

April 2024 | Final Environmental Impact Report  
State Clearinghouse No. 2023010229

# GRANT ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT

for Santa Monica-Malibu Unified School District

*Prepared for:*

**Santa Monica-Malibu Unified School District**  
Contact: Carey Upton, Chief Operations Officer  
1717 4<sup>th</sup> Street  
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310.450.8338

*Prepared by:*

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# 1. Introduction

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## 1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code, §§ 21000 et seq.) and CEQA Guidelines (14 Cal. Code of Regs. §§ 15000 et seq.).

According to the CEQA Guidelines, section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the DEIR;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies that provided comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process;
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the Grant Elementary School Campus Master Plan Project Final EIR (Proposed Project) during the public review period, which began October 30, 2023, and ended December 13, 2023. This document represents the independent judgment of Santa Monica-Malibu Unified School District (SMMUSD or District), who is the Lead Agency for the Proposed Project. This document and the circulated DEIR make up the FEIR, in accordance with CEQA Guidelines section 15132.

## 1.2 FORMAT OF THE FEIR

This document is organized as follows:

***Section 1, Introduction.*** This section describes CEQA requirements and content of this FEIR.

***Section 2, Response to Comments.*** This section provides a list of agencies, organizations, and interested persons commenting on the DEIR, copies of comment letters/emails received during the public review period, and individual responses to written comments. This section also includes responses to written and verbal comments received at a public meeting held by the SMMUSD on November 29, 2023, regarding the DEIR. To facilitate review of the responses, each comment letter and verbal comment has been reproduced and assigned a number (A1 and A2 for letters/emails received from agencies; O1 and O2 for a letter/email received from organizations; and R1 through R14 for letters/emails and verbal comments received from residents). Individual

## 1. Introduction

comments within each letter have been numbered and the letter is followed by responses with references to the corresponding comment number.

**Section 3. Revisions to the DEIR.** This section contains revisions to the DEIR text and figures as a result of the comments received as described in Section 2, and/or minor errors and/or omissions discovered subsequent to release of the DEIR for public review.

The responses to comments contain revisions that have been added to the text of the FEIR. District staff has reviewed this material and determined that none of it constitutes the type of significant new information that requires recirculation of the DEIR for further public comment under CEQA Guidelines section 15088.5. None of the information provided in the FEIR indicates that the Proposed Project will cause a potentially significant new environmental impact not previously disclosed in the DEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified significant environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in CEQA Guidelines section 15088.5.

### 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204(d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code section 21092.5, copies of the written responses to public agencies have been forwarded to those agencies at least 10 days prior to certifying the EIR. The responses have been forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

## 2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency, SMMUSD, to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses to them.

This section provides all written responses received on the DEIR and SMMUSD's responses to each comment. Comment letters/emails and specific comments are given letters and numbers for reference purposes. The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

| Number Reference             | Commenting Person/Agency                               | Comment Format | Date of Comment   | Page No. |
|------------------------------|--|----------------|-------------------|----------|
| <b>Agencies</b>              |  |                |                   |          |
| A1                           | Frances Duong, California Department of Transportation | Email/Letter   | December 5, 2023  | 2-3      |
| A2                           | Tamara Purvis, Department of Toxic Substance Control   | Email/Letter   | December 12, 2023 | 2-11     |
| <b>Organizations</b>         |  |                |                   |          |
| O1                           | Boris Suchkov, Santa Monica Families for Safe Schools  | Email/Letter   | December 12, 2023 | 2-19     |
| O2                           | Laurene von Klan, Climate Action Santa Monica          | Email/Letter   | December 13, 2023 | 2-47     |
| <b>Residents/Individuals</b> |  |                |                   |          |
| R1                           | Trace Hom  | Email/Letter   | October 31, 2023  | 2-57     |
| R2                           | Mario Melgarejo  | Comment Card   | November 29, 2023 | 2-59     |
| R3                           | Commenter #1   | Verbal         | November 29, 2023 | 2-63     |
| R4                           | Commenter #2   | Verbal         | November 29, 2023 | 2-65     |
| R5                           | Commenter #3   | Verbal         | November 29, 2023 | 2-67     |
| R6                           | Diana Williams   | Email          | December 9, 2023  | 2-69     |
| R7                           | Jahan Bruce  | Email          | December 9, 2023  | 2-73     |
| R8                           | Rowan Sullivan   | Email          | December 9, 2023  | 2-81     |
| R9                           | Brian Sweeney  | Email          | December 10, 2023 | 2-85     |
| R10                          | Jacob Wasserman  | Email          | December 11, 2023 | 2-87     |
| R11                          | Sam Shapiro-Kline                                      | Email          | December 12, 2023 | 2-89     |
| R12                          | Connor Webb  | Email          | December 13, 2023 | 2-91     |
| R13                          | Allon Percus   | Email          | December 13, 2023 | 2-93     |
| R14                          | Catherine Kollros                                      | Email          | December 13, 2023 | 2-97     |

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## 2. Responses to Comments

### Comment A1. Frances Duong, California Department of Transportation

|  |                          |   |
|--|--------------------------|---|
| STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY   | GAVIN NEWSOM, Governor   |   |
| <b>DEPARTMENT OF TRANSPORTATION</b><br>DISTRICT 7<br>100 S. MAIN STREET, MS 16<br>LOS ANGELES, CA 90012<br>PHONE (213) 269-1124<br>FAX (213) 897-1337<br>TTY 711<br>www.dot.ca.gov   | <b>Comment Letter A1</b> |  |
| Making Conservation<br>a California Way of Life  |                          |   |
| December 5, 2023   |                          |   |
| Carey Upton, Chief Operations Officer<br>Santa Monica-Malibu Unified School District<br>1717 4 <sup>th</sup> Street<br>Santa Monica, CA 90401  |                          |   |
| RE: Grant Elementary School Campus<br>Master Plan Project (DEIR)<br>SCH #2023010229<br>GTS #07-LA-2023-04359<br>Vic. LA-10/PM 3.61   |                          |   |
| Dear Carey Upton,  |                          |   |
| Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Santa Monica-Malibu Unified School District proposes renovating and modernizing the existing Grant Elementary School campus. Redevelopment would include the demolition and removal of some existing structures, renovation of structures to remain, construction of two new buildings, new and reconfigured playgrounds, and two new and reconfigured parking lots. The plan will be constructed in three phases on the District-owned campus.           |                          |   |
| As of now, a visitor and administrative parking lot with 14 parking stalls occupies the northeast corner of campus facing Pearl Street. An L-shaped staff parking lot with 48 parking stalls is at the southeast corner of the campus adjacent to the basketball courts and is accessed from 24th Street. Students who walk or bike to school enter the campus at the northern end. Current student drop-off/pick-up (DOPU) operations occur at two locations:   |                          |   |
| <ul style="list-style-type: none"><li>• Pearl Street. The Pearl Street DOPU area is limited to preschool and TK-K students. Vehicles queue on the south (eastbound) side of Pearl Street between Cloverfield Boulevard and 24th Court during DOPU hours.</li><li>• 24th Street. The 24th Street DOPU is utilized by grades 1 through 5 students and is accessed primarily via Ocean Park Boulevard. The two-lane collector street ends at the gated entrance into the southern portion of the campus. On-street parking is allowed on either side of 24th Street. Vehicles enter the campus driveway and</li></ul> |                          |   |
| *Provide a safe and reliable transportation network that serves all people and respects the environment*   |                          |   |

