact that pollution control measures have on the local economy. According to the SCAQMD CEQA Air Quality Handbook, project-related emissions that fall below the established construction and operational thresholds should be considered less than significant unless there is pertinent information to the contrary.

Discussion of Impacts

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

***Less than Significant Impact*.** The Proposed Project is located within the SCAB, which is governed by the SCAQMD. On March 3, 2017, the SCAQMD Governing Board adopted the 2016 AQMP. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, and updated emission inventory methodologies for various source categories. Additionally, the 2016 AQMP utilized information and data from SCAG and its 2016-2040 RTP/SCS. While SCAG has adopted the 2020-2045 RTP/SCS, the SCAQMD has not released an updated AQMP. As such, this consistency analysis is based off the 2016 AQMP and the associated 2016-2040 RTP/SCS. According to the SCAQMD's CEQA Air Quality Handbook, projects must be analyzed for consistency with two main criteria, as discussed below.

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

i. Would the project result in an increase in the frequency or severity of existing air quality violations?

Since the consistency criteria identified under the first criterion pertains to pollutant concentrations, an analysis of the Proposed Project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating the Proposed Project's consistency. As

discussed in Response 4.3-c (below), localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant during the Proposed Project's construction and operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations. Because volatile organic compounds (VOCs) are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOC plays in O_3 formation, it is classified as a precursor pollutant for which only a regional emissions threshold has been established. As such, the Proposed Project would not cause or contribute to localized air quality violations or delay the attainment of an air quality standard or interim emissions reductions specified in the 2016 AQMP.

ii. Would the project cause or contribute to new air quality violations?

As discussed below in Response 4.3-b and Response 4.3-c, the Proposed Project would result in emissions below the SCAQMD thresholds. Therefore, the Proposed Project would not have the potential to cause or contribute to a violation of the ambient air quality standards.

iii. Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As shown in Response 4.3-c, the Proposed Project would result in less than significant impacts with regard to localized concentrations during the Proposed Project's construction and operations. As such, the Proposed Project would not delay the timely attainment of air quality standards or 2016 AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Basin focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether the project exceeds the assumptions utilized in preparing the forecasts presented in the 2016 AQMP. Determining whether or not a project exceeds the assumptions reflected in the 2016 AQMP involves the evaluation of the three criteria outlined below. The following discussion analyzes each criterion.

i. Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the City's General Plan, SCAG's *Growth Management* Chapter of the *Regional Comprehensive Plan and Guide* (RCPG), and SCAG's 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

Development consistent with the growth projections in the General Plan is considered to be consistent with the AQMP. The Proposed Project is consistent with the land use designation and development density presented in the General Plan; refer to Section 4.11, Land Use and Planning. Further, the Proposed Project would not result in an increase in population growth in the City, nor would student attendance increase due to the proposed renovation of campus facilities; refer to Section 4.14, Population and Housing. The Proposed Project is therefore consistent with this AQMP consistency criterion and would not result in significant impacts in this regard.

The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. As the SCAQMD has incorporated these same projections into the 2016 AQMP, it can be concluded that the Proposed Project would be consistent with the 2016 AQMP.

ii. Would the project implement all feasible air quality mitigation measures?

The Proposed Project would result in less than significant air quality impacts and would comply with all applicable SCAQMD rules and regulations, including Rule 403, which requires excessive fugitive dust emissions controlled by regular watering or other dust prevention measures, and Rule 1113, which regulates the ROG content of paint. As such, the Proposed Project meets this AQMP consistency criterion.

iii. Would the Project be consistent with the land use planning strategies set forth in the AQMP?

Land use planning strategies set forth in the 2016 AQMP are primarily based on the 2016-2040 RTP/SCS. The campus is designated Institutional/Public Lands (main school campus) and Low-Density Housing (adjacent satellite facility), which is intended for institutional uses compatible with a location in closer proximity to residential development that do not generate substantial volumes of heavy truck traffic. As discussed in Section 4.8, Greenhouse Gases, the Proposed Project would promote redevelopment of underperforming outmoded nonresidential uses and implement various SCAG policies. Further, the Proposed Project would be consistent with the goals of Senate Bill 375. The Proposed Project would also not result in an increase in population growth in the City, nor would student attendance increase due to the proposed renovation of campus facilities. As the SCAQMD has incorporated these same projections into the 2016 AQMP, it can be concluded that the Proposed Project would be consistent with the 2016 AQMP. As such, the Proposed Project meets this AQMP consistency criterion.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Proposed Project on air quality in the Basin. The Proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. As discussed above, the Proposed Project's long-term influence would also be consistent with the goals and policies of the AQMP and is consistent with the SCAQMD's 2016 AQMP. Therefore, the Proposed Project would result in a less than significant impact related to this threshold.

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

Less than Significant Impact. The Proposed Project has the potential to generate short-term emissions during construction and long-term emissions during operations. Construction activities may generate temporary pollutant emissions through the use of heavy-duty construction equipment (e.g., graders, pavers), as well as through construction worker, vendor, and haul trips. The Proposed Project's operations may generate area, energy, mobile, or stationary source emissions. The following analysis discusses the Proposed Project's generated construction, operational, and cumulative emissions.

CRITERIA POLLUTANTS

The following discusses the specific criteria pollutants of concern considered as part of this analysis.

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of CO.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" O_3 layer) extends upward from about 10 to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays.

While O_3 in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. This "bad" O_3 is a photochemical pollutant and is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible to the health effects of O_3. Short-term exposure (lasting for a few hours) to O_3 at elevated levels can result in aggravated respiratory diseases (such as emphysema, bronchitis, and asthma), shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, and increased fatigue, as well as chest pain, dry throat, headache, and nausea.

O_3 needs VOCs, NO_X, and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate concentration of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can

form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

Nitrogen Dioxide (NO_2). NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (which is the primary pollutant indicated in NO_X) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, CARB adopted amendments to the statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both state and federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with preexisting cardiopulmonary disease. On June 20, 2002, CARB adopted amendments for statewide annual ambient particulate matter air quality standards. These standards were revised and established due to increasing concerns by CARB that previous standards were inadequate, as almost everyone in California is exposed to levels at or above the current state standards during some parts of the year, and the statewide potential for significant health impacts associated with particulate matter exposure was determined to be large and wide-ranging.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell that is primarily formed by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with sulfur oxides (SO_X). Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor; some examples include gasoline,

alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOC is not considered a criteria pollutant; however, it is a precursor to O_3, which is a criteria pollutant. Due to the role VOC plays in O_3 formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. The SCAQMD uses the terms VOC and ROG (see below) interchangeably.

Reactive Organic Gases (ROG). As mentioned, ROG are also precursors in forming O_3 and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and NO_X react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O_3, which is a criteria pollutant. The SCAQMD uses the terms ROG and VOC (see above) interchangeably.

Short-Term Construction Impacts

Short-term air quality impacts are anticipated during grading and construction activities associated with implementation of the Proposed Project. Temporary emissions would result from the following activities:

- Particulate (fugitive dust) emissions from demolition and grading.
- Exhaust emissions from the construction equipment and the motor vehicles of the construction crew.

Construction emissions were calculated using California Emissions Estimator Model version 2020.4.0 (CalEEMod) based on the construction information compiled for the Proposed Project; refer to Appendix A, Air Quality/Greenhouse Gas /Energy Data. The Proposed Project's construction is expected to begin in 2023 and, for the purposes of the air quality analysis, is modeled to occur for just over 10 years, whereas the actual time frame may be longer. The estimated construction schedule for each phase is shown in **Table 4.3-2**, and it should be noted that applying a shorter construction time frame than the actual time frame results in a conservative analysis that would increase the modeled Proposed Project's construction emissions quantities.

Proposed Project construction would be completed in five separate phases that are not anticipated to overlap. Because the school campus has been fully developed, each construction phase would generally involve demolition of some existing structures, followed by minor grading and foundation work, building construction, and architectural coating. Emissions for each construction phase have been quantified based upon the phase duration and equipment type.

Each of the five phases were evaluated individually to determine if the SCAQMD thresholds would be exceeded. Results of the construction emission modeling are shown in **Table 4.3-2**. Proposed Project construction-generated increases in emissions would be predominantly associated with construction equipment, earthwork and excavation activities, and emissions from trucks transporting materials to and from the campus.

It should be noted that the District has committed to use of Tier 4 construction equipment which incorporate control technologies to further reduce emissions during all phases of the Proposed Project's construction. Additionally, the Proposed Project would adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track-out requirements, etc.) to reduce PM_{10} and $PM_{2.5}$ concentrations. These are standard dust control measures that the SCAQMD requires for all projects.

TABLE 4.3-2 DAILY CONSTRUCTION EMISSIONS – MAXIMUM POUNDS PER DAY (PHASE 1-5)

Emissions Source	Pollutant (pounds per day)[b]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Phase 1[a]						
2023 Emissions	1.49	15.13	14.63	0.03	3.47	1.98
2024 Emissions	0.98	4.42	6.74	0.01	0.31	0.21
Maximum Daily Emissions	1.49	15.13	14.63	0.03	3.47	1.98
SCAQMD Significance Threshold	75	100	550	150	150	55
Threshold Exceeded After Mitigation?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 2[a]						
2025 Emissions	1.81	16.69	25.50	0.05	1.22	0.75
2026 Emissions	2.03	6.29	10.06	0.02	0.45	0.29
Maximum Daily Emissions	2.03	16.69	25.50	0.05	1.22	0.75
SCAQMD Significance Threshold	75	100	550	150	150	55
Threshold Exceeded After Mitigation?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 3[a]						
2027 Emissions	1.00	8.05	13.41	0.03	0.59	0.37
2028 Emissions	3.95	1.15	1.88	0.00	0.09	0.06
Maximum Daily Emissions	3.95	8.05	13.41	0.03	0.59	0.37
SCAQMD Significance Threshold	75	100	550	150	150	55
Threshold Exceeded After Mitigation?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 4[a]						
2029 Emissions	1.12	8.80	14.18	0.03	0.76	0.41
2030 Emissions	0.19	1.02	2.49	0.00	0.06	0.03
2031 Emissions	1.48	5.42	12.49	0.02	0.31	0.15
Maximum Daily Emissions	1.48	8.80	14.18	0.03	0.76	0.41
SCAQMD Significance Threshold	75	100	550	150	150	55
Threshold Exceeded After Mitigation?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 5[a]						
2031 Emissions	2.34	11.18	27.19	0.06	0.73	0.39
2032 Emissions	1.19	4.18	9.40	0.02	0.22	0.12
Maximum Daily Emissions	2.34	11.18	27.19	0.06	0.73	0.39
SCAQMD Significance Threshold	75	100	550	150	150	55
Threshold Exceeded After Mitigation?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Refer to Appendix A for assumptions used in this analysis. The numbers may be slightly off due to rounding.

a. The Proposed Project would be required to adhere to standard SCAQMD regulations, such as implementing SCAQMD Rule 403, which would further reduce construction emissions. Modeling assumptions include compliance with SCAQMD Rule 403 which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.

b. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD. Winter emissions represent worst-case.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Proposed Project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading and construction is expected to be short-term and would cease upon Proposed Project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities is both a local nuisance and a health concern. Of particular concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and resuspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

The Proposed Project must include all required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adherence to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM_{10} and $PM_{2.5}$ concentrations. As noted in **Table 4.3-2**, total PM_{10} and $PM_{2.5}$ emissions would not exceed SCAQMD thresholds during construction. Thus, construction air quality impacts associated with fugitive dust would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the Proposed Project's site, employee commutes to the Proposed Project's site, emissions produced on-site as equipment is used, and emissions from trucks transporting materials to/from the site. Standard SCAQMD regulations, such as maintaining all construction equipment in proper tune and shutting down equipment when not in use for extended periods of time, would be implemented. As presented in **Table 4.3-2**, construction equipment and worker vehicle exhaust emissions would not exceed the established SCAQMD threshold for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the SCAQMD, the ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Rule 1113, all architectural coatings for the proposed structures would comply with specifications on painting practices as well as regulation on the ROG content of paint. ROG (VOC) emissions associated with the Proposed Project would be less than significant; refer to **Table 4.3-2**.

Total Daily Construction Emissions

In accordance with the SCAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG/VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As indicated in **Table 4.3-2**, criteria pollutant emissions during construction of the Proposed Project would not exceed the SCAQMD significance thresholds. Thus, impacts due to the total construction-related emissions would be less than significant.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are human health hazards when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, serpentinite and ultramafic rocks are not known to occur within the Proposed Project's area.[3] As discussed further in Section 4.9, Hazards and Hazardous Materials, of this EIR, due to the age of the current structures on the site, there is the potential for asbestos to have been used in the building materials. Prior to demolition activities, the District would conduct a survey for asbestos containing materials (ACMs). In the event that ACMs are found, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations,

[3] Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report*, August 2000, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5126473.pdf.

including 40 CFR Part 763 Subpart E, Asbestos-Containing Materials in Schools Rule and SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities. With compliance with relevant regulations and requirements, Proposed Project construction activities would not expose people to a significant release of asbestos.

Long-Term Operational Emissions

The Proposed Project would not result in additional student enrollment, and therefore would not generate additional trips or associated mobile source emissions. The Proposed Project's operation-generated emissions would be associated with the area sources, landscape maintenance equipment, and architectural coatings (e.g., repainting). The Proposed Project's related long-term air pollutant emissions would not exceed the SCAQMD's regional significance thresholds. Therefore, impacts to the regional air quality from the Proposed Project's related operational phase emissions would be less than significant. The analysis of daily operational emissions has been prepared by CalEEMod Version 2020.4.0. **Table 4.3-3** presents the anticipated Proposed Project's related operational emissions. Emissions from each source are discussed in more detail below.

TABLE 4.3-3 LONG-TERM AIR EMISSIONS

Emissions Source	Pollutant (pounds/day)[1,2,3]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Area	1.09	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.14	0.12	0.00	0.01	0.01
Total Summer Emissions	**1.11**	**0.14**	**0.12**	**0.00**	**0.01**	**0.01**
SCAQMD Threshold	55	55	550	150	150	55
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Project Winter Emissions						
Area	1.09	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.14	0.12	0.00	0.01	0.01
Total Winter Emissions	**1.11**	**0.14**	**0.12**	**0.00**	**0.01**	**0.01**
SCAQMD Threshold	55	55	550	150	150	55
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the SCAQMD.
2. The numbers may be slightly off due to rounding.
3. It should be noted that the Project would exceed 2019 Title 24 Building Energy Efficiency Standards; however, this reduction has not been accounted for in CalEEMod to provide a conservative analysis.
Refer to Appendix A, Air Quality/Greenhouse Gas /Energy Data, for assumptions used in this analysis.

Area Source Emissions

Area source emissions are generated from consumer products, architectural coating, and landscaping. The Proposed Project would be required to comply with SCAQMD Rule 1113. SCAQMD Rule 1113 restricts the VOC content of architectural coatings, reducing ROG emissions. Area source emissions would be generated due to an increased demand for consumer products,

landscape equipment usage, and area architectural coating associated with Project development. As seen in **Table 4.3-3**, the Proposed Project's ROG emissions would not exceed SCAQMD thresholds. As such, a less than significant impact would occur due to the Proposed Project's operational area source emissions.

Energy Source Emissions

Energy source emissions (i.e., generated at the site of the power generation source) would be generated as a result of electricity and natural gas usage associated with the Proposed Project. The primary use of electricity and natural gas by the Proposed Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. It should be noted that the Proposed Project would comply with the most current version of the California Green Building Standards Code and Title 24 standards, which would further reduce the Proposed Project's energy use. As such, the Proposed Project's operational emissions would not exceed the SCAQMD regional thresholds for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$; refer to **Table 4.3-3**. Therefore, a less than significant impact would occur in this regard.

Total Operational Emissions

As shown in **Table 4.3-3**, the total operational emissions for both summer and winter would not exceed established SCAQMD thresholds. Therefore, the Proposed Project's impacts in this regard would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors VOCs and NO_X affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region.

As noted in the Brief of Amicus Curiae by the SCAQMD,[4] the SCAQMD acknowledged it would be extremely difficult if not impossible to quantify health impacts of criteria pollutants for various reasons, including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD),[5] the SJVAPCD has acknowledged that currently available modeling

[4] South Coast Air Quality Management District, Application of the South Coast Air Quality Management District for Leave to File Brief of Amicus Curiae in Support of Neither Party and Brief of Amicus Curiae. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, 2014.

[5] San Joaquin Valley Air Pollution Control District, Application for Leave to File Brief of Amicus Curiae Brief of San Joaquin Valley Unified Air Pollution Control District in Support of Defendant and Respondent, County of Fresno and Real Party In Interest and Respondent, Friant Ranch, L.P. In the Supreme Court of California. Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno, 2014.

tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient levels of O_3 in the air (concentration) that an individual person breathes. The SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD further states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O_3 levels at the highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3 related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Proposed Project would not exceed SCAQMD thresholds for construction and operational air emissions, the Proposed Project would have a less than significant impact for air quality health impacts.

Cumulative Short-Term Construction Impacts

With respect to the Proposed Project's construction-related air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to Federal Clean Air Act mandates. As such, the Proposed Project would comply with SCAQMD Rule 403 requirements and the adopted 2016 AQMP emissions control measures. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the Proposed Project. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted 2016 AQMP emissions control measures) would also be imposed on construction projects throughout the Basin, which would include related projects.

According to the *SCAQMD CEQA Air Quality Handbook*, project-related emissions that fall below the established construction thresholds should be considered less than significant unless there is pertinent information to the contrary. As discussed previously, the Proposed Project would not result in short-term air quality impacts, as emissions would not exceed the SCAQMD adopted construction thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. As a result, the Proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, the Proposed Project's incremental construction impacts would be less than cumulatively considerable and impacts in this regard are less than significant.

Cumulative Long-Term Operational Impacts

As discussed, the Proposed Project would not result in long-term operational air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts

related to cumulative conditions on a project-by-project basis. Furthermore, the Proposed Project's adherence to SCAQMD rules and regulations would help reduce operational air emissions. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the Proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant and no cumulative operational impacts would result in this regard.

Conclusion

In conclusion, the Proposed Project would not result in significant construction-related impacts, operational impacts, or cumulative impacts. As discussed above, the Proposed Project would result in emissions below the SCAQMD thresholds and naturally occurring asbestos is not known to occur at the Proposed Project's site. As such, the Proposed Project would result in a less than significant impact related to this threshold.

4.3-c Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The nearest sensitive receptors to the Proposed Project site are the students and faculty on-campus, as well as the single-family residential uses surrounding the Proposed Project's boundary. However, the distance from demolition, grading, and construction activities would change with each phase of construction. It should be noted that displaced school faculty and students would be relocated to different locations within the campus during construction. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction and operations impacts (stationary sources only).

Localized Significance Thresholds (LST)

LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST lookup tables for 1, 2 , and 5 acres emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD notes that any project over 5 acres may need to perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The Project is located within Sensitive Receptor Area (SRA) 2, Northwest Coastal Los Angeles County area.

Construction

Total acres disturbed per day during the grading phase is based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. Based on CalEEMod results, the most soil disturbance activities would occur during Phase 1 of the construction. The Proposed Project would disturb approximately 22 acres over 44 days (0.5 acres per day) during Phase 1. LST thresholds are provided based on 1-, 2-, and 5- acre disturbed area and for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. According to the SCAQMD LST methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. Since the daily disturbance area is below 1 acre, as a conservative analysis, the 1-acre LST thresholds were utilized for the construction LST analysis. As noted above, the closest sensitive receptors to the campus are the residential properties surrounding the campus, which are within 25 meters. These sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. **Table 4.3-4** shows the construction-related emissions with incorporation of SCAQMD Rules 402 and 403. It is noted that the localized emissions presented in **Table 4.3-4** are less than those in **Table 4.3-2**, since localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As seen in **Table 4.3-4**, on-site emissions with SCAQMD rules applied would not exceed the LSTs for SRA 2. As such, the Proposed Project would result in less than significant impacts related to the construction LST.

TABLE 4.3-4 LOCALIZED SIGNIFICANCE OF CONSTRUCTION EMISSIONS

Source	Pollutant (pounds/day)[2,3]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Phase 1 [2]	12.87	13.84	3.00	1.77
Phase 2 [3]	8.66	13.72	0.38	0.33
Phase 3 [3]	7.94	12.92	0.38	0.31
Phase 4 [3]	8.66	13.72	0.42	0.34
Phase 5 [4]	5.05	14.27	0.16	0.13
Maximum Daily Emissions	12.87	14.27	3.00	1.77
Localized Significance Threshold[1]	103	562	4	3
Thresholds Exceeded?	**No**	**No**	**No**	**No**

Notes:

1. The Localized Significance Threshold was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO_X, CO, PM10, and PM2.5. The Localized Significance Threshold was based on the anticipated daily acreage disturbance during grading phase for construction (approximately 0.5 acre; therefore, 1-acre thresholds were conservatively used), the distance to sensitive receptors (surrounding the Proposed Project's site; therefore 25-meter thresholds were used), and the source receptor area (SRA 2).

2. Maximum on-site emissions occur during grading phase for NO_X, PM10, and PM2.5 in Phase 1. Maximum on-site CO emissions occur during demolition phase in Phase 1.

Notes, continued:

3. Maximum on-site emissions occur during demolition phase for NO_X, CO, PM10, and PM2.5 in Phases 2, 3, and 4.

4. Maximum on-site emissions occur during demolition phase for NO_X, CO, and PM10 in Phase 5. Maximum on-site PM2.5 emissions occur during grading phase in Phase 5.

5. The maximum daily construction emissions includes fugitive dust control measures required by SCAQMD Rule 403, which includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table are shown in Appendix A.

Refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data, for detailed model input/output data.

Operations

According to SCAQMD LST methodology, LSTs would apply to operational activities if the Proposed Project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Proposed Project does not include such uses. Thus, due to the lack of such emissions, no long-term LST analysis is warranted. Operational LST impacts would be less than significant.

Toxic Air Contaminants

As noted above, implementation of the Proposed Project would not result in long-term operation of any stationary sources of toxic air contaminants (TACs). However, construction of the Proposed Project may result in temporary increases in emissions of diesel particulate matter (DPM) associated with the use of off-road diesel equipment. Health-related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. As such, the calculation of cancer risk associated with exposure to TACs is typically calculated based on a long-term (e.g., 70-year) period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. For these reasons, exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 10 in one million). As such, impacts from TACs would less than significant.

Carbon Monoxide Hot Spots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The Basin is designated as an attainment/maintenance area for the federal CO standards and an attainment area for state standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased. Nationwide, estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions.[6] CO emissions have continued to decline since this time. The Basin was redesignated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*.[7] The locations selected for microscale

[6] United States Environmental Protection Agency, *Carbon Monoxide Emissions*, https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10#:~:text=Almost%20the%20entire%20emissions%20reduction,nation's%20total%20anthropogenic%20CO%20emissions, accessed August 6, 2022.

[7] The CO Plan was not updated as part of the 2016 AQMP.

modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations. Thus, CO analysis in the CO Plan is utilized in a comparison to the Proposed Project, since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm 1-hour CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hot spots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hot spots would not be experienced at any intersections near the Proposed Project's site as the Project is not expected to generate any additional vehicle trips. Therefore, the Proposed Project's impacts would be less than significant pertaining to CO hot spots.

Conclusion

In conclusion, the Proposed Project would not result in significant air quality impacts on sensitive receptors. As discussed above, the Proposed Project would result in emissions that fall below the SCAQMD construction and operational LSTs. As such, the Proposed Project would result in a less than significant air quality impact.

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

Less than Significant Impact. According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Proposed Project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the Proposed Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short term in nature and cease upon the Proposed Project's completion. In addition, the Proposed Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce detectable odors from heavy-duty equipment exhaust. As such, the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and impacts would be less than significant.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 US Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Overview

The Proposed Project's site is in a fully urbanized, built-out area of the City of Santa Monica. The area surrounding the Project site is developed with single- and multi-family housing. No parks or areas of open space exist adjacent to the Proposed Project. The nearest park, Douglas Park, is located approximately 0.25 miles southeast. The nearest natural open space area is the Santa Monica Mountains, approximately 1.7 miles northwest.

The Proposed Project would occur within the boundaries of the existing Franklin Elementary School campus, which has been developed and used for school-related activities since its original construction in 1924. The school is located in a neighborhood and is immediately surrounded by single- and multi-family residences. The school campus contains grass on the front lawn and on the athletic field, and several mature landscaping trees, mostly along the school frontage at Montana Avenue and along Idaho Avenue.

Native and introduced wildlife species that are tolerant of human activities also thrive in urban biological communities. Wildlife species that occur in these areas typically include introduced species adapted to human habitation, including rock pigeon (*Columba livia*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), house mouse (*Mus musculus*), and Norway rat (*Rattus norvegicus*). Some native species that may occur in urban areas include American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), common barn own (*Tyto alba*), red-tailed hawk (*Buteo jamaicensis*), western fence lizard (*Sceloporus occidentalis*), Brewer's blackbird (*Euphagus cyanocephalus*), and house finch (*Carpodacus mexicanus*).

Special-Status Species

Special-status plant and wildlife species are those that are afforded special recognition by federal, state, or local resource agencies or organizations. Special-status species are of relatively limited distribution and generally require specialized habitat conditions. Special-status species are defined as:

- Listed, proposed, or candidate for listing under the state or federal Endangered Species Acts
- Protected under other regulations [e.g., local policies, Migratory Bird Treaty Act (MBTA)]
- California Department of Fish and Wildlife Species of Special Concern and California Fully Protected Species
- Listed as species of concern (List 1B, 2, or 3 plants) by the California Native Plant Society
- Species that receive consideration during environmental review under CEQA

The potential for special-status species to occur within the Proposed Project's site or be adversely impacted by the Proposed Project was evaluated based on the site conditions and the Project description. Given the disturbed and urban nature of the Proposed Project's site, the Proposed Project's site does not support suitable habitat for any special-status species.

Discussion of Impacts

4.4-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 US Fish and Wildlife Service?

Less than Significant Impact. The Proposed Project's site is currently fully developed with educational facilities and located in an urban setting that does contain some open space and mature trees. Due to the developed nature of the Proposed Project's site and vicinity, the vegetation and animal species supported in the limited ornamental, non-native landscaping include species that are commonly found in urban environments. The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) shows that there have been endangered, rare, or threatened species identified in the Beverly Hills Quadrangle (in which the Proposed Project's site is located) (CDFW 2022); however, the Proposed Project's site contains neither any Critical Habitat, as delineated by the United States Fish and Wildlife Service (USFWS) nor does it contain the habitat necessary to support any of the listed species (USFWS 2022a).

Given the fully disturbed nature of the Proposed Project's site, there is limited potential for the presence of special-status species at the site, and impacts would be less than significant.

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

No Impact. The Proposed Project's site is currently developed and located in an urban residential setting; it does not contain any riparian habitat or other natural habitat as designated by the CDFW and USFWS. The Proposed Project would not have an effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS. Therefore, no riparian habitats or natural communities would be impacted.

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

No Impact. The Proposed Project would not impact federally protected wetlands as defined by Section 404 of the Clean Water Act (e.g., marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means. The Proposed Project's site is currently developed and located in an urban setting and does not contain any wetlands identified by the National Wetlands Inventory (USFWS 2022b). The nearest estuarine and marine wetland to the Proposed Project's site is located approximately 1.8 miles to the southwest in the Pacific Ocean. Therefore, no impact would occur.

4.4-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?

Less than Significant Impact. Implementation of the Proposed Project would not interfere 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. The Proposed Project's site is an existing school, located in an urban residential environment; it does not contain any watercourse, greenbelt, or open space for wildlife movement, nor does it provide appropriate habitat for plants or wildlife. The Proposed Project may remove several landscaping and shade, ornamental, non-native trees within the school campus; however, no sensitive tree species would be removed.

Landscaped trees and shrubs and residential structures present within the Proposed Project's area may provide nesting habitat for native bird and raptor species protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code sections 3503 et seq. Construction activities would be required to comply with the MBTA to ensure that nesting bird surveys would be conducted prior to the start of construction activities that may occur during nesting season (February 1 through August 31). Per the MBTA requirements, a qualified biologist would conduct a nest survey within one week prior to the commencement of construction to ensure that no active nests would be lost. If an active nest is located, then the nest should be

flagged and construction within 300 feet (500 feet for raptors) of the nest should be postponed until the biologist has confirmed that the nest is no longer active.

The Proposed Project would also comply with the City of Santa Monica tree protection ordinance (SMMC Section 7.40), which requires that any tree, shrub, or plant in any street, park, boulevard, or public place in the City must be protected against damage during the repair, alteration, or construction of a building. Although existing trees may be removed from the campus, the Proposed Project's site is not considered to be a public place in the SMMC. The Proposed Project's implementation would require removal of one existing tree within the public parkway, located just outside of the school property boundary, in order to accommodate a proposed fire access lane. However, the Proposed Project's compliance with the MBTA and SMMC requirements would ensure a less than significant impact to migratory wildlife species.

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

Less than Significant Impact. The City of Santa Monica has a tree protection ordinance (noted above under Response 4.4-d) that applies to trees within City public property. Public schools are not considered public property under the SMMC. Therefore, the City's ordinance does not apply. However, SMMUSD is committed to taking the necessary measures to protect and preserve the campus urban forests wherever possible. Because the trees that may be potentially removed within the school campus are not protected by a preservation policy or an ordinance the impacts of tree removal and/or relocation would be less than significant.

4.4-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?

***No Impact*.** The campus is in an urban area that contains some open space and mature trees. However, no natural community or habitat conservation plans apply to the campus. As such, implementation of the Proposed Project would have no potential to affect such plans. No impact would occur in this regard.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
CULTURAL RESOURCES. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

This section is based, in part, on the Historic Resources Inventory (HRI) Report dated August 2022, and the Historical Resources Technical Report, dated October 2022, prepared for the Proposed Project by Architectural Resources Group (ARG). Refer to Appendices B-1 and B-2, respectively.

Overview

Portions of Franklin Elementary School were initially constructed as early as 1924. Based on the City of Santa Monica's HRI process from 1993, 2007, 2008, and 2016, Franklin Elementary School was identified as potentially eligible for local designation as an individual resource. As discussed in the Historic Resources Inventory Report (ARG 2022a; see Appendix B-1), Franklin Elementary School as a whole does not appear eligible for federal, state, or local listing. However, Building B (Main Building), which is the original campus building from 1936 (renovated in 1952) and the historical anchor of the Franklin Elementary School campus, appears to be individually eligible for listing in the California Register of Historical Resources (CRHR or California Register) and for local (City of Santa Monica) listing. Building B is associated with important patterns of history related to Santa Monica's civic and institutional development, and is also a good example of Public Works Administration Moderne architecture and a singularly significant work of master architects Marsh, Smith, and Powell. The evaluation of the historic resources on the school campus also included the lawn immediately north of the Main Building. Interior spaces associated with the Main Building have been extensively modified over time and were determined to lack integrity (ARG 2022a).

Discussion of Impacts

4.5-a Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5?

Less than Significant Impact. According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

As discussed above, the original campus building (Main Building) on the Franklin Elementary School site was evaluated for historical significance and determined to be individually eligible for listing in the CRHR and for local (City of Santa Monica) listing. The evaluation also included the lawn at the front (north) of the site. No other buildings or site features located on the campus satisfy the definition of a historical resource for purposes of CEQA (ARG 2022a).

The Proposed Project does not include demolition or any exterior changes to the Main Building. Demolition activity is limited to eight existing portable buildings, two existing modular buildings, and one permanent building (Building F), none of which are historical resources. The Main Building, including its associated landscape, would be retained during all phases of the Proposed Project. The Proposed Project would result in some alterations to the Main Building during Phase 3, which would involve interior renovations on the first floor of the building. However, such alterations would be limited to interior spaces. As discussed above, interior spaces in the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. The alterations proposed as part of Phase 3 would not materially impair those physical characteristics that convey the significance of the resource. Therefore, the Main Building would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark following the Proposed Project's implementation.

Additionally, new buildings and outdoor spaces, including the Maker-Space building, classroom building, and cafeteria and culinary education building would not require the demolition or alteration of the Main Building. The Maker-Space building and the replacement cafeteria/culinary arts building would be physically separated from the Main Building and would be located at a considerable distance behind the historical resource. The replacement classroom building would be two stories tall, similar to the Main Building, and would read as a more visually prominent component of the campus than the existing one-story buildings. However, the new classroom building would primarily be located on the eastern side of the campus, whereas the Main Building occupies a prominent central location at the front (north) of the campus and would continue to read as a focal point of the campus as well as its primary entrance. Further, the new classroom building would result in some changes to the immediate setting of the Main Building by introducing additional massing adjacent to the historical resource, but would not compromise the important spatial relationship that historically and currently exists between the Main Building and Montana Avenue. The sequence of entry from the street, through the lawn, and to the entrance of the Main Building would remain intact. Additionally, the new classroom building would not be physically attached to the Main Building. The Main Building would continue to retain its integrity of setting at the Proposed Project's completion. Refer to Appendix B-2 for additional discussion.

For the reasons stated above, the Proposed Project, as designed, would not result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5. Impacts in this regard would be less than significant.

4.5-b Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

***Less than Significant Impact with Mitigation Incorporated*.** The campus is a developed site, located within an urbanized residential portion of the City of Santa Monica. Construction of each phase of the Proposed Project would generally involve demolition of some existing on-site structures, followed by minor grading and foundation work, building construction and/or renovation, and architectural coating. Unanticipated and accidental archaeological discoveries are possible during the Proposed Project's construction, particularly during grading or excavation for new building foundations, which could have the potential to impact unknown archaeological resources. While the potential for discovery of unknown archaeological resources is considered low due to the maximum anticipated depth of excavation of six feet and the developed nature of the site (which likely contains engineered fill below the ground surface), unanticipated and accidental archaeological discoveries may be potentially significant. Therefore, the Proposed Project would implement mitigation measure **CUL-1**, which requires a Qualified Archaeologist to conduct sensitivity training in advance of ground-disturbing activities for each phase and to be retained and available during the Proposed Project's ground disturbance. It also provides measures to be taken in the event cultural resources are inadvertently discovered during the Proposed Project's construction. With implementation of mitigation measure **CUL-1,** impacts to archaeological resources would be reduced to less than significant.

Mitigation Measure:

CUL-1 Prior ground-disturbing activities for the Project (for each individual phase of the Project), the District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the Project and shall be on-call during all grading that would exceed a depth of 5 feet. The Qualified Archaeologist shall ensure that the following measures are followed for the Project:

- Prior to any grading activities that would exceed a depth of 5 feet, the Qualified Archaeologist, or their designee, shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural (prehistoric and historic) resources. As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural resources be made during construction.

- In the event that unanticipated cultural material is encountered during any phase of project construction, all construction work within 100 feet of the find shall cease and the Qualified Archaeologist shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the Qualified Archaeologist, work shall be permitted to continue in the area.

- If a find is determined to be important by the Qualified Archaeologist, he or she shall immediately notify the District. The District shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible

for inclusion in the California Register of Historical Resources. Work may not resume within the no-work radius (to be determined and established by the Qualified Archaeologist) until the lead agency, through consultation as appropriate, determine that the site either: (1) is not eligible for the California Register of Historical Resources; or (2) that the treatment measures have been completed to their satisfaction.

Level of Significance: Less than significant with mitigation incorporated.

4.5-c Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The campus is developed and has been used for school-related activities since 1924. No known burial sites are located within the Proposed Project's site and the area has been previously disturbed by development. In the unlikely event human remains or funerary objects are discovered during the Proposed Project's related ground disturbing activities, 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 County 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 County 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. Compliance with existing law regarding the discovery of human remains would ensure that the Proposed Project's potential impacts to human remains would be less than significant.

4.6 ENERGY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Overview

Regulatory Framework

State of California

Senate Bill 100. Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, 60 percent by December 31, 2030, and 100 percent by December 31, 2045. The bill requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and all other state agencies to incorporate that policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and other state agencies to utilize programs authorized under existing statutes to achieve that policy and, as part of a public process, issue a joint report to the legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of the policy.

California Building Energy Efficiency Standards (Title 24). The 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2020. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under 2019 Title 24 standards, nonresidential buildings will use about 30 percent less energy, mainly due to lighting upgrades, when compared to those constructed based on 2016 Title 24 standards.[8] The standards offer developers better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards. The California Green Building Standards (California Code of Regulations, Title 24, Part 11, commonly referred to as CALGreen) is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green

[8] California Energy Commission. 2018. *2019 Building Energy Efficiency Standards*. December 2018.

building standards in an effort to meet the goals of California's landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHGs) to 1990 levels by 2020. CALGreen was developed to: (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. The 2019 CALGreen code went into effect on January 1, 2020. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation, and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[9]

California Public Utilities Commission Energy Efficiency Strategic Plan. The CPUC prepared an Energy Efficiency Strategic Plan (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and a reduction in GHGs. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single road map to achieving maximum energy savings in the state between 2009 and 2020, and beyond 2020. The Strategic Plan contains the practical strategies and actions to attain significant statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the following four strategies:

1. All new residential construction in California will be zero net energy by 2020.
2. All new commercial construction in California will be zero net energy by 2030.
3. HVAC will be transformed to ensure that its energy performance is optimal for California's climate.
4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report. In 2002, the California state legislature adopted SB 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

The CEC adopted the 2021 IEPR, Volume I, Volume II, and Volume IV on February 1, 2022, and Volume III on February 24, 2022.[10] The 2021 IEPR provides information and policy recommendations on advancing a

[9] U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings. Accessed August 11, 2022.

[10] California Energy Commission. *Final 2021 Integrated Energy Policy Report.* https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report. Adopted February 2022. Accessed July 7, 2022.

clean, reliable, and affordable energy system for all Californians.[11] Volume I of the 2021 IEPR addresses actions needed to reduce the GHG emissions related to the buildings in which California live and work, with an emphasis on energy efficiency; Volume II examines actions needed to increase the reliability and resiliency of California's energy system; Volume III looks at the evolving role of gas in California' energy system; and Volume IV reports on California's energy demand outlook, including a forecast to 2035 and long-term energy demand scenarios of 2050. The 2021 IEPR builds on the goals and work in response to AB 758 (Energy: energy audit), SB 350 (Clean Energy and Pollution Reduction Act), AB 3232 (Zero-emissions buildings and sources of heat energy), and the 2019 IEPR to further a comprehensive approach toward decarbonizing buildings in a cost-effective and equitable manner. For the 2021 IEPR, the CEC extends the forecast time frame to 15 years to coincide with several state goals that are planned for 2035 and improves methodologies to better quantify and predict the likelihood, severity, and duration of future extreme heat events.

Executive Order N-79-20. Executive Order N-79-20, issued September 23, 2020, directs the state to require all new cars and passenger trucks sold in the state to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the state will be zero-emission by 2045.

City of Santa Monica

The City of Santa Monica General Plan Housing Element includes policies and objectives to facilitate sustainable housing development and to maintain current energy conservation and production programs (Objectives 1.d and 1.e). This includes furthering the goals and targets set forth in three sustainability plans, including the Solar Santa Monica program which aims to provide solar energy on all feasible buildings by 2020. Additionally, the Santa Monica Municipal Code Article 8, *Building Regulations*, establishes the minimum building requirements through the administration and enforcement of the California Building Standards Code as adopted by the City. Provisions within Article 8 apply to the construction, alteration, moving, demolition, repair, site preparation, use, maintenance and occupancy of buildings, structures and building service equipment, and shall serve as the administrative, organizational and enforcement rules and regulations for the applicable codes and standards. These standards typically include specifications on building features that involve energy usage. However, as a state-owned facility, as are all public schools in California, construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan or Article 8 of the Municipal Code.

Santa Monica-Malibu Unified School District

Districtwide Plan for Sustainability

The District adopted the *Districtwide Plan for Sustainability* (Sustainability Plan) in March 2019 with the following objectives: providing a strategic road map for formalizing and uniting the District's many existing sustainability initiatives; incorporating sustainability into education services and all aspects of student learning; and integrating climate protection, resource efficiency, waste management, and other sustainability practices into District operations. The Sustainability Plan is organized into eight sustainability

[11] Ibid.

focus areas: Climate, Education + Engagement, Energy Efficiency + Renewables, Water, Solid Waste, Transportation, Food, Nutrition + Wellness, and Green Building + Operations. The Sustainability Plan establishes a framework for assessment and progress on each focus area by documenting baseline conditions, establishing key goals and performance indicators, highlighting current initiatives and best practices, recommending improvement strategies, and anticipating project costs and funding mechanisms. The Sustainability Plan concludes with recommendations for the resources, monitoring and reporting strategies, and public communication considerations needed to successfully implement a plan of this magnitude.

California Collaborative for High Performance Schools (CHPS) Criteria

The Collaborative for High Performance Schools (CHPS) began in November 1999, when CEC called together Pacific Gas and Electric Company, San Diego Gas and Electric, and Southern California Edison (SCE) to discuss the best way to improve the performance of California's schools. Out of this partnership, CHPS grew to include a diverse range of government agencies, utility companies, school districts, nonprofit organizations and private companies, all with a unifying goal: to improve the quality of educational facilities for California's children. When the first version of the CA-CHPS Criteria was released in late 2001, it was in anticipation of an unprecedented wave of new school construction that has since crested and retreated over the last few years of recession. The CHPS Criteria has always emphasized good indoor air quality, natural daylighting, and excellent acoustics.

Since 2004, CHPS has endeavored for the CHPS Criteria to be responsive to renovations/modernizations. It is more important with the passage of Proposition 39, which would be infusing $2.5 billion into energy efficiency retrofits for existing schools. With the current 2014 edition of the CA-CHPS Criteria, CHPS introduces the *High Performance Transition Plan* as a pathway for incremental improvement and recognition for schools that undertake a phased series of renovation/modernization projects that would not have enough scope to be recognized as a CHPS Verified or CHPS Designed project on their own.

Strategic Energy Management Plan

The District is participating in the Continuous Energy Improvement Program (CEI) in partnership with SCE and the Southern California Gas Company. CEI is a consultative service aimed at helping commercial customers engage in long-term, strategic energy planning. Subsequently, the District has partnered with consulting firm Ecova to develop an energy plan, establish energy goals and targets, and implement behavioral change programs. Through this program, the District developed a Strategic Energy Management Plan outlining its energy strategy and goals. As of this writing, the District has yet to formally adopt this plan.

Methodology

The following impact analysis focuses on the three sources of energy that are relevant to the Proposed Project: electricity and natural gas associated with the Proposed Project's operations and the fuel consumption for the Proposed Project's construction. It should be noted that as the Proposed Project does not involve increasing the school capacity, the Proposed Project is not expected to generate any additional vehicle trips during operations. The analysis of electricity and natural gas usage during the Proposed Project's operation is based on the California Emissions Estimator Model (CalEEMod) version

2020.4.0 modeling, which quantifies energy use for occupancy. The Proposed Project's estimated electricity and natural gas usage is based primarily on CalEEMod's default settings for Los Angeles County, and default consumption factors from the California Commercial End Use Survey database.[12] The results of the CalEEMod modeling are included in Appendix A, Air Quality, GHG Emissions, and Energy Data. The estimated construction fuel consumption is based on the Proposed Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The results of the modeling and construction fuel estimates are included in Appendix A.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis under Response 4.6-a relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- **Criterion 2**: The effects of the Project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3**: The effects of the Project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4**: The degree to which the Project complies with existing energy standards.
- **Criterion 5**: The effects of the Project on energy resources.
- **Criterion 6**: The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the Proposed Project's energy usage is presented and addresses Criterion 1. The discussion on construction-related energy use focuses on Criterion 2, 4, and 5. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses Criterion 2, 4, and 6, and the building energy demand analysis discusses Criterion 2, 3, 4, and 5.

Discussion of Impacts

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

***Less than Significant Impact*.** Estimated energy consumption resulting from the Proposed Project is summarized in **Table 4.6-1** and **Table 4.6-2**. As shown in **Table 4.6-1**, the Proposed Project's maximal construction fuel consumption would increase Los Angeles County's consumption by

[12] California Energy Commission. 2006. *California Commercial End-Use Survey Results*. https://www.energy.ca.gov/data-reports/surveys/california-commercial-end-use-survey. Accessed August 11, 2022.

0.0047 percent during Phase 4. It should be noted that while the Proposed Project would change a portion of the buildings and layout of the campus, the Proposed Project would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school; as such, the Proposed Project would not result in more vehicle trips to and from the school during operation when compared to existing conditions. In addition, the Proposed Project would not modify primary site access locations and traffic patterns—two factors that could potentially result in an increase in average trip lengths. As such, no increase to operational fuel consumption is anticipated. As shown in **Table 4.6-2**, the Proposed Project's energy usage during operations would constitute an approximate 0.0005 percent increase over Los Angeles County's typical annual electricity consumption and an approximate 0.0002 percent increase over Los Angeles County's typical annual natural gas consumption (**Criterion 1**).

TABLE 4.6-1 PROPOSED PROJECT AND COUNTYWIDE ENERGY CONSUMPTION DURING CONSTRUCTION

Construction Phase	Project Construction Fuel Consumption[1]	Los Angeles County Annual Fuel Consumption[2]	Percentage Increase Countywide
Phase 1	15,302	374,830,981	0.0041%
Phase 2	13,397	376,305,817	0.0036%
Phase 3	6,976	374,683,338	0.0019%
Phase 4	17,364	369,759,089	0.0047%
Phase 5	16,541	363,964,193	0.0045%

Source: Refer to Appendix A, Air Quality, GHG Emissions, and Energy Data.

[1] Proposed Project's fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2017 model.

[2] Each phase's increase in fuel consumption during construction is compared with the projected Countywide fuel consumption in the year when construction is projected to start: 2023 for Phase 1, 2025 for Phase 2, 2027 for Phase 3, 2029 for Phase 4, and 2031 for Phase 5; refer to Appendix A.

TABLE 4.6-2 PROPOSED PROJECT AND COUNTYWIDE ENERGY CONSUMPTION DURING OPERATION

Energy Type	Project Annual Energy Consumption[1]	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	298 MWh	65,649,878 MWh	0.0005%
Natural Gas Consumption	5,346 therms	2,936,687,098 therms	0.0002%

Source: Refer to Appendix A, Air Quality, GHG Emissions, and Energy Data.

[1] As modeled in CalEEMod version 2020.4.0.

[2] The Project's increases in electricity and natural gas consumption are compared to the total consumption in Los Angeles County in 2020, the most recent available consumption data. Los Angeles County electricity consumption data source: California Energy Commission, Electricity Consumption by County, http://www.ecdms. energy.ca.gov/elecbycounty.aspx, accessed August 8, 2022.

Los Angeles County natural gas consumption data source: California Energy Commission, Gas Consumption by County, http://www.ecdms.energy. ca.gov/gasbycounty.aspx, accessed August 8, 2022.

Construction-Related Energy

During construction, the Proposed Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in

construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during clearing, grading, building construction, paving, and architectural coatings. As indicated in **Table 4.6-1**, the maximal fuel consumption during any one phase of the Proposed Project's construction would be approximately 17,364 gallons (during Phase 4), which would result in a nominal increase (0.0047 percent) in fuel use in the County. As such, the Proposed Project's construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservation would occur during construction through compliance with state requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations section 2485). The Proposed Project's construction equipment would also be required to comply with the latest U.S. EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, since the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Proposed Project's characteristics that would necessitate the use of construction equipment, building materials, or methods that would be less energy efficient than at comparable construction sites in the region or state. Therefore, fuel energy and construction materials consumed during the Proposed Project's construction would not represent a significant demand on energy resources (**Criterion 5**).

Therefore, construction energy use would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature and a less than significant impact would result.

Operational Energy

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the

United States. It should be noted that the Proposed Project would shift the overall design of the campus and would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school; as such, the Proposed Project would not result in more vehicle trips to and from the school during operation when compared to existing conditions. In addition, the Proposed Project would not modify primary site access locations and traffic patterns—two factors that could potentially result in an increase in average trip lengths. In addition, the Proposed Project would install additional bike racks at each building to accommodate at least 10 percent of the regular building occupants. As such, no increase to operational fuel consumption is anticipated, and no unusual features that would result in excessive long-term operational fuel consumption are anticipated (**Criterion 2** and **Criterion 6**). Therefore, fuel consumption associated with vehicle trips generated by the Proposed Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region and a less than significant impact would result.

Building Energy Demand

The CEC developed 2020 to 2035 forecasts for energy consumption and peak demand in support of the 2021 IEPR for each of the major electricity and natural gas planning areas and the state based on the economic and demographic growth projections.[13] CEC forecasts that the statewide annual average growth rates of energy demand between 2021 and 2030 would be 1.3 percent to 2.3 percent for electricity and less than 0.1 percent to 0.8 percent increase for natural gas.[14] As shown in **Table 4.6-2**, operational energy consumption of the Proposed Project would represent approximately 0.0005 percent increase in electricity consumption and approximately 0.0002 percent increase in natural gas consumption over the current Countywide usage, which would be substantially below the CEC's forecasts and the current Countywide usage. Therefore, the Proposed Project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the Proposed Project would consume energy during the same time periods as other commercial developments and would consume energy during normal business hours. As a result, the Proposed Project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

According to the District, the Proposed Project would adhere to and exceed the most current CHPS Criteria by 25 percent. It should be acknowledged that standards under 25 percent exceedance to CHPS Criteria would be more stringent than those under the 2019 Title 24 in regard to building energy usage. However, due to the speculative nature of the Proposed Project's specifics in this stage of development, 2019 Title 24 standards were assumed and modeled in CalEEMod for building characteristics to be conservative. Therefore, **Table 4.6-2** provides a conservative analysis, utilizing energy consumption rates for buildings constructed under 2019 Title 24 standards. The 2019 Title 24 standards provide minimum efficiency standards related to

[13] California Energy Commission. 2022. *Final 2021 Integrated Energy Policy Report Volume IV - California Energy Demand Forecast.* https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report. Adopted February 2022. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Figure 10 and Figure 14, respectively, of the report. Accessed July 7, 2022.

[14] Ibid.

various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of these standards significantly reduce energy usage (for example, the 2019 Title 24 standards require an energy usage reduction of 30 percent for nonresidential uses compared to the 2016 standards) for newly constructed buildings. The Title 24 Building Energy Efficiency Standards are updated every three years and become more stringent at each update. As such, complying with the most recent Title 24 standards would ensure any structure renovated or built under the Proposed Project would be more energy efficient than existing buildings built under the earlier versions of the Title 24 standards (**Criterion 4**).