A1-1

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follow the counterclockwise vehicular pattern in the existing staff parking lot and exit back onto 24th Street.

Phase 2 of the Proposed Project would include the removal of the L-shaped surface parking lot in the southeast portion of the campus fronting 24th Court, 24th Street, and residences. The existing L-shaped playfield would be reconfigured to a standard rectangular playfield and centrally located in the southern portion of the campus. Development of two new parking lots would occur at the southeast and southwest corners of the campus along 24th Court and Pearl Place. Each parking lot would contain 40 parking spaces, and the lots would be separated by the improved playfield. The Project would maintain the drop-off and pick-up area at the front of the campus along Pearl Street and include a new arrival court at the southern end of the campus, adjacent to the reconfigured playfield, that would connect the two new parking lots to 24th Street.

A1-1  
Cont'd

After reviewing the DEIR, Caltrans has the following comments:

The Project is designed in a way that would lead to an overall net increase in parking from 62 spaces to 94 spaces, with the Project's addition of 32 new parking spaces to potentially address queuing and/or on-street parking on 24th Street. However, Caltrans recommends adopting the proposed improvements developed in response to the City's Safe Routes to School (SRTS) Walk Audit Recommendations for Grant ES, which are listed in Section 5.10 of the DEIR:

- Pearl Street from 23rd to 25th Street: Add enhanced markings to improve visibility of bicycle lane.
- Pearl Street and 24th Street: Evaluate feasibility of curb extensions.
- Pearl Street and 24th Court: Reconstruct sidewalk and apron across 24th Court.
- 24th Street and Ocean Park Place North: Reconstruct sidewalk and apron across Ocean Park Place North.
- Ocean Park Boulevard and 24th Street: Evaluate feasibility of curb extensions, upgrade ramps.
- Pearl Street adjacent to school: Evaluate drop-off and pick-up zones to reduce conflict points.

A1-2

Caltrans highly encourages adoption of discussed improvements in Table 5.10-1 to facilitate the provision of non-motorized travel options including:

- Installing skateboard and scooter racks for students who currently do not have a place to safely lock them.
- Upgrading all curb ramps, specifically the ramp on Pearl Street, without detectable warning surfaces to meet ADA requirements.
- Re-evaluating transition of bike lane on Pearl Street to sparrow condition and modify as appropriate. Upgrading potential bikeways to Class IV when possible

A1-3

*"Provide a safe and reliable transportation network that serves all people and respects the environment"*

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- and unlocking alternative access paths to the school property to prevent vehicle entry and exit from conflicting with bicycle and pedestrian access.
- Reconstructing sidewalks and restriping crosswalks to provide visible, safe, and continuous pathways for pedestrians.
- Installing signage where necessary to reduce vehicle speeding in the school zone on Pearl Street.

A1-3  
Cont'd

In Caltrans' previous comment for the NOP, it was noted that the Project proposed a new off-street lane for drop-off/pick-up which would be constructed adjacent to Pearl Street in front of the campus. The off-street lane would have impacted the safety conditions for interactions between bicyclists commuting from Santa Monica College, drivers, and students during peak arrival and drop-off hours in the morning and afternoon. Upon review of the DEIR, we would like to confirm that the proposed off-street lane has been removed from the project's scope. To support a community's ability to choose active modes of transportation, the plan should consider safety and accessibility options for all impacted by vehicular traffic caused during school hours. Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking and public transit, and a 15% reduction in statewide VMT can be achieved through collaborative improvements to the state-wide transportation network.

A1-4

Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. It is recommended that large size truck trips be limited to off-peak commute periods.

A1-5

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS #07-LA-2023-04359.

A1-6

Sincerely,

*Frances Duong*

Frances Duong  
Acting LDR/CEQA Branch Chief

email: State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people and respects the environment"*

## 2. Responses to Comments

### A1. Response to Comments from Frances Duong, California Department of Transportation, provided via email on December 5, 2023

A1-1 This comment contains introductory information and a summary description of the Proposed Project as contained in the DEIR. The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

A1-2 This comment states that the design of the Proposed Project could lead to an overall net increase of 32 parking spaces at Grant ES and recommends adopting the proposed improvements described in Section 5.10, *Transportation*, of the DEIR that were developed as part of the City of Santa Monica's Safe Routes to School (SRTS) Walk Audit Recommendations for Grant ES.

It should be noted that following public comments, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, Revisions to the DEIR), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24th Court, thereby reducing the number of proposed parking spaces. The area would serve as a pedestrian plaza for student access. This would result in an overall increase in parking of 18 spaces (compared to the 62 that are existing). The reduction in parking would not change the environmental impact analysis contained in the DEIR as the parking demand factors (i.e., school capacity and staffing) would not change.

Proposed SRTS improvements that are described on Page 5.10-6 of the DEIR are being undertaken separately by the City of Santa Monica, and are not in the jurisdiction of the SMMUSD. They involve sidewalk improvements, curb extensions, and pedestrian markings that are within the public right-of-way of the City of Santa Monica, and outside of SMMUSD property. While the District is in support of these improvements and in close coordination with the City, the District does not have the authority or responsibility to advance these projects that would be undertaken by the City.

Although the surrounding sidewalks/streets are outside of the District's jurisdiction (within the jurisdiction of the City of Santa Monica) the Proposed Project would not conflict with the goals and objectives the City's SRTS program, and the ability of these improvements to proceed as planned by the City. As described on page 5.10-16 of the DEIR, implementation of the Proposed Project includes numerous improvements to vehicular and pedestrian safety access points that meet the intent of SRTS strategies identified in the Southern California Association of Government's (SCAG's) Active Transportation Technical Report:

- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.