Furthermore, SCE, the electricity provider, is subject to California's Renewables Portfolio Standard reflected in SB 100. The Renewables Portfolio Standard requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources that are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. It should be noted that all proposed buildings would have solar-compatible roofs. Further, according to the District, Franklin Elementary School is currently procuring 36 percent of total energy demand from renewable energy sources. The increase in reliance of such energy resources further ensures that new development projects would not result in the waste of finite energy resources (**Criterion 5**).

Therefore, the Proposed Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during the Proposed Project's operation, or preempt future energy development or future energy conservation, and a less than significant impact would result.

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

***Less than Significant Impact*.** The Proposed Project would comply with all applicable program missions and recommended strategies identified in the District's Sustainability Plan for reducing energy usage and implementing energy efficiency; refer to **Table 4.6-3**. Specifically, the recommended strategies for the energy efficiency program address the findings and recommendations from the District's energy audits and program assessments and are aligned with the District's Strategic Energy Management Plan. They also include recommendations for education and training programs needed to maintain efficiency over time. As such, these strategies provide a comprehensive road map for energy conservation, efficiency, and renewable energy programs across the District.

Additionally, compliance with Title 24 and CALGreen standards would ensure the Proposed Project incorporates energy-efficient windows, insulation, lighting, ventilation systems, and water-efficient fixtures in all new structures. Adherence to the Title 24 energy requirements will ensure conformance with the state's goal of promoting energy and lighting efficiency. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

TABLE 4.6-3 DISTRICTWIDE PLAN FOR SUSTAINABILITY CONSISTENCY ANALYSIS

Recommended Strategies	Proposed Project's Consistency
ENERGY EFFICIENCY + RENEWABLES Program Mission: Minimize the use of energy resources, convert to clean, renewable energy sources, and redirect financial resources towards student learning and sustainability initiatives. **Goal for 2020:** • Reduce energy consumption by 20% compared to 2017-18 baseline. • Generate 20% of the District's electrical need from solar. • Transition all District sites to 100% renewable electricity through the Santa Monica and Malibu Clean Power Alliance. **Goal for 2025:** • Reduce energy consumption by 25% compared to 2017-18 baseline. • Generate 30% of the District's electrical need from solar. **Goal for 2030:** • Reduce energy consumption by 30% compared to 2017-18 baseline. • Generate 35% of the District's electrical need from solar.	
Continue to install occupancy sensors in all classrooms and offices to allow lights to be shut off when unoccupied.	**Consistent**. All proposed indoor spaces on-site would install occupancy sensors.
Establish lighting and equipment efficiency standards for all new equipment that meet or exceed Title 24 standards.	**Consistent**. Although this strategy does not mean to be implemented directly by any individual project, all lighting and appliances of the Proposed Project would meet or exceed the most recent Title 24 standards. According to the District, the Proposed Project would adhere to and exceed the most current CHPS Criteria by 25 percent. It should be acknowledged that standards under 25 percent exceedance to CHPS Criteria would be more stringent than those under 2019 Title 24 in regard to building energy usage. However, due to the speculative nature of the Proposed Project's specifics in this stage of development, 2019 Title 24 standards were assumed and modeled in CalEEMod for building characteristics to be conservative.
Install solar PV on the District sites included in the solar Phase 1 project scope.	**Consistent**. All proposed buildings would have solar-compatible roofs. It should be noted that if solar panels are not installed in the future, the District would achieve a higher tier of sustainable energy; the District currently receives a lean power rate, which is comprised of 36 percent clean energy.
Install Title 24 compliant or better HVAC units for District sites that require cooling.	**Consistent**. All proposed buildings would install the most recent Title 24 compliant or better HVAC units.
Install wireless thermostats for new HVAC units to allow District to implement energy saving strategies, such as thermostat lockout temperatures and occupied/ unoccupied scheduling.	**Consistent**. All proposed buildings would install Pelican Wireless thermostats that would be compatible with any District-implemented energy management strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling.

TABLE 4.6-3, CONTINUED

Recommended Strategies	Proposed Project's Consistency
Install energy management systems (EMS) for remaining school sites (existing EMS at Santa Monica High School and Edison) to allow control at both the site and District level. Connect wireless thermostats to the EMS system.	**Consistent**. As discussed above, all proposed buildings would install Pelican Wireless thermostats that would be compatible with any District-implemented energy management strategies, such as connection between wireless thermostats to the EMS.
GREEN BUILDING + OPERATIONS Program Mission: Provide sustainable, healthy, and safe environments for the District community through the adoption of sustainable building design principals, construction methods, and operational practices that minimize environmental impact and maximize health. **Goal for 2020:** • All new buildings shall be designed to use ten percent (10%) less energy than the allowed energy budget established by the 2016 California Energy Code. • All new buildings and major renovations to achieve CHPS Verified™ and exceed the minimum CHPS Designed™ qualifying point count by 25%. • Adopt a Sustainable Purchasing Policy and Environmentally Preferable Purchasing (EPP) guidelines and develop sustainable purchasing goals in key product and service categories. **Goal for 2025** • Adopt CA Green Building Standards Chapter 11, Title 24 (CALGreen) Nonresidential Tier 2 Voluntary Measures as mandatory and incorporate into the District's Sustainability Design Guidelines. • All new buildings and major renovations to consider WELL Certification Silver. **Goal for 2030** • All new buildings to be Zero Net Energy (ZNE); and 50% of existing buildings to be retrofitted to ZNE. • All new buildings and major renovations to achieve CHPS Verified Leader™.	
Collaborative for High Performance Schools (CHPS) Green Building Resolution Standards.	**Consistent**. According to the District, the Proposed Project would adhere to and exceed the most current CHPS Criteria by 25 percent. It should be acknowledged that standards under 25 percent exceedance to CHPS Criteria would be more stringent than those under 2019 Title 24 in regard to building energy usage. However, due to the speculative nature of the Proposed Project's specifics in this stage of development, 2019 Title 24 standards were assumed and modeled in CalEEMod for building characteristics to be conservative.

Source: Santa Monica – Malibu Unified School District, Districtwide Plan for Sustainability, February 2019.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

This section is based, in part, on the Geotechnical Exploration Report prepared for the Proposed Project by Leighton Consulting, Inc., dated January 2022, and included as Appendix C.

Overview

The campus is in the Santa Monica Plain, an uplifted and inclined alluvial surface within the southwestern block of the Los Angeles Basin. The Los Angeles Basin, a structural trough, is a northwest-trending alluviated lowland plain approximately 50 miles long and 20 miles wide. Mountains and hills that generally expose Late Cretaceous to Late Pleistocene-age sedimentary and igneous rocks bound the Basin along the north, northeast, east, and southeast. The Basin is part of the Peninsular Ranges geomorphic province of California, characterized by subparallel blocks sliced longitudinally by young, steeply dipping northwest-trending fault zones. The Basin, located at the northerly terminus of the Peninsular Ranges, is the site of

active sedimentation and the strata are interpreted to be as much as 31,000 feet thick in the center of the synclinal trough of the Central Block.

According to the Geotechnical Exploration Report, artificial fill materials were encountered within the Proposed Project's site to a depth of approximately 2 to 4 feet below grade. The fill is characterized as dark brown to reddish brown sandy lean clay to silty clay with varying amounts of slaty gravel. As no documentation or records related to fill placement were available during the preparation of the report, all fill encountered on-site and anticipated in future explorations is considered undocumented and unsuitable for support of new improvements in its current condition. The artificial fill is underlain by Quaternary old alluvial fan deposits. These Pleistocene alluvial fan deposits encountered directly beneath the artificial fill generally consist of brown, dark grayish brown, and reddish brown silty clay and sandy clay locally channelized with sand and slaty gravels. In general, the fine-grained material ranges from very stiff to hard. The channelized coarse-grained soils consist of a series of fining upward sequences and range from medium dense to very dense.

Discussion of Impacts

4.7-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?

Less than Significant Impact. The Proposed is located within an Alquist-Priolo Earthquake Fault Zone. Specifically, according to the California Geological Survey (CGS), the Proposed Project's site is mapped within the Santa Monica Fault Zone (SMFZ), which was established by the CGS Fault Evaluation Report 259 dated June 28, 2017. The boundaries of the SMFZ are located approximately 580 feet north and 1,300 feet south of the Proposed Project's site. The fault itself is mapped by the CGS as crossing the southwestern corner of the Franklin Elementary School campus (Leighton 2022). Other several active and potentially active faults mapped within proximity to the Proposed Project's site include the Malibu Coast Fault (approximately 2.5 miles northeast), the Newport Inglewood Fault (approximately 5.4 miles east), the Hollywood Fault (approximately 5.4 miles northeast), and the Palos Verdes Fault (approximately 20 miles south).

In addition to reviewing geologic literature, Leighton conducted a subsurface exploration to evaluate soil conditions and perform a fault hazard evaluation. Based predominantly on the continuous-core boring and cone penetrometer test transect, Leighton's interpretation of subsurface stratigraphy shows multiple laterally continuous stratum extending across the Project footprint within the underlying Pleistocene-age alluvial fan deposits (Leighton 2022). Leighton concluded that active faults do not underlie the explored area, and therefore, the potential for surface fault rupture at the campus is considered low.

Notwithstanding, the Proposed Project would implement Leighton's geotechnical recommendations, which include criteria for soil excavation depths, satisfactory selection, placement and compaction of fill, reuse of demolished concrete and asphalt, etc., and

development would occur in accordance with 2022 California Building Code requirements.[15] Based on the above, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, such impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. Based on a historical seismicity search for a 62-mile radius surrounding the campus, the largest earthquake magnitude found in the search was the magnitude 7.7 earthquake, known as the Arvin-Tehachapi quake, which occurred on July 21, 1952, approximately 73 miles from the campus, producing an estimated peak ground acceleration (PGA) of approximately 0.05 units of gravity (g) at the site (Leighton 2022). The largest estimated PGA found in the search was approximately 0.23 g from the 1994 magnitude 6.7 Northridge earthquake, located approximately 12.5 miles north of the Proposed Project's site. Review of additional data publicly available from the Center for Engineering Strong Motion Data showed that a site located near the corner of 19th Street and Wilshire, approximately 0.5 miles southwest of the campus, experienced a PGA of 0.15 g from the March 17, 2014, magnitude 4.4 Encino earthquake. Another site located at Providence St. Johns Hospital, approximately 0.6 miles south of the campus, experienced a PGA of 0.03 g from the magnitude 5.4 Chino Hills earthquake on July 29, 2008, but did not report of any damage from earthquakes occurring over the last century. For context, the 2022 California Building Code provides site-specific seismic design parameters for PGA of 0.907 g (Appendix C), which would be adequate to withstand any projected seismic ground shaking. As the Proposed Project's site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many Southern California faults, the Proposed Project would implement Leighton's geotechnical recommendations as previously described, and development would occur in accordance with the 2022 California Building Code. Through compliance with these regulatory requirements and the utilization of appropriate seismic design, potential impacts relating to seismic shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

***Less than Significant Impact*.** Liquefaction is the loss of soil strength due to a buildup of excess pore-water pressure during strong and long-duration ground shaking. Liquefaction is associated primarily with loose (low density), saturated, relatively uniform fine- to medium-grained, clean cohesionless soils. As shaking action of an earthquake progresses, soil granules are rearranged and the soil densifies within a short period, which results in a buildup of pore-water pressure. Liquefaction then occurs when soil shear strength reduces abruptly and the loose sand and silt behaves like a liquid. Overall, for liquefaction to occur there must be: (1) loose, clean granular soils, (2) shallow groundwater, and (3) strong, long-duration ground shaking.

[15] The 2022 California Building Standards Code (Cal. Code Regs., Title 24) was published July 1, 2022, with an effective date of January 1, 2023.

The Beverly Hills Quadrangle Seismic Hazard Zone Map and the City of Santa Monica Geologic Hazards map indicate that the Proposed Project's site is not located within an area potentially susceptible to liquefaction. As previously described, the Proposed Project's site is underlain by stiff to hard clays interbedded with medium dense to dense sands and slaty gravels and groundwater is interpreted below a depth of 40 to 50 feet. Given these factors, the potential for liquefaction and lateral spreading to affect the campus is considered low. In addition, the potential seismically induced settlement at the site is estimated to be on the order of 0.5 inches or less. As such, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, such as liquefaction. Therefore, such impacts would be less than significant.

iv) Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Proposed Project's site and surrounding area are fully developed and characterized by relatively flat topography. As evaluated in the Geotechnical Exploration Report, the campus is not located in an area mapped as potentially susceptible to seismically induced landslides (Leighton 2022). No landslides are mapped or known to exist at the Proposed Project's site or vicinity, and the Proposed Project's site is not located adjacent to a significant slope. The potential for seismically induced landslides to affect the Proposed Project's site is considered low. The Proposed Project would conform with standard structural design requirements from the current building code. As such, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact related to landslides would occur.

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

***Less than Significant Impact*.** The Proposed Project's implementation would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. The potential for soil erosion would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities of each construction phase. Accordingly, the Proposed Project would comply with best management practices as required by the City of Santa Monica and per SMMC Section 7.10.100, including, but not limited to, a construction Stormwater Pollution Prevention Plan (SWPPP), Erosion and Sediment Control Plan, sediment removal, and plastic coverings for construction soils/materials. Following completion of the Proposed Project, the campus would be improved with structures, hardscape, landscaping, and appropriate drainage infrastructure. Therefore, with site-specific design features and compliance with City requirements, the Proposed Project's impacts related to sedimentation and erosion impacts would be less than significant.

4.7-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?

Less than Significant Impact. Based on geotechnical laboratory testing performed on selected samples, the soils on the campus are not susceptible to collapse. Furthermore, the potential for lateral spreading, liquefaction, and subsidence was addressed under Response 4.7-a(iii) and it was determined that related impacts would be less than significant. Therefore, the Proposed Project would not be located on soils that are unstable or that would become unstable as a result of the Proposed Project and related impacts would be less than significant.

4.7-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?

Less than Significant Impact. Expansive or shrink-swell soils are soils that swell when subjected to moisture and shrink when dry. Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. According to California Building Code section 1803A.5.3, expansive soils are those soils with an Expansion Index (EI) of 20 or greater. Based on testing of boring samples collected from the campus, the expansion properties of the soil below the Proposed Project's range from EI 21 to 50, which indicates that expansion is considered to be low. Nonetheless, as the clayey nature of the near-surface soils expansion potential is anticipated to vary, additional testing of soils, as recommended in the geotechnical study (Appendix C) upon completion of grading should be performed to confirm the results of the initial testing. As such, the soils lying below the campus would be identified and evaluated as to appropriate design considerations for the Proposed Project. As recommended by Leighton, any required import material should consist of relatively non-expansive soils with a very low EI (< 20). All proposed import materials should be approved by the geotechnical engineer of record prior to being placed at the site. Therefore, the Proposed Project would not be located on expansive soil, and impacts related to expansive soils would be less than significant.

4.7-e Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. As the campus is in an urbanized area served by existing wastewater infrastructure, no septic tanks or alternative wastewater disposal systems would be required. As such, the Proposed Project would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur.

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

Less than Significant Impact with Mitigation Incorporated. Paleontological resources are defined as fossilized remains of vertebrate and invertebrate organisms, fossil tracks and trackways, and plant fossils. A unique paleontological site would include a known area of fossil-bearing rock strata.

Paleontological resources are classified as nonrenewable scientific resources and are protected by state statute (PRC Section 5097.5, Archaeological, Paleontological, and Historical Sites). No state or local agencies have specific jurisdiction over paleontological resources; however, all must evaluate potential impacts and provide any applicable mitigation measures. No state or local agency requires a paleontological collecting permit to allow for the recovery of fossil remains discovered as a result of construction-related earth moving on state or private land in a project area.

Impacts on paleontological resources occur when excavation activities encounter fossiliferous geological deposits and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formation, and geologic formations with the potential for containing fossil remains are considered paleontological resources or have the potential to be paleontological resources. Fossil remains are considered important if they are (1) well preserved; (2) identifiable; (3) type/topotypic specimens; (4) age diagnostic; (5) useful in environmental reconstruction; and/or (6) represent new, rare, and/or endemic taxa.

The potential for impacts to paleontological resources to occur depends upon the sensitivity of underlying geologic units and is further influenced by the extent and depth of grading and excavation activities. No known paleontological resources exist within the Proposed Project's area. However, the Proposed Project's site is underlain by Quaternary old alluvial fan deposits (Leighton 2022) which are considered to have a high sensitivity for paleontological resources . It is anticipated that maximum excavation to allow for the proposed improvements would extend approximately six feet below ground surface. Therefore, the potential exists for unanticipated discovery of paleontological resources during ground-disturbing activities which may result in damage or destroy paleontological resources that may be present below the ground surface.

To ensure that potential effects on unknown paleontological resources are minimized or avoided during the Proposed Project's ground disturbing activities (e.g., grading and/or excavation), implementation of mitigation measures **GEO-1** and **GEO-2** would be required. With implementation of such mitigation, impacts would be reduced to less than significant.

Mitigation Measures:

GEO-1 **Preconstruction Meeting.** A qualified professional paleontologist shall provide a preconstruction meeting for all construction workers who shall be disturbing the ground in the Project area. The preconstruction meeting shall cover paleontological resources sensitivity, safety, and next steps if a resource is identified.

GEO-2 **Paleontological Construction Monitoring.** A qualified professional paleontological monitor shall monitor all Project-related ground disturbing activities exceeding a depth of 5 feet below ground surface in the affected area. If a paleontological resource is identified, the paleontological monitor shall assess the find to determine if it is significant. If it is significant, the resource shall require documentation and curation.

4.8 GREENHOUSE GASES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
GREENHOUSE GASES. Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☐	☐	☒	☐

Overview

Since the early 1990s, scientific consensus has held that the world's population is releasing greenhouse gases (GHG) faster than the earth's natural systems can absorb them. These gases are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through but traps heat at the surface preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH_4 traps over 21 times more heat per molecule than CO_2, and N_2O absorbs 310 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e), which weight each gas by its global warming potential. Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

Global Climate Change

California is a substantial contributor of global GHGs, emitting over 418.2 million metric tons of carbon dioxide equivalent ($MTCO_2e$) per year.[16] CH_4 is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which increases the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is required to reduce the rate of GHG emissions enough to slow or

[16] California Air Resources Board. *California Greenhouse Gas Emissions for 2000 to 2019.* https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf. Accessed July 25, 2022.

stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and N_2O from before the start of industrialization (approximately 1750) to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of July 2022, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 418 ppm.[17]

Regulatory Setting

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm CO_2e concentration is required to keep global mean warming below two degrees Celsius (˚C), which in turn is assumed to be necessary to avoid dangerous climate change.

Various statewide and local initiatives to reduce the state's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

State

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code, Sections 38500 – 38599), which establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;

[17] Scripps Institution of Oceanography. n.d. *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/. Accessed July 25, 2022.

- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Senate Bill 32. Signed into law in September 2016, SB 32 codifies California's 2030 GHG reduction target of 40 percent below 1990 levels by 2030. The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

California Building Energy Efficiency Standards (Title 24). In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Under the 2019 Title 24 standards, nonresidential buildings would use about 30 percent less energy (mainly due to lighting upgrades) when compared to 2016 Title 24 standards.[18] The standards require installation of energy efficient windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Green Building Standards (CALGreen). The CALGreen Code (California Code of Regulations, Title 24, Part 11) is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt, which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2019 and went into effect on January 1, 2020. CALGreen requires new buildings to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials.

CARB Scoping Plan. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies to reduce CO_2e emissions by 174 million MT, or approximately 30 percent, from the state's projected 2020 emissions level of 596 million $MTCO_2e$ under a business as usual (BAU) scenario.[19] This is a reduction of 42 million $MTCO_2e$, or almost 10 percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial). CARB used three-year

[18] California Energy Commission. *2019 Building Energy Efficiency Standards.* March 2018.

[19] "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The 2014 Scoping Plan identifies the actions California had already taken to reduce GHG emissions and focused on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The 2014 Scoping Plan update also looked beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observed that "a mid-term statewide emission limit will ensure that the state stays on course to meet our long-term goal."

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan). This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the updated 2017 Scoping Plan draws on a decade of successful programs that address the major sources of climate changing gases in every sector of the economy.

Regional

Southern California Association of Governments (SCAG). On September 3, 2020, SCAG adopted the *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specifically, these strategies are:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the state-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

Local

City of Santa Monica

The construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan. Per Government Code Section 53094, on January 1, 2019, the SMMUSD School Board passed a Resolution to be exempted from the Sustainable City Plan from City of Santa Monica General Plan and zoning ordinance provisions. As such, the discussion of the City's General Plan, Sustainable City Plan, and Climate Action and Adaptation Plan is provided below as background information.

Santa Monica Sustainable City Plan

The City Council adopted the Santa Monica Sustainability City Program in 1994. The change in name from Sustainability City Program to Sustainable City Plan (SCP) was made to better reflect the long-term comprehensive natural of Santa Monica's vision and the community's efforts to become a sustainable city. The recent update to SCP is January 14, 2014. To assess progress on meeting citywide goals, nine target areas were identified: resource conservation, environmental and public health, transportation, sustainability local economy, open space and land use, housing, community education and civic participation, human dignity, and arts and culture. For each target area, numerical indicators were developed to help the City achieve each goal by 2020. As the Proposed Project would be constructed and operated post-2020, the SCP was not utilized for consistency analysis.

Santa Monica Climate Action and Adaptation Plan

The City's Climate Action and Adaptation Plan (CAAP) builds off of its success and legacy as a sustainable community to move closer to carbon neutrality, by establishing an interim goal of reducing carbon emissions 80 percent below 1990 levels by 2030. The CAAP is the product of collaboration and engagement with the public, businesses, stakeholder groups, and subject matter experts from academia, industry and interdepartmental staff representatives. The CAAP focuses on eight objectives in three sectors to reduce emissions: Zero Net Carbon Building, Zero Waste, and Sustainable Mobility. The CAAP also lays out a framework for increasing Santa Monica's resilience to climate change through four sectors: Climate Ready Community, Water Self-Sufficiency, Coastal Flooding Preparedness and Low Carbon Food & Ecosystems.

The CAAP is not an element of the City's General Plan or a regulatory document for the purposes of streamlining the CEQA process. As such, the CCAP was not utilized for consistency analysis.

Santa Monica General Plan Land Use and Circulation Element

The City's General Plan Land Use and Circulation Element (LUCE) is intended to achieve a sustainable and integrated system of land use and transportation in Santa Monica within the larger context of the greater Los Angeles metropolitan area. An important principle of the LUCE is to create a more sustainable Santa Monica by providing the framework to achieve the GHG reduction goals of the Sustainable City Plan. The LUCE addresses GHG emissions through its land use and transportation decisions such as focusing new land uses near transit, creating complete neighborhoods, supporting infill mixed-use projects, and providing affordable and diverse housing near jobs and transit.

Santa Monica-Malibu Unified School District

Districtwide Plan for Sustainability

The District adopted the Districtwide Plan for Sustainability on March 21, 2019, which provides a strategic roadmap for formalizing and uniting the District's many existing sustainability initiatives; incorporating sustainability into Education Services and all aspects of student learning; and integrating climate protection, resource efficiency, waste management, and other sustainability practices into District operations. In order to track and assess the District's progress toward sustainability over time, the District has documented baseline conditions in the Districtwide Plan for Sustainability and for each sustainability

focus area (energy efficiency and renewables, water, solid waste, and transportation) has identified performance indicators in the following: electrical consumption; natural gas consumption; energy use intensity; on-site solar production; percent on-site solar production; water used; total waste generation; diversion from landfill; drive alone rate; and staff average vehicle ridership. The performance indicators are applied across the District as a whole, which will allow the District to quantify the cumulative climate benefits of its sustainability program and will also provide the District with a mechanism for benchmarking against peers and aligning its goals with state, federal, and international climate goals. The Districtwide Plan for Sustainability identifies the goal for the District to adopt a Districtwide Climate Action Plan by 2025.

Thresholds of Significance

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends the following factors to be considered in the determination of significance:

- The extent to which a project may increase or reduce GHG emissions compared to the existing environment;
- Whether the project exceeds an applicable significance threshold; and
- The extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs.

The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7[c]). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines Section 15064[h][3]).[20] A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.[21,22]

Neither the District nor the City has adopted a numerical significance threshold for assessing impacts related to GHG emissions; however, the SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds in 2008. For the purposes of this analysis, the SCAQMD's proposed threshold of

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[20] California Natural Resources Agency. 2009. *Final Statement of Reasons for Regulatory Action*, pp. 11-13, 14, 16. https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/Final_Statement_of_Reasons.pdf. Accessed August 17, 2022.

[21] State of California, Governor's Office of Planning and Research. 2009. *Transmittal of the Governor's Office of Planning and Research's Proposed SB97 CEQA Guidelines Amendments to the Natural Resources Agency.* https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/C01.pdf. Accessed August 17, 2022.

[22] 14 California Code of Regulations Section 15064(h)(3).

3,000 $MTCO_2$ per year was used to determine the Proposed Project's impacts related to GHG emissions in combination with GHG plan consistency analysis. The methodology for evaluating the Proposed Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation is the basis for determining the significance of the Proposed Project's GHG-related impacts on the environment.

Discussion of Impacts

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

***Less than Significant Impact*.** GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact**.**

Proposed Project-Related Sources of Greenhouse Gases

The Proposed Project would result in direct and indirect emissions of CO_2, CH_4, and N_2O, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from energy consumption, water demand, and solid waste generation. As the Proposed Project would propose upgrading by demolishing old buildings, constructing new buildings, and/or renovating existing structures without increasing overall student enrollment, there would be no increase in mobile sources emissions over existing conditions during operation. The California Emissions Estimator Model version 2020.4.0 (CalEEMod) was utilized to calculate the Proposed Project's construction and operational GHG emissions; refer to Appendix A, Air Quality, GHG Emissions, and Energy Data. **Table 4.8-1** presents the estimated CO_2, CH_4, and N_2O emissions associated with the Proposed Project; refer to Appendix A for the CalEEMod outputs.

TABLE 4.8-1 ESTIMATED GREENHOUSE GAS EMISSIONS

Source	CO_2	CH_4		N_2O		Total Metric Tons of CO_2e
	Metric Tons/yr[1]	Metric Tons/yr[1]	Metric Tons of CO_2e_2	Metric Tons/yr[1]	Metric Tons of CO_2e_2	
Direct Emissions						
Construction (total of 851.43 $MTCO_2e$ amortized over 30 years)	28.15	0.01	0.13	<0.01	0.10	28.38
Area Source	<0.01	0.00	0.00	0.00	0.00	<0.01
Mobile Source	0.00	0.00	0.00	0.00	0.00	0.00
Total Direct Emissions[3]	***28.16***	***0.01***	***0.13***	***0.00***	***0.10***	***28.38***
Indirect Emissions						
Energy	81.31	0.01	0.13	<0.01	0.32	81.75
Solid Waste Generation	3.42	0.20	5.10	0.00	0.00	8.48
Water Demand	10.78	0.04	1.00	<0.01	0.31	12.09
Total Indirect Emissions[3]	***95.51***	***0.25***	***6.23***	***<0.01***	***0.62***	***102.32***
Total Proposed Project-Related Emissions[3]	**130.69 MTCO2e/year**					
SCAQMD Threshold	**3,000 MTCO2e/year**					
Exceed Thresholds?	**No**					

Source: Refer to Appendix A, Air Quality, GHG Emissions, and Energy Data for detailed model input/output data.
Notes:
1. Emissions calculated using California Emissions Estimator Model Version 2020.4.0 (CalEEMod) computer model.
2. CO_2 equivalent values calculated using the EPA Website, Greenhouse Gas Equivalencies Calculator, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed August 8, 2022.
3. Totals may be slightly off due to rounding.

Direct Proposed Project-Related Sources of Greenhouse Gases

- *Construction Emissions*. Construction GHG emissions are typically summed and amortized over the lifetime of the Proposed Project (assumed to be 30 years), then added to the operational emissions.[23] As shown in **Table 4.8-1**, the Proposed Project would result in 28.38 $MTCO_2e$ per year (amortized over 30 years), which represents a total of 851.43 $MTCO_2e$ from construction activities.
- *Area Source*.[24] Area source emissions were calculated using CalEEMod and Project-specific land use data. As a conservative analysis, the existing emissions are not deducted from the Proposed Project's emissions. Additionally, the enrollment would be same as the existing condition. As noted in **Table 4.8-1**, the Proposed Project would result in less than 0.01 $MTCO_2e$ per year of area source GHG emissions.

[23] The Project lifetime is based on the standard 30-year assumption of the SCAQMD, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009.

[24] Area sources are defined by the SCAQMD as smaller sources of pollution (e.g., water heaters, gas furnaces, fireplaces, woodstoves, architectural coatings) that are typically associated with homes and non-industrial sources.

- *Mobile Source*.[25] As the Proposed Project would not change enrollment of the school, there would be no increase in mobile sources emissions over existing conditions during operation. As shown in **Table 4.8-1**, the Proposed Project would not directly result in mobile source-generated GHG emissions over the existing condition.

Indirect Project-Related Source of Greenhouse Gases

- *Energy Consumption.* Energy consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity would be provided to the campus by Southern California Edison (SCE). As shown in **Table 4.8-1**, the Proposed Project would indirectly result in 81.75 $MTCO_2e$ per year due to energy consumption.
- *Solid Waste*. Solid waste associated with operations of the Proposed Project would result in 8.48 $MTCO_2e$ per year; refer to **Table 4.8-1**.
- *Water Demand*. The Proposed Project's operations would result in a demand of approximately 5.07 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 12.09 $MTCO_2e$ per year; refer to **Table 4.8-1**.

Total Project-Related Sources of Greenhouse Gases

As shown in **Table 4.8-1**, the amount of Proposed Project-related GHG emissions from direct and indirect sources combined would total 130.69 $MTCO_2e$ per year. Therefore, the Proposed Project's GHG emissions would not exceed the SCAQMD threshold of 3,000 $MTCO_2$ per year, and impacts would be less than significant.

4.8-b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

The following discussion focuses on the Proposed Project's consistency with SCAG's 2020-2045 RTP/SCS and CARB's 2017 Scoping Plan. The District's Districtwide Plan for Sustainability (Sustainability Plan) also discusses the City's goals and policies in regard to GHG emissions. As the Sustainability Plan focuses on energy, a detailed analysis of the Proposed Project's consistency with the Sustainability Plan's goals and policies has been included in Section 4.6, Energy.

Proposed Project's Consistency with the SCAG 2020-2045 RTP/SCS

Table 4.8-2 demonstrates that the Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

[25] Mobile sources are defined by SCAQMD as moving sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats and airplanes.

TABLE 4.8-2 PROJECT CONSISTENCY WITH THE 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Proposed Project's Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies ▪ Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	**Consistent**. The Proposed Project would remove and demolish eight existing portable, two existing modular, and one existing permanent buildings, and construct three new buildings and renovate two existing buildings and outdoor areas on the school campus and satellite facility over five phases without changing the enrollment number. The Proposed Project would promote redevelopment of underperforming outmoded nonresidential uses. Additionally, the Proposed Project would promote healthy lifestyles by providing bicycle storage on-site. As such, the Proposed Project would be consistent with this reduction strategy.
Leverage Technology Innovations		
▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	HQTA, TPAs, NMA, Livable Corridors.	**Consistent.** The Proposed Project would be required to comply with all applicable Title 24 and CALGreen building codes at the time of construction. The new buildings would be solar compatible. Therefore, proposed development within the Proposed Project would leverage technology innovations and help the city, county, state, and SMMUSD meet their respective GHG reduction goals. The Proposed Project would be consistent with this reduction strategy.

Reduction Strategy	Applicable Land Use Tools	Proposed Project's Consistency Analysis
Support Implementation of Sustainability Policies		
▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions ▪ Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	PGA, Job Centers, HQTAs, TPA, NMAs, Livable Corridors, SOIs, Green Region, Urban Greening.	**Not Applicable.** This reduction strategy is directed at regional and local agencies, and not at individual development projects. However, the Proposed Project would support sustainability policies. The Proposed Project would implement sustainable design features in accordance with the current Title 24 and CALGreen standards. Additionally, the Proposed Project would exceed 2019 Title 24 standards by 10 percent. Sustainable design features include energy-efficient appliances, water and space heating/cooling equipment, building insulation and roofing, and lighting. Thus, the Proposed Project would be consistent with this reduction strategy.
Promote a Green Region		
▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	Green Region, Urban Greening, Greenbelts and Community Separators.	**Consistent.** The Proposed Project would be required to comply with all applicable Title 24 and CALGreen measures, which would help reduce energy consumption and reduce GHG emissions. The Proposed Project would be consistent with this reduction strategy. In addition, as noted in Section 4.6, Energy, the Proposed Project would not result in significant impacts related to the wasteful, inefficient, and unnecessary consumption of building energy during the Proposed Project's operation or preempt future energy development or future energy conservation.

Source: Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 3, 2020.

Proposed Project's Consistency with the 2017 Scoping Plan

The 2017 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. Some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions would be adopted as required to achieve statewide GHG emissions targets at an unknown time in the future. **Table 4.8-3** provides an evaluation of applicable reduction actions/strategies by emissions source category to determine whether the Proposed Project would be consistent with or exceed reduction actions/strategies outlined in the 2017 Scoping Plan.

TABLE 4.8-3 PROPOSED PROJECT'S CONSISTENCY WITH THE 2017 SCOPING PLAN

Actions and Strategies	Proposed Project's Consistency Analysis
Senate Bill 350	
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	**Consistent**. The Proposed Project would utilize electricity from SCE, which is required to comply with SB 350. As such, it can be reasonably inferred that the Proposed Project would be in compliance with SB 350.
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	**Consistent**. Motor vehicles driven by the future Proposed Project's employees would be required to use LCFS-compliant fuels in accordance with federal and state fuel standards that apply during Project operations; thus, the Proposed Project would be in compliance with this strategy.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	
Maintain existing GHG standards of light and heavy-duty vehicles while adding an addition 4.2 million zero-emission vehicles (ZEVs) on the road. Increase the number of ZEV buses, delivery trucks, or other trucks.	**No Conflict**. The Proposed Project would be required to comply with CALGreen. Furthermore, the state is expected to see a decrease in transportation sector GHG emissions due to Executive Order N-79-20. Executive Order N-79-20 directs the state to require all new vehicles sold in California to be zero-emission by 2035 (cars and passenger trucks) and by 2045 (medium- and heavy-duty vehicles). The Proposed Project would not increase student enrollment that would generate additional vehicle trips over existing conditions. For the reasons above, the Proposed Project would not conflict with the goals of the Mobile Source Strategy in this regard.
SB 375 Sustainable Communities Strategies	
Increase the stringency of the 2035 GHG emission per capita reduction target for metropolitan planning organizations (MPO).	**Consistent**. As shown in **Table 4.8-2**, the Proposed Project would be consistent with the 2020-2045 RTP/SCS.

Source: California Air Resources Board, 2017 Scoping Plan, November 2017.

Conclusion

In summary, the plan consistency analyses provided above demonstrate that the Proposed Project complies with, or exceeds, the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2020-2045 RTP/SCS and 2017 Scoping Plan. Thus, the Proposed Project's incremental increase in GHG emissions, as described above, would not result in a significant impact on the environment. The Proposed Project's impacts with regard to climate change would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
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?	☐	☐	☒	☐
e) For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☒	☐
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

This section is based, in part, on the Phase I Environmental Site Assessment prepared for the Proposed Project by Alta Environmental DBA NV5, dated April 2022, and included as Appendix D.

Overview

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined by the California Health and Safety Code, Section 25501 as follows:

> *A "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses 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 administering 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.

An extremely hazardous material is defined in Title 22, Section 66260.10, of the California Code of Regulations as follows:

"A substance or combination of substances which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the substance or combination of substances because of its quantity, concentration or chemical characteristics."

The release of hazardous materials into the environment could potentially contaminate soils, surface water, and groundwater supplies.

Most hazardous materials regulation and enforcement in Santa Monica is managed by the Santa Monica Fire Department, which refers large cases of hazardous materials contamination or violations to the Los Angeles Regional Water Quality Control Board (RWQCB) and the California Department of Toxic Substances Control (DTSC). It is not at all uncommon for other agencies to become involved when issues of hazardous materials arise, such as the SCAQMD and both the federal and state Occupational Safety and Health Administrations.

Under Government Code section 65962.5, both the DTSC and the State Water Resources Control Board (SWRCB) are required to maintain lists of sites known to have hazardous substances present in the environment. Both agencies maintain up-to-date lists on their websites.

A Phase I ESA was prepared by Alta Environmental DBA NV5 to evaluate the Proposed Project's site for potentially harmful hazardous materials; refer to Appendix D. A Tier 1 vapor encroachment screen was completed to evaluate for the potential for a vapor encroachment condition (VEC) which is the presence or likely presence of chemical of concern vapors in subsurface soils at the Proposed Project's site caused by the release of vapors from contaminated soil or groundwater on or near the site. The results of the VES did not identify evidence of a potential VEC in connection with the Site. In addition, the Phase I ESA concluded that there is no evidence of a recognized environmental condition (REC), controlled REC, or historic REC (HREC) in connection with the Proposed Project's site. However, based on the age of historical and current structures on the Site, arsenic, lead-based paint, asbestos, pesticides, and PCBs in caulking may have been historically used at the Site. As a result, there is a potential for these compounds to be present in the shallow soils onsite. Refer to the discussion below for further analysis.

Discussion of Impacts

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

Less than Significant Impact. Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Proposed Project's site. However, all potentially hazardous materials used during construction of the Proposed Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing

the risk of hazardous materials use. In addition, the Proposed Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts (OSHA), SCAQMD rules, and permits and associated conditions issued by the Santa Monica Building and Safety Division. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, the Proposed Project's construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Schools do not generate significant amounts of hazardous materials, and only a minimal amount of common day-to-day materials is stored on-site, such as those materials used in routine cleaning of buildings or maintenance of landscaping equipment. These materials would be used, stored, and disposed in accordance with existing regulations and product labeling and would not create a significant hazard to the public or to the environment. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Proposed Project would be less than significant.

4.9-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?

***Less than Significant Impact with Mitigation Incorporated*.** As discussed in Issue 4.9-a above, the Proposed Project would not result in the routine transport, use, or disposal, of any hazardous materials that would create a significant hazard to the public or the environment. In addition, as provided in the Phase I ESA, there is no evidence of underground or aboveground storage tanks within the campus, and no oil/gas wells are within the campus or adjoining properties. However, due to the age of the structures involved in construction activities, hazardous materials such as lead-based paint (LBP) and/or asbestos-containing materials (ACMs) could be released.

In the event that LBP is found within areas proposed for demolition or renovation, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to construction activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Proposed Project's site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards.

According to the DTSC Hazardous Waste Tracking System (HWTS) HAZNET database, the existing school disposed of 6.7 tons of asbestos containing waste in 1984 and 8.4 tons of asbestos containing waste in 1994. In the event that ACMs are found on-site during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations, including 40 CFR Part 763 Subpart E, Asbestos-Containing Materials in Schools Rule and SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities. In addition, development of the Proposed Project would include the use of commercially sold construction materials without ACMs. With compliance with relevant regulations and requirements, the Proposed Project's construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

As described above, the Phase I ESA also included vapor encroachment screening (VES) to evaluate the potential for vapor encroachment of chemicals of concern onto the campus, and to determine if such vapor encroachment constitutes evidence of a REC on the site. The VES Standard Guide requires the environmental professional to search for potential sites of concern within specific search radii—1,760 feet (1/3 mile) for non-petroleum contaminated sites and 528 feet (1/10 mile) for petroleum contaminated sites. The Phase I ESA identified several sites of potential concern within the VES search radii, based on review of governmental database records, regulatory agency files, and historical data sources (further detailed in issue 4.9-d below). However, based on review of available information, none of the sites appear to represent a VEC in connection with the campus.

Notwithstanding, the Phase I ESA states that based on the age of historical and current structures on the campus, there is the potential that there may be hazardous materials present, consisting of arsenic (from building materials), lead (from lead-based paint), asbestos (from building materials), pesticides (from prior termite treatment), and polychlorinated biphenyls (PCBs) (in window caulking). These compounds may be present in the shallow soils onsite, and based on their properties, do not have the tendency to migrate. As concluded in the Phase I ESA, it is recommended that a limited Phase II subsurface investigation be conducted in areas of proposed soil disturbance to evaluate shallow soil conditions with respect to the chemicals of concern listed above. Thus, the Proposed Project shall incorporate mitigation measure **HAZ-1** which would require preparation of the Phase II subsurface investigation, followed by remediation as applicable based on the results of the Phase II Investigation. As the hazardous materials may be present in shallow soils, the remediation activities are expected to consist of removing the affected soils and hauling to an appropriate landfill. With implementation of such mitigation, potential impacts related to the release of hazardous materials into the environment during the Proposed Project's construction activities would be less than significant.

Mitigation Measure:

HAZ-1 Prior to any soil disturbing construction activities on-site, a limited Phase II subsurface investigation shall be performed within areas of proposed soil disturbance to determine the presence of chemicals of concern in the campus. Based upon the findings of the investigation, the resultant recommendations shall be implemented to minimize/limit the release of these chemicals of concern.

Level of Significance: Less than significant with mitigation incorporated.

4.9-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 with Mitigation Incorporated*.** The Proposed Project's site is located on an existing elementary school campus. None of the proposed new uses would emit any hazardous emissions. A small amount of common household hazardous materials may be stored in a janitorial storeroom, including cleaning solutions, bleach and automotive lubricants. As detailed in issue 4.9-d below, according to the DTSC HAZNET database, the existing school disposed of the following: 6.7 tons of asbestos containing waste in 1984; 8.4 tons of asbestos containing waste in 1994; 0.15 ton of aqueous solution with total organic residues less than 10 percent in 2013; and 0.12 ton of PCB material in 2019. Nonetheless, the USEPA Facility Index System/Facility Registry System (FINDS) database and Resource Conservation and Recovery Act (RCRA) NonGen/NLR database indicates that the existing site is not listed as a handler of nonhazardous or hazardous waste. Operation of the Proposed Project would not result in significant emitted hazardous emissions or handling of hazardous materials, substances, or waste.

As previously discussed, however, based on the age of historical and current structures on the Site, arsenic, lead-based paint, asbestos, pesticides, and PCBs in caulking may have been historically used at the Site. As a result, there is a potential for these compounds to be present in the shallow soils onsite. Therefore, the Proposed Project shall implement mitigation measure **HAZ-1**, prior to soil disturbing construction activities and complete a limited Phase II subsurface investigation within areas of proposed soil disturbance. The Proposed Project would implement the resultant recommendations in order to reduce potential impacts related to the handling of hazardous soil materials during construction activities to a less than significant level.

4.9-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?

Less than Significant Impact. Section 65962.5 of the Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies.

As part of the Phase I ESA, agency database lists were reviewed for known or suspected contaminated sites and for sites that store, generate, or use hazardous materials near the subject property. Based on the database search, the Proposed Project's site was listed on the USEPA Enforcement and Compliance History Online (ECHO) database; however, no violations are reported. According to four listings on the DTSC HAZNET database, the existing school disposed of the following: 6.7 tons of asbestos containing waste in 1984; 8.4 tons of asbestos containing waste in 1994; 0.15 ton of aqueous solution with total organic residues less than 10 percent in 2013; and 0.12 ton of PCB material in 2019. The USEPA FINDS database and RCRA NonGen/NLR

database indicates that the campus is not listed as a handler of nonhazardous or hazardous waste. In addition, no records of the existing site were identified by the Regional Water Quality Control Board's Geotracker database, DTSC's Envirostor, and Santa Monica Fire Department records (SWRCB 2022).

Near the northeastern portion of the campus and across 25th Street is the site of 2502 Montana Avenue, which operated as an automobile service and gasoline station from 1928 to 1972, according to the Environmental Database Report (EDR) Historical Auto Stations (HIST AUTO) database. According to the Santa Monica Fire Department records, all underground storage tanks were removed from this property in 1974, and the site was redeveloped into a multi-family residential apartment building. As concluded in the Phase I ESA, based on the removal of the tanks, separation distance, and local depth to groundwater, this listing is not considered to represent an REC with respect to the campus.

Based on the above, the Proposed Project would not create significant hazard to the public or the environment, and such impacts would be less than significant.

4.9-e For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

***Less than Significant Impact*.** The campus is located approximately 2.2 miles northwest of the Santa Monica Municipal Airport located at 3223 Donald Douglas Loop South. The Santa Monica Municipal Airport is governed by Santa Monica Municipal Code Chapter 10.04 (Municipal Airport) also referred to as the Santa Monica Airport Code and the Los Angeles County Airport Land Use Plan developed by the Los Angeles County Department of Regional Planning/Los Angeles County Airport Land Use Commission (ALUC). This latter document is intended to provide for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations and to protect the municipal environment from the effects of aircraft noise. Potential land use development is to be judged compatible with the airport based on criteria set forth in the ALUC Procedural Policies contained in the ALUC document.

According to the Los Angeles County Airport Land Use Plan, the campus is not located within the Santa Monica Airport Influence Area (Los Angeles County ALUC 2004). Federal Aviation Regulations Part 77 establishes standards and notification requirements for objects affecting navigable airspace. CFR Title 14 Part 77.13 requires that any applicant who intends to perform any construction or alterations to structures that exceed 200 feet in height above ground level must notify the Federal Aviation Administration for the Proposed Project's approval. The Proposed Project does not include high-rise structures in the proximity of the airport airway that would conflict with FAR Part 77 regulations. As a result, the Project would not result in safety hazards for people residing or working in the area.

Additionally, as the campus is not located within the boundaries of the Airport Influence Area, nor any noise contours for the airport, occupants of the Proposed Project would not be exposed to excessive noise from airport operations. The Proposed Project's improvements to the existing on-site school facilities; no new land use is proposed, and no increase in occupancy or student

enrollment would result. Therefore, the Proposed Project would not result in the exposure of occupants of the site to increased safety hazards or noise relative to airport operations. A less than significant impact would occur.

4.9-f Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

No Impact. Phase 1 of the Proposed Project's construction includes the addition of a fire truck turn lane and installation of a fire water line to reach the central portion of the campus. The Proposed Project would necessitate an update to the school evacuation plan as a result of the modifications and construction on the campus. The Proposed Project would conform to applicable City of Santa Monica Fire Department codes and policies and would comply with California Senate Bill 187 requirements for Comprehensive School Safety Plans. All campus plans, including the location of all buildings, fences, driveway gates, retaining walls, and other construction affecting Fire Department access, with unobstructed fire lanes for access indicated would be subject to approval by the state Fire Marshal. The Proposed Project would not affect the conditions of the nearest disaster routes, which include San Vicente Boulevard (0.7 miles to the north), Santa Monica Boulevard (0.7 miles to the south), Santa Monica Freeway I-10 (1.3 miles to the south), and San Diego Freeway 405 (2.1 miles to the east) (County of Los Angeles Department of Public Works n.d.). Therefore, the Proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and no impacts would occur.

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

***No Impact*.** The campus is in a fully built-out urban environment. The campus is not identified by the California Department of Forestry and Fire Protection (CalFire) as a fire hazard severity zone or in a state responsibility area (CalFire). Therefore, there would be no impact regarding exposure of people to wildland fire hazards as a result of the Proposed Project's implementation.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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,	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				

Overview

The Proposed Project's school site is located in the Santa Monica Plain, an uplifted and inclined alluvial surface within the southwestern block of the Los Angeles Basin (Leighton 2022; Appendix C). The Proposed Project's site is mapped within the United States Geological Survey (USGS) 7.5-Minute Beverly Hills Quadrangle, which shows the Project school campus to be relative flat with an approximate elevation of ±255 to +265 feet above mean sea level (amsl) (Leighton 2022; Appendix C). The Federal Emergency Management Agency (FEMA) has prepared a Flood Insurance Rate Map (FIRM) depicting flood hazard areas in Los Angeles County. According to FEMA, no portion of the Proposed Project's site is located within a 100-year floodplain (Flood Map 06037C1590G) (FEMA 2020). The school campus is located in Zone X, an Area of Minimal Flood Hazard (FEMA 2020). The Proposed Project's area is within the jurisdictional boundaries of the Los Angeles RWQCB, one of nine regional boards in the state. The Los Angeles RWQCB protects ground and surface water quality in the Los Angeles region, including the coastal watersheds of

Los Angeles and Ventura Counties, along with very small portions of Kern and Santa Barbara Counties. Specifically, the RWQCB identifies potential water quality problems, confirms and characterizes water quality problems through assessments, remedies problems through imposing or enforcing appropriate measures, and monitors problem areas to assess effectiveness of remedial measures. Remedies for problems include prevention and cleanup. Common means of prevention are the issuance of National Pollutant Discharge Elimination System (NPDES) permits, waste discharge requirements, and discharge prohibitions and restrictions. Cleanup is implemented through enforcement measures such as Cease and Desist Orders and Cleanup and Abatement Orders.

The campus is located within the City of Santa Monica's water service area (City of Santa Monica 2021). The City supplies potable water through a combination of local groundwater from the Santa Monica Groundwater Basin and water purchased from the Metropolitan Water District of Southern California (MWD) that is imported from the Colorado River or State Water Project. A small amount of non-potable water (less than one percent of the total water supply) is available to the City from the City's Santa Monica Urban Runoff Recycling Facility, which provides non-potable water for uses such as irrigation, toilet flushing, and street sweeping.

The City's local groundwater supply provides on average approximately 60-70 percent of the total water supply (City of Santa Monica 2021). Groundwater supply has historically been impacted by third-party contamination as well as aging infrastructure in recent years, particularly groundwater production wells operating beyond the typical useful life. The basin encompasses an area of 50.2 square miles in western Los Angeles County and underlies the cities of Santa Monica, Culver City and Beverly Hills, and portions of western Los Angeles. The *Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin* (GSA 2022) adopts the historical range of estimates for the sustainable yield for the Subbasin of 10,800 acre-feet per year (AFY) and 19,700 AFY.