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- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

These proposed improvements would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the “Street Design/Engineering Strategies” section of the 2021 Safe Routes Partnership Guidelines.

Additionally, in response to comments received during the public review period, the District may implement the design option, to repurpose the existing visitor and administrative parking into a community plaza, reducing overall parking on the campus from 94 to 80 parking spaces.

Therefore, implementation of above-referenced features would meet the intent of the City’s SRTS program and reduce impacts to pedestrians and bicyclists that would result from the proposed Project. The DEIR adequately analyzes all pedestrian impacts of the Proposed Project. The proposed design option referenced above does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

A1-3 The commenter encourages the adoption of improvements discussed in Table 5.10-1, *Walk Audit Recommendations for Grant ES*, to facilitate the provision of non-motorized travel options. As discussed in comment A1-2, proposed improvements that are described on Page 5.10-6 of the DEIR are being undertaken by the City of Santa Monica, and are not in the jurisdiction of the SMMUSD. However, the Proposed Project would not conflict with the goals and objectives the City’s SRTS program, and would implement improvements to vehicular and pedestrian safety access points that meet the intent of SRTS strategies identified in SCAG’s Active Transportation Technical Report.

Therefore, the DEIR adequately analyzes all pedestrian impacts of the Proposed Project, and no revisions are necessary.

A1-4 This comment references a previous comment provided by Caltrans on February 3, 2023, for the Proposed Project’s Notice of Preparation (NOP), which contended that the proposed new off-street lane for drop-off/pick-up along Pearl Street at the front of the campus would have impacted the safety conditions for interactions between bicyclists commuting from Santa Monica College, drivers, and students during peak arrival and

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drop-off hours in the morning and afternoon. During preparation of the DEIR and further refinement of the Proposed Project's details, the above-referenced drop-off/pick-up lane mentioned in the NOP has been removed from the Proposed Project.

The commenter also states that the Proposed Project should consider safety and accessibility options for pedestrians and bicyclists impacted by the vehicular traffic during school hours. As stated in comment A1-3, the Proposed Project would include improvements that are compatible with SRTS objectives and would serve to further reduce conflicts, improve safety, and enhance micro-mobility use.

The DEIR adequately analyzes all pedestrian impacts of the Proposed Project, and no revisions are necessary. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

- A1-5 This comment states that any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. It is recommended that large size truck trips be limited to off-peak commute periods.

As stated on page 5.10-18 of the DEIR, during construction of the Proposed Project, implementation of Mitigation Measure T-1 would require the construction contractor to prepare and implement a Construction Management Plan that will include a Temporary Traffic Control Plan (TTCP) to address anticipated impacts to or closures of public rights-of-way, demonstrate appropriate traffic handling during construction activities for all work that could impact the traveling public (e.g., the transport of equipment and materials to the campus area), and minimize hazards through industry-accepted traffic control practices. The first bullet item in Mitigation Measure T-1 requires the District to obtain transportation permits necessary for oversize and overweight load haul routes and follow regulations of the applicable jurisdiction for transportation of oversized and overweight loads. Therefore, this comment is adequately addressed in the DEIR and no revisions are necessary.

Additionally, the District would request an After-Hours Work permit to allow for construction outside of the allowed hours identified in the SMMC (from 8:00 am to 6:00 pm on weekdays) to allow Proposed Project construction to begin at 7:00 a.m. The earlier arrival of construction workers would allow them to be in the work area prior to student arrival/drop-off, thereby improving pedestrian safety and reducing traffic congestion during construction activities.

Therefore, implementation of above-reference mitigation measure would reduce impacts from construction vehicles that would result from the Proposed Project. The DEIR adequately analyzes construction transportation impacts of the Proposed Project, and no revisions are necessary.

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- A1-6 This comment provides general contact information. The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

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## 2. Responses to Comments

### Comment A2. Tamara Purvis, Department of Toxic Substance Control

## Comment Letter A2



**Yana Garcia**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

### SENT VIA ELECTRONIC MAIL

December 12, 2023

Carey Upton  
Chief Operations Officer  
Santa Monica-Malibu Unified School District  
1717 4<sup>th</sup> Street  
Santa Monica, CA 90401  
[Cupton@smmusd.org](mailto:Cupton@smmusd.org)

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE GRANT  
ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT, DATED OCTOBER 30,  
2023 STATE CLEARINGHOUSE # [2023010229](#)

Dear Carey Upton

The Department of Toxic Substances Control (DTSC) received a DEIR for the Grant Elementary School Campus Master Plan Project. The Proposed Project, which involves implementation of a Campus Master Plan, would be constructed in three phases on approximately 5.41 acres of the 6.01-acre campus. Redevelopment and modernization of Grant ES includes the demolition and removal of some existing structures, renovation of three remaining structures, construction of two new buildings, new and reconfigured playfields and playgrounds, and two new and reconfigured parking lots. Ten existing modular and relocatable classroom buildings (P70 through P79), one modular building (playground restrooms), shade structures, and a portion of one permanent classroom building (Building B) would be selectively demolished and removed as part of the Proposed Project, for a total of 76,415 square feet of demolition. The remaining

A2-1

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buildings would remain as is. The Proposed Project would include renovation and expansion of the existing library (Building F), which would be combined with Building G to create a new Library and Maker space; interior renovation of the transitional kindergarten and kindergarten classrooms (Building A); and improvements to the Central Garden. The Proposed Project would include the construction of two new classroom buildings to replace the 10 portable classrooms that would be removed. Improvements to outdoor recreational areas and relocation and reconfiguration of the parking lot would also be implemented.

A2-1  
Cont'd

DTSC has identified that the Project's DEIR includes a Phase I Environmental Assessment (Phase I) in Appendix I. The Phase I was submitted separately to DTSC for review on September 27, 2022. DTSC issued a determination letter on the Phase I on December 19, 2022. The letter and additional information on [Grant Elementary School Site](#) can be found on EnviroStor. DTSC determined that a completion of Preliminary Environmental Assessment (PEA) is needed for the Site to address, but may not be limited to, the Recognized Environmental Conditions identified in the Phase I.

A2-2

DTSC requests consideration of the following comments.

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§ 17210](#), [§ 17213.1](#), and [§ 17213.2](#), unless otherwise specifically exempted under section [§ 17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§ 17268](#), DTSC recommends the district continue to investigate and clean up the Site, if necessary, under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents. For more information on the CDE State funding, please visit [Office of Public School Construction](#) webpage.

A2-3

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A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

A2-3  
Cont'd

2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#)

A2-4

3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material meets screening levels for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use.

A2-5

DTSC appreciates the opportunity to comment on the Grant Elementary School Campus Master Plan Project's DEIR. If you would like to proceed with DTSC's school

A2-6

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environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process](#) to begin a Phase I Environmental Site Assessment.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

A2-6  
Cont'd

Sincerely,

*Tamara Purvis*

Tamara Purvis  
Associate Environmental Planner  
HWMP – Permitting Division - CEQA Unit  
Department of Toxic Substances Control  
[Tamara.purvis@dtsc.ca.gov](mailto:Tamara.purvis@dtsc.ca.gov)

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## 2. Responses to Comments

### A2. Response to Comments from Tamara Purvis, Department of Toxic Substance Control, provided via email on December 12, 2023.

A2-1 This comment contains introductory information and a summary description of the proposed Project. The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

A2-2 This comment acknowledges that DTSC has reviewed the Phase I Environmental Site Assessment (ESA) that is included as Appendix I to the DEIR, and have determined that a Preliminary Environmental Assessment (PEA) is needed to address identified Recognized Environmental Conditions (RECs). In response to DTSC's December 19, 2022 letter regarding the review of the Phase I Environmental Site Assessment (ESA), NV5 responded on behalf of the District on January 16, 2023, and stated that SMMUSD would not be requesting further DTSC review or oversight for the Proposed Project. However, the District would adhere to DTSC's policies and guidelines concerning the identification and quantification of contaminants within the ground and any remediation needed, as determined to DTSC's health risk assessment practices.

As stated on page 5.7-11 of the DEIR, a Phase I ESA for Grant Elementary School was prepared in April 2022. No evidence of RECs were identified during the assessment.

Therefore, the DEIR adequately analyzes all hazardous materials impacts of the Proposed Project, and no revisions are necessary. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

A2-3 This comment states that the District should comply with the requirements of the Education Code if funding from the California Department of Education (CDE) will be required for the Proposed Project.

The Proposed Project does not require State funding and is therefore exempt from the requirements of the Education Code sections 17210, 17213.1 and 17213.2. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. All materials would be handled, transported, used, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Compliance with these regulations would reduce the potential for hazardous materials to be released to the environment during construction. Additionally, the District has a School Safety Plan that outlines procedures to address evacuation, clean up, and communication protocols to protect students and staff in the event of a hazardous materials spill (SMMUSD 2018), and Grant ES provides Safety Guidelines and Emergency Information to prepare staff, caregivers, and students in case of an emergency.

## 2. Responses to Comments

Therefore, the DEIR adequately analyzes all hazardous materials impacts of the Proposed Project, and no revisions are necessary.

- A2-4 The comment states that if buildings or other structures are to be demolished, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk.

As stated on page 5.7-14 of the DEIR, demolition, remediation, and renovation of existing buildings and earth-moving activities at the campus could result in the release of hazardous building materials and soil contaminants such as asbestos-containing material (ACMs), lead-based paint (LBP), and polychlorinated biphenyl (PCBs). Mitigation Measure HAZ-1 requires that any existing buildings proposed for demolition or renovation be inspected by a qualified environmental specialist for the presence of hazardous building materials, including ACM, LBP, and PCB, prior to demolition or renovation activities. If hazardous building materials are detected, abatement and removal of these materials will be conducted in accordance with applicable federal, state, and local regulations, policies, and guidelines, including DTSC's 2006 Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers.

Mitigation Measures HAZ-1 and HAZ-2 would ensure proper handling of hazardous building materials (e.g., ACMs and LBPs) and potentially contaminated soils during construction to ensure the safety of humans and the environment.

Therefore, the DEIR adequately analyzes all hazardous materials impacts of the Proposed Project, and no revisions are necessary.

- A2-5 The comment states that DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use.

As stated on page 3-37 of the DEIR, no imported soils would be necessary for the Proposed Project. Additionally, Mitigation Measure HAZ-2 requires the District to retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer to conduct soil sampling prior to any disturbance of the areas suspected of potential contamination. If the soil sampling identifies the presence of contaminated soils, the contractor shall prepare and implement a contaminated soils removal action workplan for removal of affected soils on-site. Treatment of contaminated soils shall be conducted in a manner consistent with recommendations in the removal action work plan and the campus shall be cleaned to an acceptable level per DTSC requirements. The District has included a minor revision to the mitigation, as show in Chapter 3, *Revisions to the DEIR*, of this FEIR, to allow for flexibility of remedial action consistent with the recommendations of the removal action workplan.

## 2. Responses to Comments

The minor modification to Section 5.7, *Hazards and Hazardous Materials*, regarding the consistency with the removal action work plan if contaminated soils are identified, does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

A2-6 This comment states appreciation from the DTSC to the District for the notice provided regarding the Proposed Project, and the District's assistance in protecting California's people and environment from the harmful effects of toxic substances.

The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact. However, the statement is acknowledged for the record. The SMMUSD Board of Education will consider all comments prior to the finalization of this Proposed Project.

## 2. Responses to Comments

### Comment O1. Boris Suchkov, Santa Monica Families for Safe Streets

|  |                          |
|--|--------------------------|
|  <p>Santa Monica Families for<br/><b>Safe Streets</b></p>   | <b>Comment Letter O1</b> |
| <b>Grant Master Plan Draft EIR Comments</b>  |                          |
| <p>Carey Upton, Chief Operations Officer<br/>Santa Monica-Malibu Unified School District<br/>1717 4th St<br/>Santa Monica, CA 90401</p>  |                          |
| <p>Draft EIR Comments Regarding Grant Elementary School Campus Master Plan Project (SCH #2023010229)</p>   |                          |
| <p>From Boris Suchkov and <a href="#">Santa Monica Families for Safe Streets</a>.</p>  |                          |
| <p>December 12, 2023</p>   |                          |
| <p><b>Santa Monica Families for Safe Streets</b> is pleased to make the following comments regarding possibly inaccurate statements, environmental impacts and mitigations for the Grant Elementary School Campus Master Plan Project (Draft EIR) related to transportation, and to work with the project team on further identification of improvements.</p>  | O1-1                     |
| <h3>Summary</h3>   |                          |
| <p>The School District, in our analysis, has NOT made a good faith effort at full disclosure of transportation impacts for the proposed project. Due to the errors and incorrect assumptions in this EIR, there is also a fair argument that the Grant Elementary EIR/Master Plan is NOT consistent with the applicable Sustainable Communities Strategy/Regional Transportation Plan. Changes to the EIR/Master Plan documents, a VMT analysis, or mitigation measures in lieu of the VMT analysis are requested as a result.</p> | O1-2                     |
| <p>Our EIR Scoping comments submitted in February 2023 have not been addressed. Our comments below clarify and build upon our Scoping comments.</p>  | O1-3                     |
| <p>Santa Monica Families for Safe Streets requests that mitigation measures are added to the EIR that include an expanded drop-off/pick-up zone for those not using automobiles; no net increase in parking spaces; and the removal of the “arrival court” from plans.</p>   | O1-4                     |
| <h3>Need to Conduct VMT Analysis/Consistency with Applicable Plans</h3>  |                          |
| <p>Vehicle Miles Traveled Increase</p>   |                          |
| <p>The Proposed Project would increase parking supply on campus by 50% and add a new primary access location where there is currently none (24th St entrance) by building an “arrival court.” Making these enhanced facilities available to motorists will induce new vehicle trips (causing an increase in Vehicle Miles Traveled) as staff members and parents who may have carpooled, walked, biked, etc start driving to/from school instead.</p>  | O1-5                     |
| <p>1</p>   |                          |