Discussion of Impacts

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

***Less than Significant Impact*.** The Proposed Project entails the demolition and construction of structures and outdoor spaces substantial portions of the school campus across the Proposed Project's phases. During construction, there is potential for the Proposed Project to result in degradation of water quality due to: use of routine hazardous materials such as vehicle and equipment fuels, lubricants, greases, and oils; erosion and sedimentation, and release of debris during earth-disturbance and demolition activities; and paints and coatings in building. As discussed in Section 4.9, Hazards and Hazardous Materials, construction of the Proposed Project would not create a significant hazard through the transport, use, or disposal of hazardous materials. The Proposed Project is subject to compliance with SMMC Chapter 7.10, Urban Runoff Pollution and Low Impact Development, which the Los Angeles RWQCB has deemed to provide equivalent if not greater water quality benefits than those derived from implementation of the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit (Order No. R4-2012-0175), for which the City is also a co-permittee. As such, construction-related activities would be

subject to mandates of the Los Angeles RWQCB that would prevent a violation of water quality standards, waste discharge requirements, and would prevent water quality degradation.

Prior to construction of each phase of the Proposed Project, the District would be required to prepare and implement site specific BMPs consistent with its Construction Stormwater Pollution Prevention Plan (SWPPP). Specifically, BMPs required through the Proposed Project's SWPPP and compliance with SMMC Chapter 7.10 include: use of wattles, covering of stockpiles, silt fences, and other physical means of stabilize disturbed materials and slowing stormwater flow from the graded areas to allow sediment to settle before entering stormwater channels; and scheduling intensive work activities, such as demolition and ground disturbance to occur outside of the rainy season. The method used would be described in the SWPPP and may vary depending on the circumstances of construction. While not anticipated, if dewatering during construction is needed, the Proposed Project would also be required to obtain a general permit for construction dewatering issued by the RWQCB. Construction of the Proposed Project would therefore not violate water quality standards or waste discharge requirements and would not otherwise substantially degrade water quality. In summary, construction of the Proposed Project, including the planned phased development, would result in a less than significant impact.

During operations, the Proposed Project may result in potential stormwater pollution with use of maintenance supplies such as household cleaners, oil and grease, and paints, and pesticides and fertilizers from landscaped areas. However, the District would be required to comply with SMMC Chapter 7.10, which prescribes good housekeeping requirements pertaining to irrigation water, storage of hazardous substances, prohibitions on pesticides, herbicides, fungicides, and other substances, and urban runoff reduction requirements, including implementing an Urban Runoff Mitigation Plan and Low-Impact Development (LID) design, which would reduce site runoff, erosion, and sedimentation.

Further, the Standard Urban Stormwater Mitigation Plan (SUSMP), NPDES General Construction Permit, and Los Angeles County MS4 permit require that a project not increase stormwater flows from a site during operations. The Proposed Project has been designed such that stormwater flows generated would be managed on-site to ensure that an increase in volumes or rates above existing conditions does not result with the Proposed Project's implementation. Such design methods would reduce the potential for the Proposed Project to contribute to the degradation of downstream waters over the life of the proposed campus improvements.

As a result, construction and/or operation of the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant.

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

Less than Significant Impact. The City of Santa Monica, and the campus, lie within the Santa Monica Groundwater Basin, which is a subbasin of the Los Angeles Plain Groundwater Basin (DWR Basin 4-011.01). The City currently relies on groundwater to supplement its water supply. From 2016 to 2020, approximately 65 percent of the water supply was from local water resources and

35% was imported. An estimated 64 percent of the City's water supply during this time period was from groundwater; 35 percent was provided by MWD; and one percent was from recycled water sources (City of Santa Monica 2021).

The campus is located within an established educational campus. While there may be new landscaped or turf areas on-site requiring additional watering following the Proposed Project's completion, the District implements a water conservation program that includes upholding an agreement with the City to reduce water consumption by 2 million gallons per year to support the City's 20 percent water reduction goal (SMMUSD 2019). The District currently implements water conservation efforts at Franklin Elementary School by utilizing water monitoring software and smart (weather-based) irrigation controllers to track real-time water consumption, performance, and water system operations. Additionally, it is anticipated that resurfacing of the existing natural turf playfield during Phase 1 may involve installation of artificial turf which would reduce the amount of water needed for field irrigation, as has been previously demonstrated at the District's Lincoln Middle School (SMMUSD 2019). Recycled water is not currently used at the Franklin Elementary School site for landscaping irrigation purposes, nor is the use of such resources proposed with the new campus improvements. With incorporation of the school's active water conservation practices and design, in accordance with the District's agreement with the City, the Proposed Project would not substantially increase groundwater demand or otherwise deplete area groundwater supplies.

Although potential use of artificial turf with the proposed playfield improvements would decrease direct infiltration of on-site stormwater into the underlying groundwater table, as compared to that which occurs under existing conditions, with implementation of BMPs that would improve infiltration, including using of bio filtration and bioswales, it is anticipated that the volume of stormwater infiltration would be maintained. As discussed above, the Proposed Project would be subject to conformance with local and state requirements pertaining to the regulation of on-site stormwater flows to ensure that the Proposed Project does not result in degradation in the quality of downstream waters or groundwater supplies, or otherwise affect overall groundwater management within the basin.

As stated, the Proposed Project would be subject to requirements of SMMC Chapter 7.10, Urban Runoff Pollution and Low Impact Development, which is aimed at permanently modifying structural causes of urban runoff pollution, including the reduction of both runoff volume and runoff contamination from existing residential and nonresidential properties and from future development. The ordinance aims to ensure that project sites maximize on-site percolation of runoff and that rainwater is directed or contained so as not to become polluted by passage through contaminating material.

In accordance with Section 7.10.050(b), the City requires that new development prepare an Urban Runoff Mitigation Plan that identifies measures to infiltrate or treat projected runoff by an amount equal to or greater than the volume of runoff produced from a storm event through incorporation of design elements that address established goals so as to achieve the required projected runoff infiltration or treatment. Such design elements may include: 1) maximizing permeable areas to allow more percolation of runoff into the ground through such means as biofilters, green strips, or swales and encouraging the use of permeable materials in lieu of or to

replace hardscapes to increase the amount of runoff seepage into the ground; 2) maximizing the amount of runoff directed to permeable areas and/or maximizing stormwater storage for reuse or infiltration by such means as orienting roof runoff towards permeable surfaces, drywells, French drains, or other structural BMPs so that runoff will penetrate the ground instead of flowing off-site; grading the site to divert flow to permeable areas; using cisterns, retention structures, or green rooftops to store precipitation or runoff for reuse; or, removing or designing curbs or berms so as to avoid isolation of permeable or landscaped areas; or, 3) removing pollutants through installation of treatment control BMPs.

Alternatively, a waiver from the requirement to provide a design that infiltrates or treats projected runoff for new development by an amount equal to or greater than the volume of runoff produced from a storm event (SMMC section 7.10.050(b)) may be issued by the City of Santa Monica Director of the Department of Environmental and Public Works Management if it can be demonstrated that implementing such requirements is impractical. Recognized circumstances may include where the following conditions occur: extreme limitations of space for treatment; unfavorable or unstable soil conditions at a site to attempt infiltration; or, risk of groundwater contamination because a known unconfined aquifer lies beneath the land surface or an existing or potential underground source of drinking water is less than ten feet from the soil surface. If a waiver is granted, the applicant is required to transfer the savings in cost, as determined by the Director, to a City stormwater mitigation fund to be used to promote regional or alternative solutions for urban runoff pollution in the storm watershed. The mitigation fund may be operated by a public agency or a non-profit entity (SMMC section 7.10.050(f)).

Existing soils on the Proposed Project's site consist of undocumented artificial fill (dark brown to reddish brown sandy lean clay to silty clay with varying amounts of salty gravel) and Quaternary old alluvial fan deposits (brown, dark grayish brown, and reddish brown silty clay and sandy clay locally channelized with sand and salty gravels; ranging from very stiff to hard and medium dense to very dense) (Leighton 2022). Due to their composition, the alluvial fan deposits are anticipated to have a low infiltration rate. As such, the District may thereby opt to request a waiver, allowing for calculation of the average runoff from the site and instead making payment of in-lieu-of fees to meet the City's stated groundwater protection requirements.

Whether through engineering design methods or payment of in-lieu-of fees, the Proposed Project would conform to the City's requirements to ensure that groundwater recharge is not adversely affected over the life of the Proposed Project. With the Proposed Project's conformance to such local regulations, the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the Proposed Project would impede sustainable groundwater management of the basin. Impacts would be reduced to less than significant, and no mitigation is required.

4.10-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 substantial erosion or siltation on- or off-site;

***Less than Significant Impact*.** Refer also to the discussion under 4.10-b, above, regarding the addition of impervious surfaces on-site and controls for stormwater runoff. Currently, the campus is fully developed and does not contain any natural surface water features. Implementation of the Proposed Project may alter the existing drainage patterns on the site during construction during earthwork activities, and during operations by adding hardscapes which currently do not exist. However, the District would be required to prepare and implement a SWPPP for construction related drainage, to comply with the RWQCB's General Construction Stormwater Permit and comply with SMMC Chapter 7.10, Urban Runoff Pollution and Low Impact Development. The SWPPP and SMMC Chapter 7.10 will identify best management practices to be implemented on the Proposed Project's site to minimize soil erosion and protect existing drainage systems.

The Proposed Project has been designed in accordance with the 2019 and/or 2022 California Building Code and 2022 California Green Building Standards Code, which have been (or will be) adopted by the City, and measures identified in SMMC Chapter 7.10, which includes implementation of LID methods and preparation of an Urban Runoff Mitigation Plan. It should be noted that, as the Proposed Project would be phased over a number of years, each phase would be designed in accordance with the current CBC in effect at the time when construction is proposed. The Proposed Project's design, which would incorporate these requirements as well as engineering erosion controls, would be reviewed and approved as part of the Proposed Project's construction and building permits. Compliance with existing state and local regulations developed to minimize erosion and siltation would reduce this impact during construction and operations to a less than significant level.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. The campus does not contain any surface water features; however, implementation of the Proposed Project would alter existing drainage patterns and increase impervious surfaces. However, as mentioned, the Proposed Project would also be designed in accordance with the applicable California Building Code and California Green Building Standards Code, which prohibit an increase or concentration of post-construction runoff; and SMMC Chapter 7.10, which include implementation of LID design and preparation of an Urban Runoff Mitigation Plan, to demonstrate that the projected runoff from the site is reduced by at least a volume equivalent to the impermeable surfaces times 0.75". The Proposed Project's design would be reviewed and approved as part of the required construction and building permits. Compliance with existing state and local regulations developed to minimize stormwater drainage characteristics and surface runoff would reduce this impact during construction and operations to a less than significant level.

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,

***Less than Significant Impact*.** See also discussion under 4.10-a and elsewhere under 4.10-c in this subsection. Under existing conditions, the school campus is developed with hardscape surfaces

that influence infiltration and affect stormwater runoff from the site. Stormwater from the site currently is accommodated by connection to the City's public stormwater drainage system. Implementation of the Proposed Project would alter existing drainage patterns on-site and increase impervious surfaces that could have the potential to concentrate and increase runoff and exceed the existing stormwater drainage system capacity.

As discussed above, the Proposed Project would be designed in accordance with the 2022 California Building Code, 2022 California Green Building Standards Code, and SMMC Chapter 7.10, and would require LID design measures and preparation of an Urban Runoff Mitigation Plan. The Proposed Project would incorporate engineering design methods and BMPs consistent with state and local standards and regulations to ensure that runoff from the campus would not substantially increase in rate or volume, as compared to that which occurs under existing conditions. As such, it is not anticipated that development of the campus as planned would contribute increased amounts of runoff to the City's existing stormwater drainage system in a manner that would exceed capacity over short- or long-term operations. It is anticipated that the City's existing stormwater system would be adequate to accommodate stormwater runoff from the subject site, and expansion of existing City drainage facilities to serve the Proposed Project is not necessary or proposed.

Redevelopment of the campus could generate polluted runoff that includes sediment from soil disturbances; oil and grease from construction equipment, roadways, and parking lots; pesticides and fertilizers from landscaped areas; metals, paints, and hazardous materials from building demolition; and/or construction debris and trash. As discussed above, potential pollutants and runoff from the Proposed Project's construction and operation activities would be managed with implementation of the Proposed Project's SWPPP, Urban Runoff Mitigation Plan, and required practices identified in SMMC Chapter 7.10. As a result, compliance with existing regulations developed to reduce surface and polluted runoff would reduce this impact during construction and operations to a less than significant level.

iv) impede or redirect flood flows?

***Less than Significant Impact*.** As discussed above, the Proposed Project's drainage would be designed in accordance with the 2022 California Building Code, 2022 California Green Building Standards Code, and SMMC Chapter 7.10. The Proposed Project would be designed to maintain the existing surface flow characteristics and reduce runoff in accordance with LID design requirements and measures identified in the Urban Runoff Mitigation Plan prepared for the Proposed Project. As a result, compliance with existing state and local regulations would reduce this impact during construction and operations to a less than significant level.

4.10-d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

No Impact. The campus is located approximately two miles from the Pacific Ocean. Additionally, according to tsunami Inundation maps for the Santa Monica area produced by the California Department of Conservation, the Proposed Project's site is not located within a Tsunami Hazard Area or in an area affected by a seiche (CDOC 2022b). Additionally, the topography of the

Proposed Project's site is essentially flat and is not at risk of mudflows. Implementation of the Proposed Project would not result in any impacts related to seiche, tsunami, or mudflow.

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

Less than Significant Impact. Refer also to discussion under 4.10-a and 4.10-b, above. The Proposed Project would be designed to be consistent with the Statewide NPDES General Construction Permit and the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit (Order No. R4-2012-0175) for water quality control, for both construction and site improvements.

As mentioned above, the City's water supply is comprised of approximately 60-70 percent groundwater, which is produced from the Santa Monica Groundwater Basin, which is a subbasin of the Los Angeles Plain Groundwater Basin (DWR Basin 4-011.01). The Santa Monica Groundwater Basin is not adjudicated and is managed by the Santa Monica Basin Groundwater Sustainability Agency (GSA), which comprises the City of Santa Monica, City of Los Angeles Department of Water and Power (LADWP), City of Culver City, City of Beverly Hills, and the County of Los Angeles. The Santa Monica Groundwater Basin is considered a medium-priority groundwater basin; therefore, required preparation of the *Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin* (GSA 2022). The purpose of the Groundwater Sustainability Plan is to define the groundwater conditions that will be used to ensure the long-term sustainability of groundwater resources for current and future uses. Historically, the primary inflows have been mountain front recharge from the Santa Monica Mountains and precipitation. Historical estimates for the sustainable yield, which refers to the maximum quantity of groundwater, calculated over a base period representative of long-term conditions in the Subbasin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result of the Subbasin range from 10,800 AFY to 19,700 AFY. Currently no undesirable results related to groundwater extraction have been observed in the Silverado aquifer, which is the primary source of groundwater in the Subbasin.

As mentioned above, the campus is an established school campus and the Proposed Project does not involve an increase of student population. While there may be an increase in landscaped or turf areas requiring additional watering, the District has implemented a water conservation program and has an agreement with the City to reduce water consumption by 2 million gallons per year to support the City's 20 percent water reduction goal (SMMUSD 2019). The water conservation efforts at Franklin Elementary School, including conducting water audits to identify inefficient or wasteful water consumption and using water monitoring software and smart water meters contribute to the District's agreement with the City to conserve water. The Proposed Project would not affect any regional groundwater management measures in the Groundwater Sustainability Plan, and would have a less than significant impact on the Santa Monica Groundwater Basin groundwater management and replenishment activities.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Overview

The SMMUSD proposes to reconfigure and improve the existing Franklin Elementary School campus. As discussed in Section 3.0, Project Description, of this IS/MND, the Proposed Project would demolish and remove eight existing portable buildings, two existing modular buildings, and one existing permanent building; construct three new buildings; and renovate two buildings and outdoor areas on the existing school campus and adjacent satellite facility. The Proposed Project's site is zoned and designated by the City of Santa Monica as Institutional/Public Lands (PL) for the western portion of the Proposed Project's site and Multi-Unit Low-Density Residential (R2) for the northeastern parcel of the Proposed Project's site along Montana Avenue. No changes are proposed in current land use designations or zoning.

Discussion of Impacts

4.11-a Physically divide an established community?

***No Impact*.** While there are developed residential uses within the vicinity, the campus is located within an established school campus, the original construction of which dates back to 1924 and includes reconstruction in 1937 and expansion to the northeastern parcel along Montana Avenue in 1948. The Proposed Project's activities would occur entirely within the campus. Therefore, no impacts related to the physical division of an established community would result from the Proposed Project.

4.11-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?

***Less than Significant Impact*.** The Franklin Elementary School campus has a City of Santa Monica General Plan and zoning designation of Institutional/Public Lands (PL) for the western portion of the Proposed Project's site and Multi-Unit Low-Density Residential (R2) for the northeastern parcel of the campus along Montana Avenue. The PL zoning district permits public or semi-public facilities, including municipal offices, schools, libraries, museums, performance spaces, cemeteries, corporation yards, utility stations, and similar uses. The R2 zoning district permits two or more dwelling units within a single building or within 2 or more buildings on a site or parcel.

All activities associated with the Proposed Project would occur on the Franklin Elementary School campus. Implementation of the Proposed Project would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change. No changes to the existing land use designation or zoning are required or proposed with the Proposed Project. Additionally, the Proposed Project would result in a continuation of the existing use of the site (academic uses), and would not conflict with the intended use of the campus or with surrounding land uses. For the reasons above, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an adopted for the purpose of avoiding or mitigating an environmental effect.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
MINERAL RESOURCES. Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Overview

There are no active mines within or near the Proposed Project's site. No known areas with mineral resources on the Proposed Project's site.

Discussion of Impacts

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

***No Impact*.** According to the Department of Conservation's (DOC) California Geologic Emergency Management Division (CalGEM), no mineral resource recovery sites are located on or in the immediate vicinity of the Proposed Project's site (CDOC 2022c). The nearest oil and gas well to the Proposed Project's site is located approximately 0.55 miles to the east, with an additional oil and gas well approximately 0.94 miles to the northeast; however, these wells have been categorized as idle (CDOC 2022c). No other types of mineral resources are identified on or near the campus in the City's General Plan. As a result, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and no impacts would occur.

4.12-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 in Response 4.12-a. above, no mineral resource recovery sites are located on or in the immediate vicinity of the campus. Therefore, the Proposed Project would not 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 would occur.

4.13 NOISE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Overview

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the day-night sound level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10 dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime

hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. Similarly, community noise equivalent level (CNEL) is a measure of 24-hour noise levels that incorporates a 5 dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10 dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Two methods that reduce levels of environmental sounds are increasing the distance and/or having intervening obstacles, such as walls, buildings, or terrain features, between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing caused by various meteorological conditions.

Regulatory Setting

State of California

The Governor's Office of Planning and Research (OPR) *Noise Element Guidelines* include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The *Noise Element Guidelines* contain a land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of CNEL. A noise environment of 50 CNEL to 60 CNEL is considered to be "normally acceptable" for residential uses. OPR recommendations also note that, under certain conditions, more restrictive standards than the maximum levels cited may be appropriate.

Local

City of Santa Monica

City of Santa Monica General Plan

The General Plan Noise Element also addresses the issue of noise by identifying sources of noise in the City and providing objectives and policies that ensure that noise from various sources would not create an unacceptable noise environment. The Noise Ordinance places limitations on noise produced by equipment operation, human activities, and construction. The Noise Element policies and actions relevant to the Proposed Project are identified below.

- **Policy 4**: The City shall develop measures to control construction noise impacts.
  - Action 4.1(1): Clearly state the permitted hours of construction and expressly prohibit construction on Sunday.

City of Santa Monica Municipal Code (SMMC)

SMMC Chapter 4.12 (Noise) includes limitations on unnecessary, excessive, and annoying noises in the City. The following sections from the SMMC are applicable to the Proposed Project:

Section 4.12.030 – Exemptions

Section 4.12.30 of the SMMC lists the following activities that are exempt from noise regulations.

- Activities conducted on public or private school grounds including, but not limited to, school athletic and school entertainment events.
- Community events.
- Activities conducted on public property that is generally open to the public, including, but not limited to, streets, sidewalks, alleys, parkways, parks, and beaches.

Section 4.12.050 – Designated Noise Zones

Noise Zone I. All property in a residential district established by Santa Monica Municipal Code Section 9.02.010(B)(1) or any revisions thereto; except, however, the Santa Monica Pier shall be excluded from this noise zone.

Noise Zone II. All property in a nonresidential district established by Santa Monica Municipal Code Section 9.02.010(B)(2) or any revisions thereto; except, however, the industrial conservation district shall be excluded from this noise zone and the Santa Monica Pier shall be included in this noise zone.

Noise Zone III. All property in the industrial conservation district as established by Santa Monica Municipal Code Section 9.02.010(A).

Section 4.12.060 – Exterior Noise Standards

Section 4.12.060 outlines the noise standards for Noise Zones I, II, and III (refer to **Table 4.13-1**). The Noise Ordinance also states that if the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard.

TABLE 4.13-1 EXTERIOR NOISE STANDARDS IN THE CITY OF SANTA MONICA

Noise Zone	Time Interval	Allowable L_{eq}	
		15-Minute Continuous Measurement Period	5-Minute Continuous Measurement Period
I	**Monday through Friday**		
	10 p.m. to 7 a.m.	50 dBA	55 dBA
	7 a.m. to 10 p.m.	60 dBA	65 dBA
	Saturday and Sunday		
	10 p.m. to 8 a.m.	50 dBA	55 dBA
	8 a.m. to 10 p.m.	60 dBA	65 dBA
II	**All days of week**		
	10 p.m. to 7 a.m.	60 dBA	65 dBA
	7 a.m. to 10 p.m.	65 dBA	70 dBA
III	Anytime	70 dBA	75 dBA

Source: Santa Monica Municipal Code Section 4.12.060.

Section 4.12.070 – Vibration

Section 4.12.070 prohibits any person to create, maintain, or cause any ground vibration that is perceptible without instruments at any point on any property. The perception threshold shall be presumed to be more than 0.05 inches per second root-mean-square velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft is exempt from this section.

Section 4.12.110 – Restrictions on Demolition, Excavation, Grading, Spray Painting, Construction, Maintenance, or Repair of Buildings

Section 4.12.110 restricts the hours for construction activity to between 8:00 a.m. and 6:00 p.m. on Mondays through Fridays and from 9:00 a.m. to 5:00 p.m. on Saturdays, with some exceptions for construction that the City deems to be in the public interest. Construction activity is prohibited on Sundays and holidays. This section also sets limits for noise from construction activities relative to the noise standards set in Section 4.12.060, with the equivalent noise level not to exceed 20 dBA above standards and the maximum instantaneous noise level not to exceed 40 dBA above standards. Any construction exceeding this limit is required to occur between 10:00 a.m. and 3:00 p.m. Monday through Friday.

A permit may be issued authorizing construction activity during the times prohibited by this section whenever it is found to be in the public interest. Prior to commencing work pursuant to the permit, notification will be provided to persons occupying property within a perimeter of 500 feet of the site of the proposed construction activity. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit.

Existing Conditions

Existing Noise Sources

The Proposed Project area is subject to typical urban noises, such as noise generated by traffic, school, and day-to-day outdoor activities. Noise around the campus is the cumulative effect of noise from transportation activities and stationary sources. Transportation noise typically refers to noise from automobile use, trucking, airport operations, and rail operations. Stationary noise typically refers to noise from sources such as heating, ventilation, and air conditioning (HVAC) systems, compressors, landscape maintenance equipment, or machinery associated with local industrial or commercial activities. The site is primarily subject to traffic noise on the adjacent roadways.

Noise Measurements

In order to quantify existing ambient noise levels in the Proposed Project's area, Michael Baker conducted five (total) short-term noise measurements on January 21, 2022; refer to **Table 4.13-2**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Proposed Project's site. The 10-minute measurements were taken between 8:00 a.m. and 10:00 a.m. To establish noise levels during both the peak student drop-off time and ambient conditions, two noise measurements were conducted at both Site 1 and Site 3; only one noise measurement was conducted at Site 2. Refer to Appendix E, Noise Data, and **Figure 4.13-1, Noise Measurement Locations**.