## 2. Responses to Comments



### Grant Master Plan Draft EIR Comments

#### Expanded Student Capacity

The Proposed Project would also expand student capacity of the campus by enlarging it by 12 classrooms and set the stage for a potential enrollment increase as the city grows in population over the next 10-15 years due to the state-mandated Housing Element development and/or potential other redevelopment within Grant Elementary's enrollment zone.

O1-6

#### Inconsistency with RTP/SCS

The SCAG RTP/SCS Environmental Impact Report's air quality, transportation, and greenhouse gas determinations rely in part on off-model analysis that assumes Safe Routes to School safety enhancements. The Grant EIR mentions potential Safe Routes to Schools projects that the City of Santa Monica may or may not implement in the next few years. However, there is no logical nexus between City intentions and the Master Plan as the EIR does not propose to fund or construct any significant Safe Routes to School improvements.

O1-7

Given that the Proposed Project increases student capacity (and potentially enrollment), and does not include implementation of projects that meaningfully improve pedestrian and bicycle safety, connectivity, or circulation near and in the school campus, there is a fair argument that the Grant Master Plan is NOT consistent with the SCAG RTP/SCS.

O1-8

#### Exception to the Presumption of Less Than Significant Impact

Given that the Proposed Project is not consistent with the SCAG RTP/SCS, and also will generate significant new levels of VMT, according to the [CEQA Technical Advisory](#) it is NOT appropriate to presume Less Than Significant Impact, even though Grant is located in a high quality transit area. Therefore, a detailed VMT Analysis should be conducted.

O1-9

#### Required Additional Study

Given that (1) there is no provable demand for additional staff parking; (2) 24th St drop-offs/pickups are minimal; (3) there is community opposition to more traffic on 24th St; (4) the Proposed Project is inconsistent with the applicable Sustainable Communities Strategy and cannot presume a less-than-significant impact on VMT; and that (5) the Proposed Project fails to include (a) mitigation measures for the expected VMT increase and (b) significant Safe Routes to School project components, we request that a detailed VMT Analysis is done showing impacts from the new vehicle trips generated as parents/caregivers start using the new "arrival court".

O1-10

#### Requested Mitigation Measures in Lieu of Required Additional Study

To reduce VMT impacts from the project below a threshold of significance and avoid the need for a VMT analysis, we request that mitigation measures are added to the Proposed Project as follows:

O1-11

## 2. Responses to Comments



### Grant Master Plan Draft EIR Comments

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. This is critical, given the proposal to increase automobile volume through increased parking.
  - a. Cargo and/or electric bicycles, which are much larger than regular bicycles, are often used to transport children to/from Grant ES. Given that up to 93-94% of students are transported via mode other than automobile (as per SMMUSD Grant Bike It! Walk It! coordinator) there is a severe need for safe, dedicated space for bike drop-offs and pick-ups.
  - b. The grassy area in front of Building A is currently used informally for bike drop-offs and pick-ups. When this area is redeveloped into an expansion of the outdoor play area in Phase I of the Proposed Project, conditions for parents dropping off/picking up children by bike will deteriorate further.
  - c. Accommodating bike DOPU can be done most directly by converting the north (Pearl St) parking lot to a more sustainable multipurpose open area combining an enlarged plaza for accommodating cargo bike/micromobility DOPU, loading/emergency vehicle access, and a garden with a sitting area;
2. Any net additional south (24th St) parking lot spaces are limited to 14 maximum (offsetting the conversion of the north lot and maintaining net zero parking spaces campus-wide);
3. The "arrival court" is removed from the Master Plan and south lot access remains limited to staff/visitors, as it is today;
4. Any reconfiguration of the south lot maintains the pedestrian improvement elements specified in the EIR;
5. In coordination with the City of Santa Monica, Safe Routes to Schools elements are implemented within 1,000 ft of the school campus, including improved striping on Pearl St to safely guide micromobility traffic to the new non-car DOPU area;
6. Consistent with Caltrans recommendations, a Transportation Demand Management program is implemented with quantifiable incentives for school staff to take modes other than Single Occupancy Vehicles to/from work.

O1-12

O1-13

O1-14

O1-15

O1-16

O1-17

### Details in Support of Mitigation Measures and EIR Corrections

Rewrite Appendix K to Remove Factually Inaccurate, Unverifiable, and Conflicting Statements, and Provide an Accurate Mode Share Survey and Analysis Based on Correct Information.

O1-18

The basic factual errors present in Appendix K put both the motives and the conclusions of the EIR's entire transportation analysis into question.

- a. Appendix K makes a number of possibly false and/or contradictory statements regarding student and vehicle circulation at Grant Elementary. The consultant (IBI) claims to have

O1-19

## 2. Responses to Comments



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visited the campus on May 3, 2022 to observe drop off/pick up operations. However, they make a number of easily verifiable errors or misstatements:

O1-19  
Cont'd

- i. "The majority of students are dropped off by a vehicle" (p. K-2).

**This has no basis in fact and is provided with no evidence.** The consultant provides no study, survey, or other evidence of this, and yet any rational observer can see that most student drop-offs are NOT by a vehicle. This is backed up by Bike It! Walk It! (BIWI) data. (In fact, BIWI is mentioned in the very next paragraph after the unverifiable claim). Routinely, during BIWI days the school shows a non-car drop-off rate in the high 80%/low 90%. While a normal (not BIWI day) has somewhat lower non-car numbers, the majority of students still arrive at the school entrances by a mode other than car drop off.

O1-20

- ii. "The Pearl Street DOPU area is limited to TK, Pre-Kindergarten, and Kindergarten students." (p. K-2).