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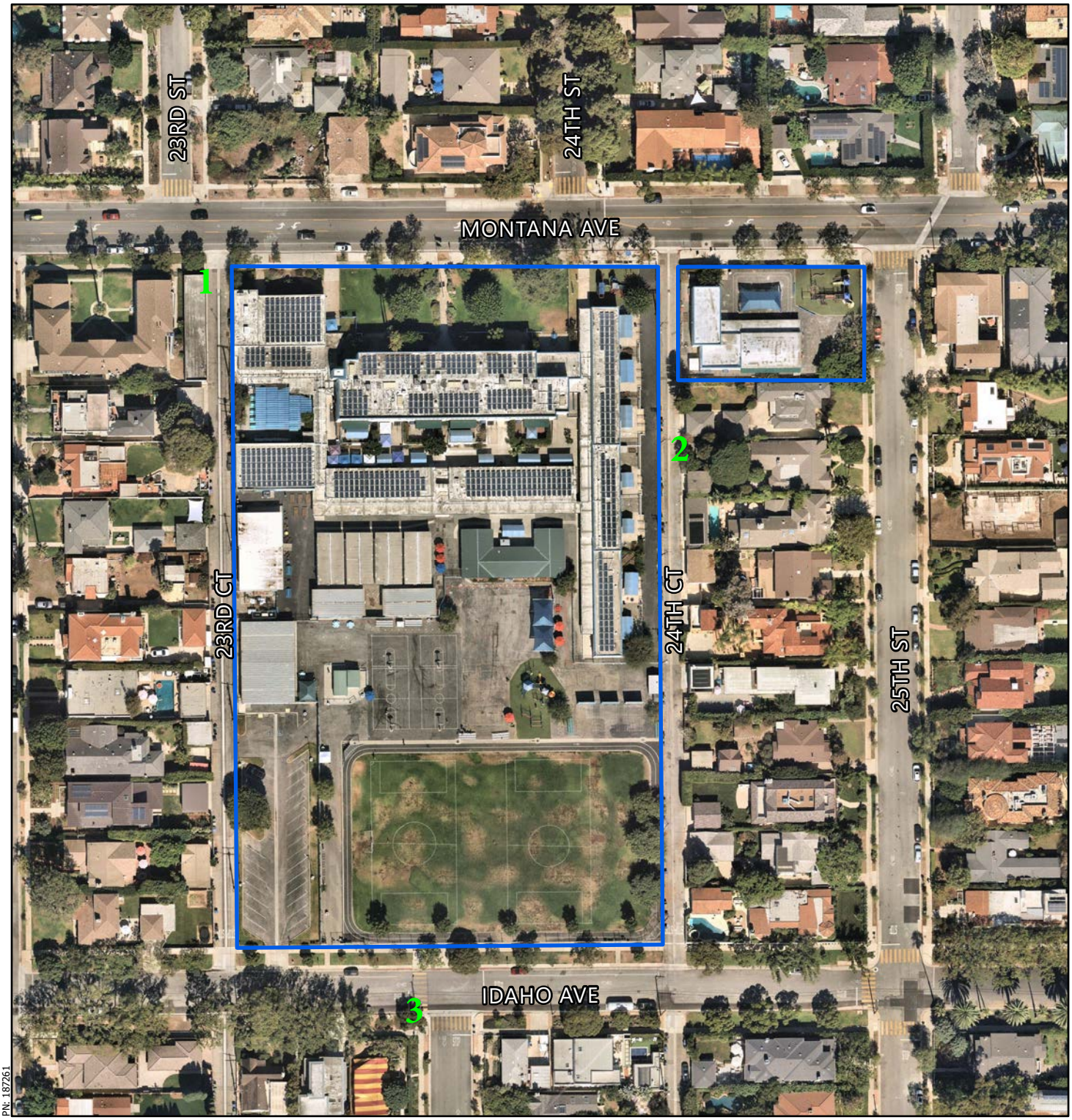

PN: 187261

Project Area

1 Noise Measurement Locations

Michael Baker INTERNATIONAL

0 50 100 200 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Noise Measurement Locations

Figure 4.13-1

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TABLE 4.13-2 NOISE MEASUREMENTS

Site No.	Location	Condition	Leq (dBA)	Lmin (dBA)	Lmax (dBA)	Time
1	The alley entrance between Franklin Elementary School and 2316 23rd Street	Drop-Off	66.1	46.7	86.1	8:21 a.m.
		Ambient	65.6	40.9	76.5	9:00 a.m.
2	The alley between Franklin Elementary School between the backyard of 818 25th Street	Ambient	53.5	43.8	68.4	9:21 a.m.
3	South corner of intersection of Idaho Avenue and 24th Street	Drop-Off	57.3	47.8	71.3	8:06 a.m.
		Ambient	53.5	40.5	67.2	9:38 a.m.

Source: Refer to Appendix E, Noise Data.

Meteorological conditions when the measurements were taken were clear skies, cool temperatures, with moderately light wind speeds (less than five miles per hour), and low humidity. Measured noise levels during the daytime measurements ranged from 53.5 to 66.1 dBA L_{eq}. The sources of peak noise are aircraft and traffic along Montana Avenue. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I (precision) sound level meters. The results of the field measurements are included in Appendix E.

Sensitive Receptors

Sensitive populations are more susceptible to the effects of noise than the general population. Land uses considered sensitive by the State of California include schools, playgrounds, athletic facilities, hospitals, rest homes, rehabilitation centers, long-term care, and mental care facilities. Generally, a sensitive receptor is identified as a location where human populations (especially children, senior citizens, and sick persons) are present. Land uses less sensitive to noise are business, commercial, and professional developments. Noise receptors categorized as being least sensitive to noise include industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, and transit terminals. These types of land uses often generate high noise levels. Moderately sensitive land uses typically include multifamily dwellings, hotels, motels, dormitories, and outpatient clinics. The nearest off-site noise-sensitive land uses in the Proposed Project's vicinity are single-family residences located immediately adjacent to the satellite school facility on the northeast corner of the Proposed Project's site. However, the distance from demolition, grading, and construction activities would change with each phase of construction. Refer to **Table 4.13-3**, **Off-Site Sensitive Receptors**.

TABLE 4.13-3 OFF-SITE SENSITIVE RECEPTORS

Site Number	Description	Location	Distance from Project Site (feet)
1	Single-Family Residential	North	75
2	Single-Family Residential	South	80
3	Single-Family Residential	East	20
4	Single-Family Residential	West	20
5	Multi-family Residential	Northwest	20
5	Single-Family Residential	South of Satellite Facility	Immediately Adjacent to the Satellite Facility

Source: Google Earth Pro. Accessed August 1, 2022.

On-site noise-sensitive receptors would include students in classrooms. During each construction phase, displaced school faculty and students would be relocated to different locations on campus.

Discussion of Impacts

4.13-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?

Less than Significant Impact with Mitigation Incorporated.

Short-Term Noise Impacts

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction activities would include demolition, grading, building construction, paving, and architectural coating. Ground-borne noise and other types of construction-related noise impacts typically occur during the initial demolition and earthwork phase. This phase of construction has the potential to create the highest levels of noise.

The construction period for the Proposed Project would occur in five phases and is anticipated to start in 2023 and end in 2032. For the purposes of the analysis of noise impacts, the Proposed Project's construction activities were modeled to occur for just over 10 years, whereas the actual implementation time frame may take longer. The estimated construction schedule for each phase is shown in **Table 3-2**, **Construction Schedule**. Because the school campus has been fully developed, construction of each phase would generally involve demolition of some existing structures, followed by minor grading and foundation work, building construction, and architectural coating. Phases 1 and 4 include creating outdoor spaces, which would include either converting some grassy areas into hardscape or replacing hard surfaces with grass and landscaping. Phase 5 involves demolition of the existing cafeteria and construction of a new cafeteria and culinary education building, and outdoor dining area. Phase 3 involves remodeling of existing structures, and no major construction is proposed.

The potential for construction-related noise to affect nearby sensitive receptors would depend on multiple variables, including the specific equipment types, size and number of equipment used, amount of time each piece is in operation, the load factor that the equipment is being used, and the location and proximity of construction activities to these receptors.

Off-Site Receptors

The closest sensitive receptors to the Proposed Project's site are the single-family residential uses immediately south of the existing satellite facility on the northeast corner of the Proposed Project's site. However, the Proposed Project does not propose any major construction activity there. The majority of the demolition and construction activities are expected to occur along the eastern and western areas of the Proposed Project's site. As a result, construction noise is assessed at a distance of 20 feet from the nearest noise sensitive receptors to the east and west. SMMC Section 4.12.110 sets limits for noise from construction activities relative to the noise standards set in SMMC Section 4.12.060, with the equivalent noise level not to exceed 20 dBA above standards and the maximum instantaneous noise level (L_{max}) not to exceed 40 dBA above standards. Land uses surrounding the campus are located in Noise Zone I. Typical noise levels generated by the Proposed Project's construction equipment are shown in **Table 4.13-4**. It should be noted that the noise levels identified in **Table 4.13-4** are maximum sound levels (L_{max}), which are the highest individual sounds occurring at an individual time period. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

TABLE 4.13-4 MAXIMUM NOISE LEVELS GENERATED BY CONSTRUCTION EQUIPMENT

Type of Equipment	Acoustical Use Factor[1]	L_{max} at 50 Feet (dBA)	L_{max} at 20 Feet (dBA)
Crane	16	81	89
Backhoe	40	78	86
Dozer	40	82	90
Excavator	40	81	89
Forklift	40	78	86
Roller	20	80	88
Tractor	40	84	92
Water Truck	40	80	88
Grader	40	85	93
General Industrial Equipment	50	85	93

Source: Federal Highway Administration, Roadway Construction Noise Model (FHWA-HEP-05-054), January 2006.
Note:
1. Acoustical Use Factor (percent): Estimates the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation.

Construction Equipment Noise Impacts

As shown in **Table 4.13-4**, construction equipment used during each phase of construction of the Proposed Project would generate noise levels of up to 93 dBA L_{max} at 20 feet. However, overall noise emissions vary considerably, depending on the specific activity being performed at any given moment. Noise attenuation due to distance, the number and types of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively

ignoring other attenuation effects from air absorption, ground effects, and shielding effects), and the average noise levels at noise-sensitive receptors could vary considerably because mobile construction equipment would move around the site with different loads and power requirements. As previously mentioned, the City of Santa Monica Noise Code (Chapter 4.12) allows construction activity between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturday; however, as appropriate, the District may request a waiver from the City to allow for construction to occur outside of the standard hours of construction (e.g., prior to 8:00 a.m.). No construction work is allowed on Sunday or on holidays, and no nighttime construction work is anticipated to occur. To expedite the construction phases, the District is seeking a noise permit from the City to authorize construction activity to begin at 7:00 a.m. on weekdays. This is needed to allow construction workers to arrive on campus and begin working prior to the arrival of students.

These permitted hours of construction are required in recognition that construction activities undertaken during permitted hours are a typical part of living in an urban environment and do not cause a significant disruption. The Proposed Project's construction activities would be conducted during allowable hours per the SMMC.

As shown in **Table 4.13-4**, construction equipment noise levels during the construction activity are not expected to exceed the SMMC construction noise standard of 40 dBA over the exterior noise thresholds of single-family and multifamily residences, which is 100 dBA during daytime for Noise Zone I, when within 20 feet of a nearby receptor property line. As discussed above, this is a conservative analysis because construction equipment would likely not remain at the boundary of the phase area for an entire eight-hour workday.

While the Proposed Project's construction noise emissions would not exceed noise thresholds, the Proposed Project would implement mitigation measure **NOI-1** to further lessen the construction noise to the extent feasible. Mitigation measure **NOI-1** would require the District, through its construction contractor, to prepare a construction noise mitigation plan that incorporates best management practices during construction to ensure nuisances do not occur. Implementation of mitigation measure **NOI-1** would further minimize impacts from construction noise as it requires construction equipment to be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices, such as noise shielding devices. Thus, with implementation of mitigation measure **NOI-1**, impacts would be reduced to less than significant levels.

Construction Truck Noise Impacts

In addition to construction noise on-site, construction activities would also cause increased noise along access routes to and from the site due to movement of equipment and workers, as well as haul trips. There would be a relatively high single-event noise exposure potential at a maximum level of 87 dBA L_{max} with trucks passing at 50 feet from receptors along roadway segments leading to the Proposed Project's site. The Proposed Project is estimated to import approximately of 6,500 cubic yards of soil would during Phase 2 of construction. Based on the Proposed Project's construction estimates, it is anticipated that construction would generate a maximum of 18

hauling trips per day, 18 worker trips per day, and 1 vendor trip per day; refer to Appendix E. As a result, mobile source noise would increase along access routes to and from the Proposed Project's site during construction, mainly along Idaho Avenue. Per Caltrans Technical Noise Supplement, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear.[26] A total of 37 construction-related truck trips per day is not anticipated to double existing traffic volumes along Montana Avenue and Idaho Avenue, and any increase in traffic noise levels would be imperceptible. Further, SMMC Section 4.12.110 restricts the hours for construction activity to between 8:00 a.m. and 6:00 p.m. on Mondays through Fridays and 9:00 a.m. to 5:00 p.m. on Saturdays. However, a permit maybe issued authorizing certain construction activity outside of the restricted hours if such allowances are found to be in the public interest. The District intends on obtaining this permit to conduct allowable construction activities after normal hours but not during typical sleeping hours. Therefore, upon compliance with the City's allowable construction hours, or in accordance with City approval for allowable exceptions for construction activities per SMMC Section 4.12.110(e), noise impacts from the Proposed Project's construction would be less than significant.

Long-Term Noise Impacts

The Proposed Project would not result in an increase in noise over existing conditions. The new construction and reconfiguration of the Franklin Elementary School Campus would not increase the number of HVAC units on the buildings or decrease the distances to the nearest sensitive receptors. Also, the Proposed Project does not involve an increase in student enrollment. As a result, the traffic generated by students, athletic, theatrical, and community events that take place after school is not expected to increase. Per SMMC Section 4.12.30, activities conducted on public parks, public playgrounds, and public or private school are exempt from noise laws and ordinances. Therefore, operational noise impacts as a result of the Proposed Project would be less than significant without mitigation.

Mitigation Measure:

NOI-1 The District, through its construction contractor, shall prepare a construction mitigation plan and demonstrate, to the satisfaction of the City of Santa Monica Public Works Department, that the Project complies with the following:

- The construction contractor shall ensure that power construction equipment (including combustion or electric engines), fixed or mobile, shall be equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of Project construction. The combination of muffling devices and noise shielding shall be capable of reducing noise by at least 5 dBA from non-muffled and shielded noise levels. Prior to initiation of construction, the contractor shall demonstrate to the City that equipment is properly muffled, shielded, and

[26] California Department of Transportation. 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf. Accessed August 11, 2022.

maintained. All equipment shall be properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.

- The construction mitigation plan shall depict the location of construction equipment storage and maintenance areas, and document methods to be employed to minimize noise impacts on adjacent noise sensitive land uses.

- Property owners and occupants located within 500 feet of the Project grading limits shall be sent a notice, at least 15 days prior to commencement of construction, regarding the Project construction schedule. A sign, visible to the public, shall also be posted at the Project construction site. All notices and signs shall be reviewed and approved by the City of Santa Monica Public Works Department prior to mailing or posting and shall indicate the dates and duration of construction activities, as well as providing a contact name and a telephone number where residents can inquire about the construction process and register complaints.

- The construction contractor shall provide evidence that a construction staff member is designated as a Noise Disturbance Coordinator and shall be present on-site during construction activities. The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City of Santa Monica Public Works Department. All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator.

- The District, through its construction contractor, shall demonstrate to the satisfaction of the City of Santa Monica Public Works Department that construction noise reduction methods shall be used, including but not limited to shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and the use of electric air compressors and similar power tools, to the extent feasible.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- To the extent feasible, haul routes shall be designed such that the routes do not pass sensitive land uses or residential dwellings.

In compliance with Santa Monica Municipal Code Section 4.12.110, construction activities and haul truck deliveries shall only occur between the hours of 8:00 a.m. to 6:00 p.m. on Mondays through Fridays and 9:00 a.m. to 5:00 p.m. on Saturdays. However, as noted above, it is anticipated that the District will request City approval of a permit to allow for some construction activities to occur outside of allowable hours.

4.13-b Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact.

Construction Vibration Impacts

The Proposed Project's construction can generate varying degrees of ground-borne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels.

Types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. The Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* identifies various vibration damage criteria for different building classes. This evaluation uses the FTA architectural damage thresholds for continuous vibrations of 0.2 inch/second peak particle velocity (PPV) for engineered concrete and masonry buildings and 0.12 inch/second PPV for buildings extremely susceptible to vibration damage, such as certain historic structures. As the nearest structures to the Proposed Project's construction areas are residential structures, this threshold is considered appropriate. Typical vibration levels produced by construction equipment expected to be used in the Proposed Project are listed in **Table 4.13-5**, **Typical Vibration Levels for Construction Equipment**.

TABLE 4.13-5 TYPICAL VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Reference peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 20 feet (inch/sec)	Approximate peak particle velocity at 100 feet (inch/sec)
Loaded trucks	0.076	0.106	0.009
Tractors	0.003	0.004	<0.001
Small bulldozer	0.003	0.004	<0.001

Notes:
1. Calculated using the following formula:
PPV equip = PPV ref x (25/D)1.5
where: PPV equip = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV ref = the reference vibration level in in/sec from Table 7-4 of the FTA Transit Noise and Vibration Impact Assessment Guidelines
D = the distance from the equipment to the receiver
Source: Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual, Table 7-4 Vibration Source Levels for Construction Equipment.

Groundborne vibration decreases rapidly with distance. The Proposed Project predominantly consists of renovation of the existing structures and is not expecting any major construction involving heavy construction equipment, such as vibratory rollers or large bulldozers. The nearest

sensitive receptors to where major construction activities would occur are the existing single-family residences located approximately 20 feet to the east and west of the nearest construction activities, across the alley way. The vibration levels are then compared to the FTA 2018 manual, "Construction Vibration Damage Criteria." [27] As indicated in **Table 4.13-5**, vibration velocities from typical heavy construction equipment operations that would be used during construction range from 0.004 to 0.106 inch/second PPV at 20 feet from the source of activity and would not exceed the 0.2 inch/second PPV and 0.12 inch/second thresholds. Additionally, there is a historic building on-site, which is approximately 100 feet from the nearest major construction activities. Based on **Table 4.13-5,** vibration velocities from typical heavy construction equipment operations that would be used during the Proposed Project's construction range from less than 0.001 to 0.009 inch/second PPV at 100 feet from the source of activity and would not exceed the 0.12 inch/second PPV FTA threshold for certain historic buildings. Therefore, groundborne vibration impacts during the Proposed Project's construction would be less than significant.

Operational Vibration Impacts

The Proposed Project's operation would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. According to the FTA, it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.[28] As such, it can be reasonably inferred that the Proposed Project's operations would not create perceptible vibration impacts to the nearest sensitive receptors. A less than significant impact would occur pertaining to vibration impacts from the Proposed Project's operation.

4.13-c 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 campus is not located within an airport land use plan and there are no public or private airports or airstrips within 2 miles of the campus. The nearest airport to the Proposed Project's site is the Santa Monica Municipal Airport, located at 3233 Donald Douglas Loop South in the City of Santa Monica, approximately 2.4 miles to the southeast; the campus is not located within the Santa Monica Municipal Airport CNEL contours.[29] Therefore, the Proposed Project's implementation would not expose people residing or working in the campus area to excessive airport noise levels. No impact would occur.

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[27] Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*, Table 7-5: Construction Vibration Damage Criteria.

[28] Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual.

[29] City of Santa Monica, Calendar Year 2018 CNEL Contours Santa Monica Municipal Airport, Exhibit 3-4, Year 2018 CNEL Contours Santa Monica Airport.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
POPULATION AND HOUSING. Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Overview

The Proposed Project's site is in the City Santa Monica on an existing school site. No residences are proposed as part of the Proposed Project that would directly generate new population in the surrounding neighborhoods or within the area served by the District.

Discussion of Impacts

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

***No Impact*.** The campus is located within an established school campus, and no new roads or extensions of existing roads are proposed. The Proposed Project does not include the construction of any new homes or businesses**.** As discussed in Section 3.0, Project Description, of this IS/MND, construction activities of the Proposed Project would demolish and remove eight existing portable buildings, two existing modular buildings, and one existing permanent building; construct three new buildings; and renovate two existing buildings and outdoor areas on the existing school campus and adjacent satellite facility. Implementation of the Proposed Project would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change. Similar to other construction projects in the region, the Proposed Project's construction workers are expected to be drawn from the large, available regional labor force, who would commute to the campus during the construction phases. As such, the Proposed Project would not induce construction employees to move to the Proposed Project's vicinity. Therefore, no direct or indirect increases in population growth would result with the Proposed Project's implementation, and no impact would occur.

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

***No Impact*.** As discussed above, the Proposed Project is located within an established school campus. The Proposed Project would not involve the removal or relocation of any housing and would therefore not displace any people or necessitate the construction of any replacement housing. No existing residences would be displaced or removed as a result of the Proposed Project. No impact would occur.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 following public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☐	☒

Overview

Fire Protection

The City of Santa Monica Fire Department (SMFD) provides fire protection and emergency medical services to the campus. The SMFD operates five fire stations throughout the City that respond to over 16,000 calls for service each year (Santa Monica n.d.-a). As of 2019, the SMFD consisted of over 130 firefighters and civilian employees (Post 2019). The SMFD provides full-time fire and paramedic services, fire prevention, urban search and rescue, hazardous material response, and airport firefighting capabilities. The fire station closest to the Proposed Project's site is Station #3 located at 1302 19th Street, approximately 1.1 miles south. Fire Station 3 has two paramedic-staffed fire engines and its crews respond to all fire and life safety emergencies in their district, including medical emergencies (Santa Monica n.d.-b).

Police Protection

The Santa Monica Police Department (SMPD) provides law enforcement services to the Proposed Project's site. The police department is located at 333 Olympic Drive, approximately 2.9 miles southwest of the Proposed Project's site. As of 2018, the SMPD had 462 staff positions, including 206 sworn police officers. SMPD personnel are organized into five divisions: Office of the Chief, Special Operations, Criminal Investigations, Patrol Operations, and Professional Services. Additionally, the SMPD has a Neighborhood Resource Office Program, comprising eight officers that are assigned to four geographic areas within the City and work alongside Crime Prevention Coordinators to address issues affecting the neighborhood. The campus is located within Beat 4 for the Neighborhood Resource Office Program (Santa Monica n.d.-c).

Schools

The SMMUSD serves 9,200 students in transitional kindergarten through 12th grade in nine elementary schools, three middle schools, two comprehensive high schools, a continuation high school, a K–8th grade

alternative school, and Project-Based Learning High School pathway. The District is also home to 11 early childhood education centers and an adult school. The SMMUSD's annual budget for the 2021-2022 school year is $172 million (SMMUSD 2022a).

Parks

Park, recreation, and open space resources, facilities, and services in the City are managed by the City of Santa Monica Community and Cultural Services Department. The City maintains 32 parks as well as the Civic Auditorium, four community gardens, Cove Skatepark, Annenberg Beach House, the Swim Center, and the Santa Monica Pier. In addition, the Santa Monica State Beach is 3 miles long, covering 245 acres along Santa Monica Bay (Santa Monica n.d.-d).

Other Public Facilities

Other public facilities in the City include public libraries and City facilities. The Santa Monica Public Library (SMPL) has five branch libraries that serve the City (SMPL 2022). The closest branch library to the Proposed Project's site is the Montana Branch Library, located at 1704 Montana Avenue, 0.6 miles west. City facilities include the PAL Youth Center, Camera Obscura Art Lab, Ken Edwards Center, and Miles Playhouse (Santa Monica n.d.-d).

Discussion of Impacts

4.15-a Fire protection?

Less than Significant Impact. The campus is already served by the SMFD. The Proposed Project is not anticipated to create an additional burden on the department as the Proposed Project's implementation would not increase the capacity of the school, nor would the attendance boundaries change. During the Proposed Project's construction, which would span multiple years, notice to and coordination with the SMFD would be ongoing and emergency access to all portions of the Proposed Project's site would be maintained. Phase 1 of the Proposed Project would add a fire truck turn lane within the southwestern portion of the campus and install a fire water line to reach the central campus area, ensuring that all subsequent phases of the Proposed Project would have continued access to fire protection. Additionally, the Proposed Project would be developed in accordance with applicable City, county, and state regulations, codes, and policies pertaining to fire hazard reduction and protection. As the Proposed Project would not increase capacity and would comply with existing requirements, impacts related to fire protection would be less than significant.

4.15-b Police protection?

Less than Significant Impact. The campus is already served by the SMPD. The Proposed Project is not anticipated to create an additional burden on the department as implementation of the Proposed Project would not increase the capacity of the school, nor would the attendance boundaries change. During construction of the Proposed Project, which would span multiple years, notice to and coordination with the SMPD would be ongoing and emergency access to all portions of the Proposed Project's site would be maintained. Additionally, any construction-related traffic would be coordinated with operations of the school, ensuring that trucks are not

moving in or out during drop-off or pickup times. During operation, new school buildings would include the same security features as is currently existing, including an active alarm system and exterior lighting for improved visibility. As the Proposed Project would not increase capacity, impacts related to police protection would be less than significant.

4.15-c Schools?

***No Impact*.** The Proposed Project would help meet the goals of the District through updating the campus to have adaptable learning spaces, larger classrooms, larger multipurpose rooms, new shared spaces, and more recreational/open space. The Proposed Project would increase the campus building area by approximately 24,685 square feet (from 67,581 square feet to 92,266 square feet), which would allow for more classrooms and storage, and creation of flexible teaming spaces which can be split into additional classrooms. The planned two-story building at the campus perimeter would open up the heart of the campus for better visibility and more shared activities while providing a clearer security perimeter. As such, the Proposed Project would have a beneficial impact to the District. Additionally, implementation of the Proposed Project would not increase the capacity of the school, nor would the attendance boundaries change. Therefore, the Proposed Project would not create a need for new or expanded schools and no impact would occur.

4.15-d Parks?

***Less than Significant Impact*.** An increase in population or housing is generally associated with an increase in demand for parks. The Proposed Project would not increase the capacity of the school nor result in an increase in housing or population in the City. Therefore, the Proposed Project would not result in substantial adverse physical impact 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 following public services. Impacts in this regard would be less than significant.

4.15-e Other public facilities?

No Impact. An increase in population or housing is generally associated with an increase in demand for other public facilities. As the Proposed Project would not increase the capacity of the school nor result in an increase in housing or population in the City, the Proposed Project's implementation would have no impact on other public facilities.

4.16 RECREATION

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Overview

The City of Santa Monica Community & Cultural Services (CCS) Department is responsible for overseeing park planning, programming, and staffing the Recreational and Parks Commission. The CCS Department's Open Space Management Division develops policy and coordinates all park and beach-based services. The City of Santa Monica Community Maintenance Department is responsible for the daily ongoing management and operation of all recreational facilities and parks in Santa Monica. Additionally, the City of Santa Monica Public Works Department is responsible for providing park maintenance for the City's parks, open space, medians, City facilities, and the Civic Center complex, as well as parks and recreation facilities, such as ball fields, courts, playgrounds, swimming pools, and gardens.

The City currently maintains 32 public parks located throughout the City (City of Santa Monica 2022a). Recreational resources in the City include recreational facilities, senior centers, parks, open space, beach parks, children's playgrounds, school parks, softball and other sport fields/courts, and community gardens. Access to parks and recreational facilities is further expanded through a joint agreement between the City and the SMMUSD for the use of recreational facilities at public schools within the area.

Parks and recreational facilities maintained by the City within the vicinity of the campus include Douglas Park, approximately 0.4 miles to the southeast; Colorado Center Park, approximately 0.9 miles to the southeast; and Christine Emerson Park, approximately 1.4 miles to the southwest. Will Rogers State Historic Park lies approximately 1.8 miles to the northwest, with the larger Topanga State Park and the Santa Monica Mountains just beyond to the northwest.

Discussion of Impacts

4.16-a Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

***Less than Significant Impact*.** The City of Santa Monica and the SMMUSD entered into a Master Facilities Use Agreement in May 2012 that was renewed in 2022. The agreement allows the City and the community to use the District's school facilities, including the Franklin Elementary School

campus. Under the Master Facilities Use Agreement, the Franklin Elementary School playfields, recreational facilities, and buildings are available for non-school programming rentals when school and school programs are not in session. The Master Facilities Use Agreement includes a Playground Partnership Agreement that provides recreation space use at Franklin Elementary School—including the playground facing Idaho Avenue, the athletic facilities (soccer field and basketball courts), and lawn areas along Montana Avenue—to Santa Monica children and families on weekends and during school breaks when school is not in session.

Under existing conditions, authorized groups may utilize the school facilities at these times: during the school year on weekends (Saturday and Sunday) from 9:00 a.m. to 5:00 p.m. Pacific standard time (PST) and 9:00 a.m. to 6:00 p.m. Pacific daylight time (PDT); weekdays during District holidays, 9:00 a.m. to 5:00 p.m. (with no school programming) and 2:00 p.m. to 5:00 p.m. (during school programming); weekdays during non-summer school breaks, 9:00 a.m. to 5:30 p.m. PST and 9:00 a.m. to 6:30 p.m. PDT; and weekdays during summer break, 9:00 a.m. to 6:30 p.m. (non-summer school) and 2:00 p.m. to 6:30 p.m. (during summer school). The community uses the playfield frequently, almost every day after school and every weekend.

The Proposed Project proposes to replace and/or improve a number of existing recreational facilities on-site. As discussed in Section 3.4 of Section 3.0, Project Description, of this IS/MND, Phase 1 of the Proposed Project includes playfield improvements consisting of modifying and resurfacing the existing field to include a walking surface around the field and reorienting the space to accommodate three full basketball courts (from the existing two full and two half basketball courts). The playfield may be resurfaced with synthetic turf that utilizes a composite, sustainable fill material such as cork, and would be designed to allow adequate drainage flow. Additionally, Phase 3 includes upgrades to the outdoor transitional-kindergarten facility, such as refinishing the asphalt play surface and installing shading.

No increase in student population would occur with the Proposed Project as proposed and, therefore, increased demand on the school's recreational amenities would not occur. The Proposed Project would not involve construction of recreational facilities beyond what is proposed to serve the existing and future students (as well as the public under continued implementation of the Master Facility Use Agreement). As the proposed facilities and upgrades would be adequate to serve the existing and future student population, increased demand for off-site recreational resources, parks, or other facilities within the City is not anticipated as a result with the Proposed Project's implementation.

As such, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that the substantial physical deterioration of recreational facilities would occur or be accelerated. Impacts would be less than significant in this regard.

4.16-b Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than Significant Impact. Refer to Response 4.16-a, above. The campus is currently developed/disturbed with the existing elementary school facilities and associated recreational

amenities. However, the Proposed Project's implementation would result in development of new and/or improved recreational facilities on the school property.

As such, the Proposed Project would include recreational facilities, and/or or require the construction or expansion of recreational facilities, that may have the potential to result in an adverse physical effect on the environment, including impacts relative to air quality, biological and cultural/tribal cultural resources, hydrology/water quality, and/or noise, among others. The improvements as proposed have been evaluated herein in this Initial Study to determine whether physical impacts to the environment would occur, and mitigation measures identified, as appropriate, to reduce any such impacts to less than significant (e.g., refer to Section 4.3, Air Quality; Section 4.4, Biological Resources; Section 4.5, Cultural Resources; Section 4.12, Noise, and other sections for such discussions in Section 4.0 of this Initial Study). Impacts would be less than significant (with mitigation incorporated) in this regard.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
TRANSPORTATION. Would the Project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Overview

The campus is located in central Santa Monica in an urbanized residential and built-out portion of the City. The main entrance to the campus and student drop-off/pickup area is off Montana Avenue, which bounds the school campus on the northwest. The main campus is bordered by 23rd Place to the southwest, 24th Place to the northeast, and Idaho Avenue on the southeast. The Proposed Project's site is three blocks or approximately 2,000 feet northwest of Wilshire Boulevard, approximately 1.25 miles north of Interstate 10, 2 miles southwest of Interstate 405, and 1.75 miles northeast of Santa Monica State Beach and the Pacific Coast Highway.

The closest airport to the campus is the Santa Monica Airport, located approximately 2.2 miles southeast. However, the airport will be closed permanently after December 31, 2028 (City of Santa Monica 2020). The next closest airport is Los Angeles International Airport, approximately 7.4 miles south of the Proposed Project's site.

Discussion of Impacts

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

***No Impact*.** The Proposed Project would be located entirely within the boundaries of the existing Franklin Elementary School campus, with the exception of construction-related vehicles, such as haul trucks, equipment delivery trucks, and worker vehicles that would travel to and from the Project site. The Proposed Project does not include any permanent or temporary modifications to the City of Santa Monica's existing circulation system, including transit, roadway, bicycle, or pedestrian facilities. During construction and operation, there would be no changes to access or pickup/drop-off areas. Therefore, the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. No impact would occur.

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

Less than Significant Impact. CEQA Guidelines section 15064.3 pertains to the assessment of a project's potential transportation impacts based on the vehicle miles traveled (VMT) generated by a project (i.e., "the amount and distance of automobile travel attributable to a project," Section 15064.3[a]). The Proposed Project would shift the overall design of the campus and would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school. The Proposed Project would not result in more vehicle trips to and from the school during operation of the Proposed Project when compared to existing conditions. In addition, the Proposed Project would not modify primary site access locations and traffic patterns—two factors that could potentially result in an increase in average trip lengths. Because total VMT is a function of the total number of trips multiplied by the average trip lengths, the Proposed Project would not result in a VMT increase. Therefore, impacts would be less than significant.

Although the Proposed Project would generate vehicle trips during construction, CEQA Guidelines section 15064.3 addresses the long-term permanent VMT associated with land use development projects and is not specifically concerned with vehicle trips generated during the construction of a project. Therefore, the Proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 (b).

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

***Less than Significant Impact with Mitigation*.** The Proposed Project would shift the overall design of the campus, resulting in increased campus building area with increased classrooms and storage, and creation of flexible teaming spaces. No changes outside of the existing campus boundaries would occur and the use of the school would remain unchanged. During construction, vehicles associated with construction personnel commute trips would be a compatible use on the local road networks. However, as the Proposed Project's site is located within a residential neighborhood, haul trucks and equipment deliveries to and from the Proposed Project's site throughout the day may increase hazards. Thus, implementation of mitigation measure **TR-1** would be required during construction to reduce impacts to less than significant. Operation of the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses.

Mitigation Measure:

TR-1 During each phase of construction activity, the SMMUSD shall work with the City of Santa Monica Public Works Department to develop and implement a Construction Traffic Mitigation Plan that is specific to the needs of each phase and shall include the following:

- Haul trucks and vendor truck traffic ingress and egress to/from the Project site shall not occur 30 minutes before or after student arrival and dismissal times:
    - 8:30 a.m. Monday through Friday;

- 1:30 p.m. on regular days and at 11:30 a.m. on minimum days, for kindergarten;
- 2:45 p.m. on regular days and at 1:30 p.m. on Wednesdays and minimum days, for first and second grades; and
- 3:00 p.m. on regular days and at 1:30 p.m. on Wednesday and minimum days, for third through fifth grades.

- Administrators at Franklin Elementary School shall educate students and parents on drop-off and pickup routes and procedures for each phase of construction, if different from the previous. This may be achieved with a combination of information bulletins shared with students and parents.
- The use of portable message signs and information signs at construction sites shall be employed as needed.

Level of Significance: Less than significant with mitigation incorporated.

4.17-d Result in inadequate emergency access?

***Less than Significant Impact*.** Construction of the Proposed Project would span multiple years and occur in phases. However, all construction activities would be confined to the Proposed Project's site with the exception of haul trucks and construction worker trips. Any construction-related traffic would be temporary and coordinated with operations of the school, ensuring that trucks are not moving in or out during drop-off or pickup times and emergency access is not impeded. During construction, ingress and egress to the Proposed Project's site would be maintained at all times. Notice to and coordination with emergency service providers, including the SMFD and SMPD, would be ongoing regarding the construction schedule and worksite traffic control plans so as to coordinate emergency response routing and maintain emergency access. During operation, emergency access to the Proposed Project's site would remain similar to existing conditions, with the exception that Phase 1 of the Proposed Project would add a fire truck turn lane within the southwestern portion of campus. Therefore, construction and operation of the Proposed Project would result in less than significant impacts related to inadequate emergency access.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. 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:				
a) 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	☐	☐	☒	☐
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Overview

Assembly Bill 52

Assembly Bill (AB) 52 requires the lead agency (in this case, SMMUSD) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project prior to the release of a negative declaration, mitigated negative declaration, or EIR if: 1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of development projects proposed within the geographic area that is traditionally and culturally affiliated with the tribe, and 2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code Section 21080.3.1[d]). Pursuant to AB 52, SMMUSD has compiled a list of California Native American tribes that have requested consultation regarding development projects on lands with which such tribes were culturally and traditionally affiliated. These tribes include the Torres Martinez Desert Cahuilla Indian tribe and the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation). Additional discussion is provided below.

AB 52 Tribal Consultation

Pursuant to AB 52 requirements, notification letters were prepared by the District and sent to Mr. Michael Mirelez, Cultural Resources Coordinator, of the Torres Martinez Desert Cahuilla Indians and Mr. Andrew Salas, Chairman, of the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation) via email on May 13, 2022 and registered mail on May 16, 2022. The letter sent to the tribes by the District included a detailed Proposed Project description, maps of the Proposed Project's site and location, and a request for information regarding the Proposed Project's potential to impact tribal cultural resources.

No response was received from the Torres Martinez Desert Cahuilla Indians within the 30-day response period. On May 19, 2022, the SMMUSD received an email from Mrs. Chloe Soto, Administrative Specialist of the Gabrieleño Band of the Kizh Nation with a letter attached from Mr. Andrew Salas, Chairman, dated May 19, 2022. The letter indicated that the Proposed Project's site is located within the Ancestral Tribal Territory of the Kizh Nation, and that the tribe's Tribal Government was requesting to schedule consultation with the SMMUSD to discuss the Proposed Project and surrounding location in further detail.

On May 25, 2022, the SMMUSD responded to Mrs. Soto's request in an email identifying specific dates and times of availability of SMMUSD staff, including Carey Upton, SMMUSD's Chief Operations Officer, to hold a virtual meeting to discuss the tribe's request. Pursuant to AB 52 regulations, a tribe is given a period of 30 days in which to reply to a lead agency's outreach in response to tribal request for consultation; no response from any member of the Gabrieleño Band of the Kizh Nation was received subsequent to the District's May 25, 2022 correspondence. As such, the response period has closed and all consultation requirements under AB 52 are considered to be fulfilled.

Known Resources within the Proposed Project's Area

The analysis as discussed below is based on the Franklin Elementary School Campus Plan; the Historic Resources Inventory Report for Franklin Elementary School (ARG 2022; see Appendix B-1); and results of consultation efforts between the SMMUSD and the affected tribes, pursuant to AB 52 requirements.

Discussion of Impacts

4.18-a. Cause a substantial adverse change in the significance of a tribal cultural resource 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 discussed in Section 4.5, Cultural Resources, based on the findings of the Historic Resources Inventory Report (ARG 2022; see Appendix B-1), the original campus building (Main Building), which has served as the historical anchor of the Franklin campus, was determined to be individually eligible for listing in the California Register of Historical Resources under Criteria 1 and 3, and for local (City of Santa Monica) listing under Criteria 1, 4, and 5. The evaluation also included the lawn at the front (north) of the Proposed Project's site. No other buildings or improvements on the Franklin Elementary School campus were identified as potential historical resources.

The proposed improvements would result in limited visual changes to the façade of the original Main Building of the school; however, the Proposed Project has been designed to minimize such alterations so as to maintain the visual character and integrity of the original building. The Main Building, including its associated landscaping, would be retained during all phases of the Proposed Project. The Proposed Project would result in some alteration of the Main Building during Phase 3, which would involve interior renovations on the first floor of the building; however, such alterations were determined to not materially impair the physical characteristics that convey the significance of the resource.

Additionally, interior spaces within the Main Building have previously been modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. Therefore, the Main Building would maintain integrity of setting following the Proposed Project's implementation and would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark. As indicated in Section 4.5, Cultural Resources, potential impacts to designated historical resources would be avoided through the Proposed Project's design, and therefore, a significant impact would not result with the Proposed Project's implementation.

As stated above, no known tribal cultural resources 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), that could be impacted by the Proposed Project have been identified; refer to Section 4.5, Cultural Resources, for additional discussion. Impacts would be less than significant in this regard.

4.18-b Cause a substantial adverse change in the significance of a tribal cultural 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact with Mitigation Incorporated. The campus has been developed and used for school-related activities for many years. As stated above, no known significant cultural or tribal cultural resources have been identified within the Proposed Project's area based upon correspondence with relevant Native American tribes to date. However, unanticipated and accidental archaeological discoveries are possible during the Proposed Project's implementation, in particular during on-site grading and excavation activities.

For the reasons above, the Proposed Project is not anticipated to result in impacts to a resource determined by the lead agency to be significant pursuant to established criteria set forth in subdivision (c) of Public Resources Code section 5024.1. However, as the potential for the Proposed Project's construction to impact unknown tribal cultural resources does exist, mitigation measure **CUL-1** would be implemented to reduce potential impacts to a level of less than significant. Mitigation measure CUL-1 would require the District to demonstrate that a qualified, on-call archaeologist is retained prior to each Phase of construction to observe the Proposed Project's grading and other significant ground-disturbing activities; training of construction personnel in the protection of cultural resources, prior to the commencement of the Proposed Project's construction; cessation of the Proposed Project's construction activities if unknown resources are found in order to allow for evaluation of potential significance; and proper documentation and treatment of the find, consistent with applicable federal, state, and local regulations. With implementation of mitigation measure **CUL-1,** potential impacts on tribal cultural resources would be reduced to less than significant. Refer also to Section 4.5, Cultural Resources, for additional discussion.

Mitigation Measure: Implement Mitigation Measure **CUL-1**.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Overview

The City of Santa Monica Department of Public Works is responsible for wastewater, water, storm drainage and solid waste services for the City, including the Franklin Elementary School campus.

Wastewater Collection and Treatment

Wastewater infrastructure in the City, including the Proposed Project's site, is maintained by the Santa Monica Water Resources Division. The City's wastewater system includes approximately 152 miles of pipelines, two flow monitoring and sampling stations and one 26 million gallon per day (MGD) pumping station. Wastewater generated in the City is currently conveyed to the City of Los Angeles' Hyperion Treatment Plant for treatment. On average, 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day. Because the amount of wastewater entering the plant can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 MGD and peak wet weather flow of 800 MGD (City of Los Angeles 2022). In FY 2018-2019, Franklin Elementary School generated approximately 2.2 million gallons of wastewater, or approximately 185,000 gallons of wastewater per month (SMMUSD 2022b).

Water Services

The City currently provides over 10,500 acre-feet of water annually to approximately 18,400 service connections, including to institutional uses such as schools, which account for 3 percent of total water usage in the City. In FY 2018-2019, Franklin Elementary School used approximately 2.2 million gallons of water, or approximately 185,000 gallons of water per month (SMMUSD 2022b). The District has goals to reduce water consumption by 20 percent compared to the 2017-2018 baseline by 2025, and by 30 percent by 2030. To achieve this, the District is working with the City to implement water conservation and efficiency measures, such as installing faucet aerators; high-efficiency shower heads, toilets, and urinals; irrigation system repairs and controllers; and water monitoring software. The District is also working with the City of Malibu to install flow restrictors and pre-rinse spray valves for food service facilities.

The City of Santa Monica's 2020 Urban Water Management Plan (UWMP) provides water supply and demand information through 2040. As discussed in the UWMP, the City supplies potable water through a combination of local groundwater from the Santa Monica Groundwater Basin (60-70 percent) and water purchased from the Metropolitan Water District of Southern California (30-40 percent) (City of Santa Monica 2021). The water supply available to the City is identified in the UWMP and is based on three water supply condition scenarios: average/normal water year, single dry water year, and multiple dry water years. As shown in **Table 4.19-1**, the City has adequate water supply to meet projected demand through 2040 for all scenarios.

TABLE 4.19-1 WATER SUPPLY AND DEMAND

	Water Supply and Demand by Year (acre-feet)			
	2025	**2030**	**2035**	**2040**
Normal Year Scenario				
Supply	18,626	18,626	18,626	18,626
Demand	14,291	15,102	15,177	15,262
Supply/Demand Difference	+4,335	+3,524	+3,449	+3,364
Single Dry Year Scenario				
Supply	15,508	15,508	15,508	15,508
Demand	14,291	15,102	15,177	15,262
Supply/Demand Difference	+1,217	+406	+331	+246
Multiple Dry Years Scenario[1]				
Supply	16,766	16,766	16,766	16,766
Demand	14,291	15,102	15,177	15,262
Supply/Demand Difference	+2,475	+1,664	+1,589	+1,504

Source: City of Santa Monica 2021.

[1] Multiple Dry Years Scenario includes the average supply and demand for the five consecutive dry years from Table 7-5 of the 2020 UWMP.

Storm Drainage

The City's storm drainage system consists of drains, laterals, pumps and catch basins, which are maintained by the Santa Monica Public Works. Storm drains are intended to take rainwater straight to the ocean to avoid area flooding. The Santa Monica Urban Runoff Recycling Facility (SMURRF) treats an average of 500,000 gallons per day (gpd) of dry-weather urban runoff. Treated water from SMURRF is sent through a City-wide non-potable water distribution system that serves parks, medians, Woodlawn Cemetery, and dual-plumbed buildings for toilet flushing. The non-potable water is also used by City operations for street sweeping, sewer jetting, and pressure washing (City of Santa Monica 2022b).

Solid Waste

The District has adopted a solid waste program that strives to minimize waste production and landfill disposal resulting from daily operations and construction activities through the implementation of comprehensive waste minimization, reuse, recycling, organic waste, and education programs. The District has a goal of reducing total waste generation by 10 percent compared to the 2017-2018 baseline by 2025, and by 20 percent by 2030. The District also has a goal to increase diversion from landfills to 85 percent by 2030. Current initiatives include water bottle filling stations, banning plastic straws and containers, reusing green waste, and a trash-free lunch program, the latter of which Franklin Elementary participates in. The District is also committed to managing construction and demolition waste using waste prevention/diversion principles and strives to exceed the CalGreen (California Building Standards Code, Part 11) waste diversion requirements. According to the 2019 Districtwide Plan for Sustainability, Franklin Elementary School generated 229,416 pounds of waste, made up of 169,403 pounds of landfill waste, 50,193 pounds of recyclables, and 9,280 pounds of green waste, and had a diversion rate of approximately 26 percent in FY 2017-2018.

The City of Santa Monica has a Zero Waste Strategic Plan, last updated in 2019, to identify the new policies, programs and infrastructure that will enable the City to reach its zero waste goal of 95 percent diversion by 2030, or a per capita disposal rate of 1.1 pounds per person per day. Based on the 2019 update, the City will need to dramatically decrease disposal in order to meet its goal (City of Santa Monica 2019).

The Santa Monica Resource and Recycling Division provides solid waste and recycling collection in the City. The majority of the City's solid waste is disposed of at the Chiquita Canyon Sanitary Landfill. According to the figures published by the California Department of Resources Recycling and Recovery in 2019, the Chiquita Canyon Sanitary Landfill received approximately 64 percent of the City's waste, or 46,256 tons; Sunshine Canyon City/County Landfill received 24 percent, or 17,452 tons; and other landfills throughout the state received approximately 12 percent, or 8,824 tons (CalRecycle 2019). As of August 2018, the Chiquita Canyon Sanitary Landfill had a remaining capacity of 60,408,000 million cubic yards with a maximum permitted throughput of 12,000 cubic yards (CalRecycle 2018a). As of May 2018, the Sunshine Canyon City/County Landfill had a remaining capacity of 77,900,000 million cubic yards with a maximum permitted throughput of 12,100 cubic yards (CalRecycle 2018b).

Discussion of Impacts

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

***Less than Significant Impact*.** The Proposed Project would not increase capacity as part of the Proposed Project. No additional demand for water from the City's water supply or increase in wastewater flows entering the City's wastewater treatment plant is anticipated. The newly constructed buildings would include water and energy conservation features that would be more efficient than existing systems, including low-flow plumbing that would serve to reduce the amount of wastewater entering the City's system. The Proposed Project would not require the construction of new water or wastewater facilities that would result in a physical impact to the environment. Impacts would be less than significant.

The school is connected to the City of Santa Monica's storm drain system. Implementation of the Proposed Project would not substantially increase impervious surfaces within the campus; refer also to discussion under Section 4.10, Hydrology and Water Quality. The drainage facilities at Franklin Elementary School campus are sufficient to accommodate this increase in stormwater runoff, prior to discharge to the City of Santa Monica's storm drain system. The Proposed Project would require the construction of new stormwater drainage facilities that would result in a physical impact to the environment. Impacts would be less than significant.

No electric power, natural gas, or telecommunications facilities would be relocated, constructed, or expanded as a result of the Proposed Project. No impact would occur related to these facilities.

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

***Less than Significant Impact*.** Construction of the Proposed Project would require nominal amounts of water for activities, such as dust suppression and washing equipment. These activities would not result in significant water demand and would cease after construction is complete. During operation, the Proposed Project would not result in substantially more water than existing conditions as the Proposed Project would not increase capacity. Additionally, the new school buildings would be designed to meet the California 2022 Building Code, including Title 24, which would require installation of water conservation features, such as faucet aerators and high-efficiency toilets, and urinals. As shown in Table 4.19-1 above, the City has adequate water supply to meet projected demand through 2040 during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.

4.19-c Result in a determination by the wastewater treatment provider that 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?

***Less than Significant Impact*.** The Proposed Project would continue to be provided sanitary sewer service by the City of Santa Monica through its wastewater collection and treatment system, similar to existing conditions. As no increase in capacity is associated with development of the

Proposed Project, the Proposed Project would not result in substantially greater wastewater collection and treatment demand than that associated with current operations at the Proposed Project's site. Impacts would be less than significant.

4.19-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*.** During construction, the Proposed Project would generate solid waste from demolition of existing buildings and pavement. However, the Proposed Project is required to comply with construction and demolition waste prevention and diversion principles set by the District, which strives to exceed the CalGreen waste diversion requirements. Additionally, the generation of construction and demolition waste would cease once construction is complete. During operation, as no increase in student population is anticipated with development of the Proposed Project, the Proposed Project would not significantly increase the amount of solid waste already generated by Franklin Elementary School. Additionally, the school would continue participating in the District's initiatives to increase diversion from landfills. Solid waste would continue to be disposed of at the Chiquita Canyon Sanitary Landfill, which has projected adequate capacity through 2047, the Sunshine Canyon City/County Landfill, which has projected adequate capacity through 2037, and other landfills throughout the state. The Proposed Project would not substantially increase solid waste in the City and existing landfills have sufficient capacity to accommodate the relatively minor amounts of waste that would be generated by the Proposed Project. Impacts would be less than significant.

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

***Less than Significant Impact*.** The Proposed Project would comply with all federal, state, and local statutes regarding solid waste. Impacts would be less than significant.

4.20 WILDFIRE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Overview

According to current CalFire maps, the campus is not located in a State Responsibility Area (SRA) or a fire hazard severity zone (FHSZ); however, the site is designated as a Local Responsibility Area (LRA) (CalFire n.d). As such, the Proposed Project would not result in a significant impact relative to wildfire, as discussed below.

Discussion of Impacts

4.20-a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As stated above, the campus is not located in or near a SRA or lands classified as very high fire hazard severity zones (VHFHSZ). Therefore, the Proposed Project would not impair an adopted emergency evacuation or response plan within such an area. No impact would occur in this regard.