**This is either false, or the consultant is just confused as to how drop off/pick up works at Pearl St.** The vast majority of drop-offs (all grades) occur at the main entrance on Pearl St (gates near the auditorium). Parents may walk TK and Pre-K students directly to classrooms. Kids in other grades walk themselves once they're inside the main gates. *Pick-ups only* occur at the side gate leading to the Kindergarten play yard facing Pearl St, and serve only Kindergarten students. The consultant may have confused this side gate with the Pearl St main gate.

O1-21

- iii. "The 24th Street DOPU at the southern end of the Campus is utilized by Grades 1 through 5 students... Vehicles were observed to enter the Campus' driveway and follow the counterclockwise circular vehicular pattern within the existing staff parking lot" (p. K-2).

**Again, it's not accurate to assume this entrance is only open to grades 1-5.** This school entrance is open to all grades. *At dismissal, grade 4 and 5 students only* may leave through this gate, because they are allowed to leave school on their own without a parent/caretaker.

O1-22

Also, private vehicles dropping off students are not allowed inside the staff parking lot. **If the consultant indeed observed DOPU inside the staff parking lot, the drop-offs violate existing standard operating procedure established by the school administration several years ago to improve safety on campus.** DOPU here is only allowed at the dead-end street turnaround itself.

O1-23

## 2. Responses to Comments



### Grant Master Plan Draft EIR Comments

- iv. "The arrival court would provide a safer DOPU area for students that are dropped off or picked up at the southern end of the Campus" (p. K-14).

**This is an assumption provided with no analysis or evidence. Very likely, the opposite will happen.** The proposed arrival court will incentivize more DOPU to occur by car, which means more students will be put in harm's way because of the need to be adjacent to vehicles during DOPU. Even if each individual student will feel safer by not having to cross vehicular circulation, by increasing the sum total of trips, cumulative danger to all students (and other street users in the area of the school) will increase.

O1-24

- v. "Provision of the arrival court and the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24th Street by providing additional space for vehicles to enter through the new parking lots on either side of the Campus and exit back onto 24th Street" (p. K-14).

**By "improving" vehicle access (e.g. providing it where currently there is none, within the parking area) will induce more driving; the number of vehicle trips will increase, causing more congestion on 24th St and adjacent streets; increasing GHG pollution; and increasing VMT.**

O1-25

- vi. "All vehicles entering via 24th Street for DOPU operations can be accommodated on-site within the arrival court, eliminating queuing and/or on-street parking on 24th Street" (p. K-14).

**To claim that the arrival court will accommodate "on-street parking" is inaccurate.** Yes, some parents/caregivers arrive early and park on the street while waiting for dismissal. But they would not be allowed to park in the school staff parking lot, in any scenario. And presumably they would not be allowed to park in the arrival court, because the arrival court is for DOPU operations only. Due to the ban on student DOPU in the 24th St staff parking lot mentioned above, the number of cars doing DOPU on 24th St is minimal. **Expanding access by enlarging the parking lot and adding an arrival court would significantly increase congestion, VMT, and GHG emissions on 24th St and be a serious nuisance to those living in 24th St.**

O1-26

Address Caltrans and Community Requests in Regards to No Net Parking Increase, TDM Program, and Safe Routes to Schools Improvements.

There is no demonstrable effort to address existing community concerns and previous recommendations from various organizations, including Caltrans.

O1-27

## 2. Responses to Comments



### Grant Master Plan Draft EIR Comments

- a. A written comment previously submitted (during the Grant EIR scoping public comment period) by Santa Monica Families for Safe Streets in regards to RTP consistency is not present in Appendix C. The argument made there is revised and presented again, in the next section below.
- b. Another EIR scoping comment was submitted by Caltrans. It is included in the Draft EIR's Appendix C. It presents three recommendations:
  - i. Reduce the amount of car parking supplied.
  - ii. "Improve connections from schools to existing active transportation and transit infrastructure." Although not naming Safe Routes to School, the safety strategies specified are consistent with Safe Routes to School.
  - iii. "Implement TDM strategies to reduce school traffic congestion at peak periods as alternatives to requiring car drop-off and pick-up."

O1-28

Additionally, the comment states "Caltrans looks forward to reviewing the forthcoming Draft Program Environmental Impact Report (PEIR) to confirm that there will be measures to prevent an increase in overall parking spaces to ensure that VMT impact is not generated via demand."

O1-29

It appears that the Caltrans recommendations are essentially ignored in the EIR. While total campus parking proposed is reduced from 100 at scoping to 94 in the EIR, the main point remains the same: there is an increase in parking supplied; it will induce demand; additional VMT will be generated.

- c. Other scoping comments submitted stress the need to avoid worsening traffic congestion along 24th St, and making zero carbon a goal. Adding the proposed parking and arrival court is contrary to those requests.

O1-30

#### Make EIR Consistent with Applicable Plans

As described above and in our February 2023 Scoping comment, the Grant Master Plan remains inconsistent with the SCAG RTP/SCS. As per CEQA Guidelines § 15064.3, subdivision (b), less than significant impact cannot be assumed because the EIR is inconsistent with the applicable Sustainable Communities Strategy. Therefore, a VMT study and/or mitigations may be required. The concerns presented in the Draft EIR are detailed below.

O1-31

- a. Section 5.10.3.2 claims consistency with the SCAG Regional Transportation Plan/Sustainable Communities Strategy. There are several issues with this claim:

- i. The EIR claims no "increase in student capacity" even though 12 (net) new classrooms are added through the Proposed Project, thus increasing student *capacity* (although not necessarily enrollment). The EIR itself makes the case

O1-32

## 2. Responses to Comments



### Grant Master Plan Draft EIR Comments

that capacity is increased by the provision of new classrooms.

"It would not result in an increase in student capacity or staffing levels in the school and would therefore not result in an increase of vehicle trips following Proposed Project buildout" (p. 5.10-13).

O1-32  
Cont'd

As stated in the letter to parents from Carey Upton (the "Notice of Availability of Environmental Impact Report"), the "Proposed Project would provide 21 new classrooms in two new buildings (net 12 new classrooms)." It's true that in the short run, despite the presence of 12 new classrooms, enrollment (which is subject to demographics and other factors) may not increase. **However, it is disingenuous to claim that student capacity won't increase by the provision of net 12 new classrooms. Certainly, adding 12 additional classrooms increases student capacity.** Yes, Grant can benefit from additional classrooms without increasing enrollment - limiting them to temporary, specialized uses such as music rooms, art rooms, science labs, etc. However, in the long run (for example, if the Santa Monica Airport is redeveloped with new housing, or the housing mandated by the state continues to be built), Grant enrollment may in fact increase, and the capacity provided by the 12 new classrooms will be used to absorb the increase.

O1-33

- ii. The EIR claims, without evidence, that the net increase in parking supply will not increase VMT because it addresses existing parking needs. The EIR further obfuscates the matter by conflating staff parking (of which there is no documentable unmet need) with short-term parent/caretaker parking done for DOPU purposes (which cannot be accommodated in the staff parking lot OR the arrival court by definition). In fact, an expanded parking lot and new arrival court will induce new demand, cause more traffic on 24th St, and increase VMT/GHG.

O1-34

"While the Proposed Project would result in a net increase in parking supply, this additional parking would alleviate existing issues related to on-street parking on Pearl Street and 24th Street and would not induce vehicle travel to the campus" (p. 5.10-13).

As detailed in the previous section on Appendix K, **there are NO existing issues related to on-street parking, because staff currently have sufficient parking, and the proposal is to increase staff parking capacity.** The net increase in parking supply WILL induce vehicle travel, because the new unused spaces (unused because existing supply matches existing demand) will attract staff members who don't currently drive, but may wish to do so. And even if there were staff members who park on the street that will start using the new lot, other motorists (school-related or not) would replace them, through the principle of

O1-35

## 2. Responses to Comments



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### Grant Master Plan Draft EIR Comments

induced demand, thus increasing driving trips.

O1-35  
 Cont'd

- iii. “Additionally, since the Proposed Project would operate in the same capacity as existing conditions, it would not conflict with the 2020-2045 RTP/SCS “core vision”” (p. 5.10-13).

Net 12 new classrooms that increase student capacity, an expanded parking lot, and an arrival court that creates a new access point where there is currently none (because DOPU is not currently allowed in the south lot) will generate new driving demand and cannot be considered as operating “in the same capacity as existing conditions.”

O1-36

- iv. The SCAG 2020 Regional Transportation Plan/Sustainable Communities Strategy Environmental Impact Report’s air quality, transportation, and greenhouse gas determinations rely in part on off-model analysis that assumes Safe Routes to School safety enhancements. The EIR mentions the City’s SRTS projects in passing, but does not link them to the Proposed Project in any way. As such, the project should fund implementation of quick-build (low-cost) of Safe Routes to School safety enhancements within the school zone (extending approximately 1,000 feet from school grounds). Failure to implement Safe Routes to School Safety Enhancements would create an inconsistency with an applicable programmatic EIR and require additional environmental review to assess the impacts of the absence of Safe Routes to School Safety Enhancements on SCAG’s off-model analysis for purposes of federally-mandated air quality conformity, state-mandated greenhouse gas targets, post-SB 743 transportation impacts, safety, and other possibly applicable environmental review criteria.

O1-37

In short, there is a fair argument that the Grant ES Master Plan is NOT consistent with the Regional Transportation Plan because:

- a. It proposes to increase parking capacity on campus (from 62 to 94 spaces) in an arbitrary manner unrelated to stated desired outcomes, and without providing mitigation measures;
- b. It claims no increase to student capacity despite the addition of net 12 new classrooms, creating an internal contradiction in the EIR itself; and
- c. It does not include implementation of Safe Routes to School projects or otherwise improve pedestrian and bicycle safety, connectivity, or circulation near and in the school campus; or, provide for a separate modeling study that evaluates these specific impacts.

O1-38

O1-39

O1-40

## 2. Responses to Comments

### O1. Response to Comments from Boris Suchkov, Santa Monica Families for Safe Streets, provided via email on December 12, 2023.

O1-1 The commenter, on behalf of Santa Monica Families for Safe Streets, states that they are pleased to provide comments on the DEIR regarding possibly inaccurate statements, environmental impacts, and mitigation for the Proposed Project related to transportation, and to work with the project team regarding further improvements. It should be noted that the District met with the Safe Routes to Schools on April 27, 2023, regarding the McKinley ES and Grant ES projects, and on October 24, 2023, regarding the Proposed Project at Grant ES specifically. Their comments have been considered in the preparation of the DEIR. This comment provides introductory information to their subsequent comments and neither identifies a specific deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

O1-2 The commenter summarizes that the District has not made a good faith effort to disclose the transportation impacts for the Proposed Project, and that the Proposed Project is inconsistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). They request changes to the DEIR, including additional VMT analysis or additional mitigation measures in lieu of the requested VMT analysis for the Proposed Project.

Regarding consistency with the RTP/SCS, as demonstrated in detail on page 5.10-13 of the DEIR, construction and operation of the Proposed Project would not prohibit or interfere with the RTP/SCS greenhouse gas (GHG) per-capita reduction targets of 8 percent by 2020 and 19 percent by 2035, or the associated reduction in VMT per capita for year 2045 by 4.1 percent compared to baseline conditions. SCAG's goal is that the RTP/SCS be used by land use planning jurisdictions, such as cities and counties, for prioritizing transportation projects, encouraging behavior change, and furthering regional strategies that can shape Southern California's transportation and land use development for years to come (SCAG 2020). School districts, including SMMUSD, were not engaged in development of the RTP/SCS.

The RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS, but provides incentives for consistency to local governments and developers. The District consulted with SCAG regarding a similar project in response to comments provided by this same commenter in May 2023 (the McKinley ES project, approved by SMMUSD in June 2022) regarding the need for project consistency with the RTP/SCS. For the purpose of determining consistency with CEQA, it is SCAG's opinion that lead agencies, such as local jurisdictions, have the sole discretion in determining a project's consistency with the RTP/SCS. SCAG explained that it does not comment on projects that are not of regional significance, as defined by CEQA section 15206. According to SCAG, existing school campus modernization projects are

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not considered projects of regional significance. SCAG provided no comment letter on the proposed project during the scoping or DEIR public review periods, and there is no evidence that suggests the project is inconsistent with this regional planning document.

As demonstrated throughout the DEIR, the Proposed Project would operate in the same capacity as existing conditions with no change to student enrollment or staffing levels. The proposed project would not conflict with the 2020-2045 RTP/SCS “core vision” regarding maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together and increasing investments in transit and complete streets. Therefore, the Proposed Project would be consistent with the SCAG RTP/SCS, and the DEIR adequately analyzes all transportation impacts of the Proposed Project.

Regarding the commenter’s request for additional VMT analysis and mitigation measures, please see response to comments O1-5 and O1-11.

No revisions to the DEIR are necessary to respond to this comment. The DEIR appropriately assesses consistency with the RTP/SCS and provides a sufficient level of analysis and mitigation measures. The comment neither identifies a deficiency in the DEIR’s analysis nor a new potential or exacerbated significant environmental impact.