4.20-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?

No Impact. The Proposed Project site is not located in or near a SRA or lands classified as VHFHSZ. Therefore, the Proposed Project, due to slope, prevailing winds, and other factors, would not exacerbate wildfire risks or expose the Proposed Project's occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire within such an area. No impact would occur in this regard.

4.20-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?

No Impact*.* The Proposed Project site is not located in or near a SRA or lands classified as VHFHSZ. The Proposed Project would not 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 within such area. No impact would occur in this regard.

4.20-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?

No Impact*.* The Proposed Project site is not located in or near a SRA or lands classified as VHFHSZ. Therefore, the Proposed Project would not 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 within such an area. No impact would occur in this regard.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the Project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion of Impacts

4.21-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 wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact with Mitigation Incorporated. The campus is currently developed and located in an urban residential setting. No riparian habitat or other natural habitat as designated by the CDFW and USFWS are present. The potential for the presence of special-status species to occur at the site is limited as vegetation and animal species supported in the limited ornamental landscaping include species that are commonly found in urban environments. However, the analysis provided herein determined that the Proposed Project has the potential to directly or indirectly impact nesting birds if construction activities occur during the nesting season (February 1 through August 31). Conformance with the requirements of the MBTA would ensure potential impacts on nesting birds are reduced to less than significant.

Athough no known cultural or tribal cultural resources are present on-site, mitigation measure **CUL-1** would be implemented to ensure that the Proposed Project's impacts to undiscovered cultural and/or tribal cultural resources are reduced to less than significant. Refer to Section 4.5, Cultural Resources, and Section 4.18, Tribal Cultural Resources.

With incorporation of such mitigation, the Proposed Project would not 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 rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Implement mitigation measure **CUL-1**.

Level of Significance: Less than significant with mitigation incorporated.

4.21-b Does the Project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less than Significant Impact. The Proposed Project would not result in the achievement of short-term environmental goals to the disadvantage of long-term environmental goals. Potential short-term (construction phase) and long-term (operation phase) impacts that could occur as a result of the Proposed Project's implementation have been considered and evaluated herein in Sections 4.1 through 4.20. Such discussions consider the existing environmental setting and conditions; applicable policy and regulatory conditions; Proposed Project's characteristics; and, findings of the Proposed Project's specific technical studies.

Where appropriate, mitigation measures have been identified to avoid potential impacts or to reduce potential impacts to a level of less than significant. The Proposed Project would be required to demonstrate conformance with applicable regulatory requirements at the local, state, and federal level and would not preclude the state from meeting its long-term environmental goals. Additionally, the Proposed Project would be consistent with measures identified in the SMMUSD Sustainability Plan to further ensure that the Proposed Project contributes to meeting the District's adopted goals and objectives for reducing or avoiding potential impacts on the physical environment, as well as those impacts that may contribute to adverse effects felt for generations to come (e.g., climate change and global warming). For the reasons above, the Proposed Project is not considered to have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Impacts would be less than significant in this regard.

4.21-c 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.

Less than Significant Impact with Mitigation Incorporated. A cumulative impact could occur if the Proposed Project would result in an incrementally considerable contribution to a significant

cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. No direct significant impacts were identified for the Proposed Project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the Proposed Project may result in the potential to contribute to a significant cumulative impact.

Similar improvements are being undertaken by the District at several school campuses within the City, including John Adams Middle School, Grant Elementary School, McKinley Elementary School, Will Rogers Learning Community, and Roosevelt Elementary School. Such improvements are anticipated to occur between 2022 to 2029. As such, construction activities would likely overlap with construction of the Proposed Project. McKinley Elementary School and Lincoln Middle School are within closest proximity to the Franklin Elementary School campus and would therefore have the greatest potential to contribute to cumulative impacts, in combination with the Proposed Project. Other development and infrastructure improvement projects are also proposed throughout the City of Santa Monica.

As described in Sections 4.1 through 4.20 of this IS/MND, construction activities associated with the Proposed Project would result in short-term and temporary environmental effects, including: changes to the visual setting; increases in air pollutants and noise levels; erosion and degradation of water quality; potential releases of hazardous materials into the environment; potential disturbance to nesting birds; potential destruction of cultural, tribal cultural, and paleontological resources; and increases in demand for utilities and services. The Proposed Project would also introduce new stationary noise sources. An evaluation of the potential for the Proposed Project to contribute to a cumulatively considerable impact is provided for each of these resource areas.

As discussed in Sections 4.1 through 4.20, the Proposed Project would have no impact related to the following resource areas: agriculture and forestry resources, mineral resources, population and housing, public services, recreation, and wildfire. Therefore, the Proposed Project would not contribute to a cumulative effect to these resources and no further analysis is required.

Aesthetics

The geographic scope for evaluating cumulative aesthetics impacts is the Franklin Elementary School campus and surrounding areas with views to and from the campus. The Proposed Project setting is highly developed and urbanized, with existing views consisting of one- and two-story buildings and ornamental landscaping associated with residential, commercial, and public facilities land uses. The cumulative study area also includes light sources that are characteristic of a typical urban environment, including lighting associated with buildings, wayfinding, sports fields, streets, and vehicles. The City enforces standards to ensure that development complies with regulations governing scenic quality and lighting. Therefore, a less-than-significant cumulative impact exists in the area with respect to aesthetics.

Construction activities associated with the improvements to the Franklin Elementary School, in combination with improvements planned at other SMMUSD schools, could potentially overlap and be visible from neighboring communities. However, construction activities would generally be obscured by temporary fencing and would be short-term. Once constructed, the physical

improvements at both campuses would not obstruct any existing views and would not have the potential to damage any scenic resources. Future development undertaken by the District would be required to comply with City zoning regulations governing scenic quality, as well as the District's BP 7113, which requires campus improvements to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation. As such, the architectural value of the individual school campuses would be preserved for the long-term. To minimize the potential for cumulative lighting effects, all new light sources would be directed on-site and would be of similar intensity as existing light sources in the surrounding area, thereby minimizing the potential to result in a measurable contribution to sky glow or night sky pollution. For the reasons above, the Proposed Project would not result in a cumulatively considerable contribution to cumulative aesthetics impacts.

Air Quality

The geographic scope for evaluating cumulative air quality impacts is the South Coast Air Basin, which is designated as a nonattainment area for ozone and $PM_{2.5}$ with respect to both the NAAQS and CAAQS and a nonattainment area for PM_{10} with respect to the CAAQS. Therefore, a significant cumulative impact exists in the South Coast Air Basin with respect to these criteria air pollutants.

Construction activities associated with the improvements to the Grant Elementary School, McKinley Elementary School, John Adams Middle School, Will Rogers Learning Community, and Roosevelt Elementary School campuses would result in cumulative air pollutant emissions when construction activities overlap with construction of the Proposed Project. Based on the analysis in Section 4.3-b, construction of the Proposed Project would not generate emissions of criteria air pollutants or precursors that would exceed SCAQMD's localized significance thresholds. These thresholds were developed as a metric to indicate whether a project's emissions would cumulatively contribute to the nonattainment designations in the South Coast Air Basin. Criteria air pollutant emissions would be further reduced because the District would require all construction contractors to utilize equipment with Tier 4 engines and comply with SCAQMD Rule 403, which regulates fugitive dust emissions. Health risks from air pollutants would be minor and at sufficient distance to not result in health effects to nearby sensitive receptors. Additionally, vehicle trips generated from construction of these projects would not result in traffic volumes at intersections around the Franklin Elementary School campus that would exceed 100,000 vehicles per day and would not contribute to CO concentrations that exceed standards. Furthermore, impacts related to odors would not be cumulatively considerable because odors would dissipate rapidly from the source with an increase in distance.

Following construction, the Proposed Project would not introduce new stationary sources of emissions. Additionally, the Proposed Project would not increase capacity or enrollment at the school, and therefore would not result in long-term increases in vehicle trips during operations. Therefore, the Proposed Project would not result in operational emissions that would exceed SCAQMD's localized significance thresholds.

The Proposed Project, in combination with the proposed improvements at other District campuses, would not expose sensitive receptors to quantities of pollutants greater than

significance thresholds or to significant risks of adverse health impacts. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Biological Resources

The geographic scope for evaluating cumulative biological resources impacts is the campus and surrounding areas within a 0.5-mile buffer. This area is characterized as highly developed and urbanized and offers limited habitat for sensitive biological resources. Because urbanization has contributed to the loss of habitat, a significant cumulative impact exists with respect to biological resources.

Implementation of the cumulative projects would occur on developed properties with low biological habitat value. However, ornamental trees could potentially provide habitat for migratory birds, and some of the projects could involve removal of these trees. Therefore, a significant cumulative impact on biological resources may occur. All projects are required to comply with the MBTA and implement measures to avoid the take or destruction of nesting birds. The Proposed Project's compliance with MBTA would avoid impacts on nesting birds; therefore, project-level impacts are less than significant. As a result, the Proposed Project would not in a cumulatively considerable contribution to significant cumulative impacts on biological resources.

Cultural Resources

The geographic scope for evaluating cumulative cultural resources impacts is the Southern California region. Significant historic and archaeological resources have been documented within the region; however, many have been destroyed or substantially altered as the result of ongoing development. Although extensive regulations have been adopted for the protection of such resources, many were destroyed during the period before such protection measures were in place through grading and excavation activities associated with construction. For these reasons, a significant cumulative impact exists in the region with respect to cultural resources.

Several of the sites affected by the District's cumulative projects support historic resources and/or districts. As such, implementation of the planned projects would have the potential to adversely affect significant archaeological resources, historical resources, historic districts, and/or contributing resources within historic districts. Should the collective projects result in the removal or destruction of a substantial representation of the historic districts, impacts could be cumulatively significant.

As discussed in Section 4.5, Cultural Resources, the Proposed Project includes building demolition and new building construction on-site. The original campus building (Main Building) on the Franklin Elementary School site was evaluated for historical significance and determined to be individually eligible for listing in the CRHR and for local (City of Santa Monica) listing. The evaluation also included the lawn at the front (north) of the site. No other buildings or site features located on the campus satisfy the definition of a historical resource for purposes of CEQA (ARG 2022a). The Proposed Project does not include demolition or any exterior changes to the Main Building. Demolition activity is limited to eight existing portable buildings, two existing

modular buildings, and one permanent building (Building F), none of which are historical resources. The Main Building, including its associated landscape, would be retained during all phases of the Proposed Project. The Proposed Project would result in some alterations to the Main Building during Phase 3, which would involve interior renovations on the first floor of the building. However, such alterations would be limited to interior spaces. As discussed above, interior spaces in the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. The alterations proposed as part of Phase 3 would not materially impair those physical characteristics that convey the significance of the resource. Therefore, the Main Building would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark following the Proposed Project's implementation.

Additionally, new buildings and outdoor spaces, including the Maker-Space building, classroom building, and cafeteria and culinary education building would not require the demolition or alteration of the Main Building. The new classroom building would result in some changes to the immediate setting of the Main Building by introducing additional massing adjacent to the historical resource, but would not compromise the important spatial relationship that historically and currently exists between the Main Building and Montana Avenue. The sequence of entry from the street, through the lawn, and to the entrance of the Main Building would remain intact. Additionally, the new classroom building would not be physically attached to the Main Building. The Main Building would continue to retain its integrity of setting at the Proposed Project's completion.

For the reasons stated above, the Proposed Project, as designed, would not result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5. For these reasons, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on historical resources.

As discussed in Section 4.5, records search results indicated that no previously conducted studies or previously recorded archaeological sites were identified within the boundaries of the Proposed Project campus, nor within one-quarter mile radius of the campus. As the campus has been previously developed and because of the low sensitivity for archaeological resources, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on archaeological resources. Implementation of mitigation measure **CUL-1** would further protect against the potential for the project to affect unknown buried resources during construction activities.

Energy

The geographic scope for evaluating cumulative energy impacts consists of the service areas for Southern California Edison and Southern California Gas, which are the electric and natural gas service providers for the Proposed Project site. The use of alternative fuels and renewable energy supplies are replacing conventional fossil fuel supplies, thereby contributing to cleaner energy sources. Development in the region has been incorporating more energy efficient design and fixtures to reduce energy consumption in compliance with State regulations, such as CALGreen.

The District has also adopted and has been implementing its Sustainability Plan to improve energy efficiency in existing and new buildings and incorporate renewable technologies, such as solar panels and provision of vehicle charging facilities. Therefore, a less-than-significant cumulative impact exists in the region with respect to energy.

As described in Section 4.6-a, the Proposed Project would increase energy consumption for temporary construction activities related to vehicle use and material transport. However, construction activities would be temporary and would not increase long-term energy or fuel demand. The Proposed Project's energy consumption for building operation would support the State's goals to improve energy efficiency through complying with the California Building Code, providing solar readiness, and decreasing use of grid electricity. The Proposed Project would not develop uses or involve activities that would conflict with goals of: (1) decreasing per capita energy consumption, (2) decreasing reliance on oil (petroleum), and (3) increasing uses of renewable energy sources. Additionally, the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative energy impacts.

Geology and Soils

The geographic scope for evaluating geology and soils impacts is generally site-specific, rather than cumulative in nature. Potential cumulative impacts resulting from soil conditions would be minimized on a site-specific basis as needed via incorporation of standard construction methods and compliance with code requirements. Although Southern California is a seismically active region and is susceptible to various geologic hazards, new development is required to comply with applicable State and local building codes and site-specific geotechnical measure to reduce or avoid the potential to exacerbate existing or result in new geologic hazards. The Proposed Project is not considered to result in a cumulatively considerable contribution to cumulative impacts on geology and soils for these reasons.

The geographic scope for evaluating cumulative impacts on paleontological resources is the Southern California region. Many paleontological resources within the region have been previously destroyed prior to adoption of protective measures at the federal, State, and/or local levels or have been inadvertently destroyed during grading and excavation activities. Such conditions have resulted in the loss of scientific data. Therefore, a significant cumulative impact exists in the region with respect to paleontological resources. The Franklin Elementary School campus is located within an area that has been previously developed and is predominately underlain by fill materials; however, the potential remains for the discovery of unknown paleontological resources during Proposed Project ground related disturbance. Mitigation measure **GEO-1** requires a pre-construction meeting to educate construction workers on the potential for paleontological resources. Mitigation measure **GEO-2** would require paleontological monitoring during ground-disturbing activities and identifies specific procedures to be followed in the event of an unanticipated discovery of a paleontological resource. With implementation of

mitigation measures **GEO-1** and **GEO-2**, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on paleontological resources.

Greenhouse Gas Emissions

The geographic scope for evaluating cumulative GHG impacts is global. GHG emissions contributing to climate change and global warming are inherently a cumulative impact in the context of CEQA. No single project alone would measurably contribute to an incremental change in the global average temperature, or to global, local, or microclimates. GHG emissions are attributable largely to the transportation sector and electricity generation from fossil fuel combustion. New development or operational characteristics from cumulative projects that contribute prominent GHGs contribute to a significant cumulative impact on GHGs.

As discussed in Section 4.8-a, GHG emissions from the Proposed Project would be far below SCAQMD's 3,000 MTCO2e numerical threshold recommended for non-industrial projects and the adoption of sustainable design features by the District would further reduce emissions over the life of the Proposed Project. In addition, the Proposed Project would not conflict with State and local plans for reducing emissions from these activities and sources in order to meet its targets and goals for GHG reduction in 2030 and beyond. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to GHG emissions.

Hazards and Hazardous Materials

The geographic scope for evaluating cumulative hazards and hazardous materials impacts is the Franklin Elementary School campus and adjacent properties. The Franklin Elementary School campus is listed on the DTSC HWTS HAZNET database as a result of the disposal of asbestos containing waste in 1984 and 1994 during previous renovation and modernization efforts. Because ground disturbance and demolition activities in the campus vicinity could release contaminants into the environment, a significant cumulative impact exists in the region with respect to hazards and hazardous materials.

As discussed in Section 4.9, the Proposed Project, as well as other cumulative projects, are subject to local, state, and federal regulatory requirements to evaluate, disclose, and mitigate the potential for releases of hazardous materials into the environment prior to grading activities, if such conditions are suspected or known. Implementation of mitigation measure **HAZ-1** would ensure that such materials would be properly removed, handled, and disposed of. With implementation of such mitigation, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to hazards and hazardous materials.

Hydrology and Water Quality

The geographic scope for evaluating cumulative hydrology and water quality impacts is the watershed within which Franklin Elementary School is located. Development within the watershed has the potential to contribute to increased stormwater runoff volumes and pollutant loads in the storm drain system that discharge to creeks and ultimately to the Pacific Ocean. However new development is required to conform with standard State and local drainage and

grading regulations to control stormwater runoff and regulate water quality. New development occurring within the watershed would be required to demonstrate that stormwater volumes generated following improvement activities would be managed by on-site, and that flooding would not be induced. New projects would be required to comply with applicable local, state, and federal regulations governing stormwater discharge during construction (e.g., NPDES Construction General Permit and SWPPP). Such projects would be subject to review and approval by the affected agencies to ensure that appropriate best management practices are implemented to reduce pollutants in stormwater and avoid adverse impacts to surface water quality. Through implementation of such measures and project compliance on a project level, a less-than-significant cumulative impact exists within the watershed with respect to hydrology and water quality.

As described in Section 4.10, Hydrology and Water Quality, the Proposed Project would result in temporary and localized ground disturbance during construction. The District would be required to demonstrate compliance with NPDES requirements, including design, management, and monitoring in order to protect and maintain water quality and to reduce potential impacts related to storm water discharges during construction through implementation of best management practices. Further, the Proposed Project would result in a similar land use on-site as under existing conditions and would not substantially increase impervious surfaces. For these reasons, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to hydrology and water quality.

Land Use and Planning

The geographic scope for evaluating cumulative impacts related to land use and planning is the campus and immediate vicinity. Development projects within this area are reviewed for consistency with land use policies and zoning regulations to prevent impacts on the public and the environment from incompatible land uses. A less than significant cumulative impact exists in the area with respect to land use and planning.

As discussed in Section 4.11, the Franklin Elementary School campus is zoned for Institutional/Public Lands (PL) and the satellite campus is zoned Multi-Unit Low-Density Residential (R2), and is designated for Institutional/Public Lands (main school campus) and Low Density Housing (adjacent satellite facility) uses in the City's General Plan. Schools are allowable within these designations, as established in Section 9.15.010 of the City's Municipal Code. The Proposed Project would not change the existing land use of the campus and would comply with all applicable zoning regulations, including height standards. Therefore, the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Other development within the campus vicinity would be subject to the same land use polices and zoning regulations. Therefore, the Proposed Project would not result in a

cumulatively considerable contribution to cumulative impacts with respect to land use and planning.

Noise

The geographic scope for evaluating cumulative noise impacts is the campus and immediate surroundings. Noise effects are localized by nature because noise attenuates with increasing distance from the source. The City has established standards to regulate noise levels and protect the public welfare. Therefore, a less-than-significant cumulative impact exists in the area with respect to noise.

The Proposed Project construction activities would result in increases in noise levels. These noise sources would be intermittent, temporary, and would cease at the end of the construction phase. With implementation of mitigation measure **NOI-1**, which requires multiple noise reducing measures, including equipping power construction equipment with noise shielding and muffling devices, implementation of a Construction Mitigation Plan, notification of property owners and occupants within 500 feet of the Project grading limits, placement of stationary construction equipment such that emitted noise is directed away from sensitive receivers, etc., construction-related impacts from the Proposed Project would be reduced to levels that would not be cumulatively considerable. During operations, the Proposed Project would not increase vehicle trips nor increase stationary noise sources to a significant degree. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts on noise.

Transportation

The geographic scope for evaluating cumulative transportation impacts is the transportation network serving the campus. Continued development within the City of Monica has contributed to increased use of the existing transportation network. However, State and local policies have been adopted to encourage the use of alternate modes of transportation, such as walking, bicycling, and taking public transit. A less-than-significant cumulative impact exists in the transportation network serving the campus.

The proposed improvements at Franklin Elementary School would increase vehicle trips on the surrounding roadway network associated with construction worker commutes, haul trips, and the transportation of construction equipment. These trips would be distributed throughout the workday and across multiple roadways. Additionally, construction activities would be temporary and would not result in long-term increases in vehicle trips. The Proposed Project would not increase the existing capacity or enrollment of the schools and hence would not generate permanent increases in vehicle trips. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to vehicle trips.

However, as the Proposed Project's site is located within a residential neighborhood, haul trucks and equipment deliveries to and from the Proposed Project's site throughout the day may increase hazards. Implementation of mitigation measure **TR-1** would require the construction contractor to prepare and implement a Construction Traffic Mitigation Plan to address safety hazards, which would require the scheduling of construction staging and delivery outside of peak

student pick-up/drop-off times, notifying students and parents on drop-off and pickup routes and procedures for each phase of construction (if different than the previous), and use of portable message and information signs at the construction areas, as needed. With implementation of mitigation measure **TR-1**, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to roadway hazards.

Tribal Cultural Resources

The geographic scope for evaluating cumulative impacts on tribal cultural resources is the geographic area that is traditionally and culturally affiliated with the Gabrieleño Band of Mission Indians - Kizh Nation. Past development of lands within the region has contributed to the loss and destruction of tribal cultural resources. Therefore, a significant cumulative impact exists within the region with respect to tribal cultural resources, due to such conditions.

In accordance with AB 52 and PRC section 21080.3.1, the District sent formal notification letters to two Native American tribes that requested notification from the District (Torres Martinez Desert Cahuilla Indians and Gabrieleño Band of Mission Indians–Kizh Nation). No response was received from the Torres Martinez Desert Cahuilla Indians. Correspondence was received from the Gabrieleño Band of the Kizh Nation indicating that the Proposed Project's site is located within the Ancestral Tribal Territory of the Kizh Nation, and that the tribe's Tribal Government was requesting to schedule consultation with the SMMUSD to discuss the Proposed Project and surrounding location in further detail. However, no further response from any member of the Gabrieleño Band of the Kizh Nation was received subsequent to the outreach and correspondence. As such, the response period closed and all consultation requirements under AB 52 are considered to be fulfilled.

Because the project site has been fully developed since the 1930s and no known tribal cultural resources have been identified in the campus, it is not anticipated that tribal cultural resources would be encountered during construction-related ground disturbing activities. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on tribal cultural resources.

Utilities and Service Systems

The geographic scope for evaluating cumulative impacts on utilities and service systems is the City of Santa Monica. The City of Santa Monica is largely built out and existing infrastructure is generally able to serve the utility needs for new development throughout the City. New development continues to occur within the City and has resulted in an incremental increase in demands on water supply, stormwater drainage facilities, wastewater treatment, electricity, telecommunications, and solid waste disposal systems.

The Proposed Project would be required to comply with applicable regulations intended to increase water and energy efficiencies and reduce stormwater discharges and solid waste

generation. Compliance with such measures would reduce potential demands from new development on existing utility providers.

Construction of the Proposed Project would result in the consumption of water, electricity, and natural gas in powering construction equipment and vehicles. Due to the scale of the improvements proposed, such demands are anticipated to be limited, while also being temporary. Operation of the Proposed Project would not result in an increase in student population or staff at the campus, and therefore, would not increase demands on utility providers in this regard. The Proposed Project would not require relocation or construction of new or expanded utilities to serve the proposed campus facilities. Proposed Project compliance with applicable State regulations (e.g. CALGreen) and Districtwide sustainability policies would further reduce water and energy consumption over the life of the project. As such, the Proposed Project is not anticipated to result in a cumulatively considerable contribution to cumulative impacts relative to utilities and service systems.

Summary

The Proposed Project would not have impacts that are individually limited, but cumulatively considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects. All impacts would be less than significant, with or without mitigation incorporated.

4.21-d Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings was considered in the response to certain questions in the following sections: aesthetics; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; noise; population and housing; transportation; and wildfire. As a result of this evaluation, no potentially environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, were identified. Impacts would be less than significant.

As discussed in Section 4.9, Hazards and Hazardous Materials, based on the age of historical and current structures on the Proposed Project's site, there is the potential that hazardous materials may be present, consisting of arsenic (from building materials), lead (from lead-based paint), asbestos (from building materials), pesticides (from prior termite treatment), and polychlorinated biphenyls (PCBs) (in window caulking). These compounds may be present in the shallow soils onsite, and based on their properties, do not have the tendency to migrate. As concluded in the Phase I ESA, it is recommended that a limited Phase II subsurface investigation be conducted in areas of proposed soil disturbance to evaluate shallow soil conditions with respect to the chemicals of concern listed above. Thus, the Proposed Project would incorporate mitigation measure **HAZ-1** which would require preparation of a Phase II subsurface investigation, followed by remediation as applicable based on the results of the Phase II Investigation. As the hazardous materials may be present in shallow soils, the remediation activities are expected to consist of removing any affected soils and hauling them to an appropriate landfill. With implementation of

such mitigation, potential environmental effects that may cause effects on human beings, either directly or indirectly, would remain less than significant.

Conclusion: The Proposed Project has the potential to result in adverse impacts to natural resources (nesting bird species); contribute to elimination of important examples of the major periods of California history or prehistory (e.g., undiscovered cultural or tribal cultural resources); and/or have potential environmental effects that may cause substantial adverse effects on human beings, either directly or indirectly. However, as applicable, impacts would be less than significant or less than significant with mitigation incorporated.

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