O1-3 The commenter states that their February 2023 scoping comments have not been addressed. Appendix C to the DEIR contains all comments received during the scoping period from January 13, 2023 to February 12, 2023. The District did not receive a comment letter from the commenter or Santa Monica Families for Safe Streets during the scoping period for the Grant ES Project, nor did the commenter attend the public scoping meeting at Grant ES held on February 7, 2023. Nevertheless, the District has met with this group on two occasions during preparation of the DEIR to understand their concerns, which were taken into consideration during preparation of the DEIR. The District also provided a detailed response to similar comments provided by the commenter on the McKinley ES FEIR, which are incorporated by reference into this response (June 2023). As detailed in the responses to this letter and in the DEIR, the District has adequately analyzed transportation impacts.

O1-4 The commenter summarizes their request that mitigation measures be added to the DEIR, including an expanded drop-off/pick-up zone for those not using automobiles, no net increase in parking spaces, and the removal of the arrival court from the Proposed Project.

As stated in the CEQA Guidelines Section 15041, lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the “nexus” and “rough proportionality” standards established by case law (*Nollan v. California Coastal Commission* (1987) 483 U.S. 825, *Dolan v. City of Tigard*, (1994) 512 U.S. 374, *Ehrlich v. City of Culver City*, (1996) 12 Cal.

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4th 854). CEQA Guidelines section 15126.4(3) states that mitigation measures are not required for effects which are not found to be significant.

While no significant transportation impacts were identified in the DEIR (as supported by substantial evidence), in response to comments received during the public review period of the DEIR, the District has included a design option in the Proposed Project's Description that would include removal of the existing 14-space administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove the 14 parking spaces from the existing parking lot during the Phase 3 of the Proposed Project, and redesign this area into a new community plaza for pick up and drop off, which would be accessible to pedestrians and bicyclists via 24<sup>th</sup> Court (see Figure 3-9, *Design Option, Pearl Street Community Plaza*, of the FEIR). This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions). Therefore, the commenter's request for an expanded drop-off/pick-up zone for pedestrians/bicyclists has been provided.

Regarding the request for no net increase in parking, the 62 existing parking spaces that are currently provided at Grant ES are not sufficient for current faculty, staff, and visitor needs. Santa Monica Municipal Code (SMMC) Section 9.28.060, *Off-Street Parking*, establishes off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, elementary schools located outside of one-half mile from a major transit stop should contain two parking spaces for each classroom. The nearest major transit stop is the 26<sup>th</sup> / Bergamot Station, 0.81 mile from the project site; therefore, two spaces per classroom is appropriate. There are currently 34 classrooms at Grant ES. Accordingly, the SMMC allows for a total of 68 parking spaces in current conditions (six less than what is allowed by code). Therefore, Grant ES is currently under-parked, resulting in the need for staff and visitors to circle local neighborhoods searching for limited street parking (increasing VMT). There is a demonstrated need for an increase in parking.

The majority of faculty and staff at Grant ES do not reside near the campus, and there are limited regional transportation options with direct access to Grant ES (as mentioned, the nearest regional transportation stop is 0.81 miles away). Additionally, given staff primarily reside outside of Santa Monica, walking and bicycling to work is largely infeasible. Currently, due to deficient on-campus parking, at times, staff are forced to park off campus in the surrounding neighborhood, which reduces the number of on-street parking available to, and burdens, nearby residents. Thus, commuting via automobile and the need for parking is necessary, and the deficiency of parking below SMMC requirements is already an existing condition.

Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms, and consistency with the parking requirements set forth in the SMMC would allow for 92 parking spaces. With the inclusion of the proposed design option in this FEIR, the

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Proposed Project would include 80 parking spaces, which is still well below SMMC allowed spaces. The reconfigured parking lots with additional spaces are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and drive time/miles searching for street parking). The increase in 18 parking spaces under the design option as presented in this FEIR would better serve the existing employees and visitors on campus. Implementation of the Proposed Project would not increase the student and staff population and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change. See response to comment O1-9 regarding the request for additional VMT analysis.

Regarding the request for removal of the arrival court, the arrival court would provide safe access to the campus for students who walk or bike to campus, and arrive from 24<sup>th</sup> Street, to avoid having to cross vehicular circulation within the new parking lots. The arrival court would not be used to for vehicular drop off/pick up. References to the arrival court in the DEIR have been revised to indicate that the arrival court is intended for pedestrians and bicyclists only, and no vehicles would be allowed, as show in Chapter 3, *Revisions to the DEIR*, of this FEIR.

The minor modification to Chapter 3, *Project Description*, and Section 5.10, *Transportation*, regarding the design option and proposed use of the arrival court, does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

- O1-5 The commenter states that the Proposed Project would result in an increase in VMT by adding a new access location on 24<sup>th</sup> Street and by providing a 50 percent increase in parking.

As discussed in detail in response to comment O1-4 above, the increase in parking would better serve the needs of the school and would not increase VMT. Regarding the commenter's claim that access from 24<sup>th</sup> Street is new, there is already a parking lot that is accessible from this location – this is part of the existing condition and would not affect VMT. The additional parking would merely shift the VMT parking in the neighborhood

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on the campus that in essence could shorten VMT from having staff drive around the neighborhood seeking available on-street parking spaces.

Additionally, the VMT analysis contained in the DEIR and Appendix K, *Access and Pedestrian Safety Analysis*, is consistent with the City of Santa Monica's process for analyzing the transportation impacts of land use and transportation projects, which in turn is consistent with State law set forth by the California Office of Planning and Research. The Proposed Project was reviewed against the City's VMT screening criteria system to determine if a VMT analysis would be required. Under Tier 1 of the City's VMT screening criteria, projects that required development of specific land uses are screened out from further analysis. The Proposed Project falls under Tier 1 of the City's screening criteria and is screened out from further VMT analysis.

As demonstrated on page K-8 of the DEIR (Appendix K), the Proposed Project is screened out from further VMT analysis under VMT Screening Criteria (d):

New construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increased, 75 percent of the student body comes from within 2.0 miles of the Campus.

As discussed throughout the DEIR, including on page 4-8 of the DEIR, the Proposed Project would not result in a change in student enrollment (see also response to comment O1-6). Additionally, though there is some variation year-to-year, roughly 90 percent of the student body is from within two miles of the Grant ES campus. Therefore, the DEIR adequately assesses potential VMT impacts and appropriately applies the City of Santa Monica VMT screening thresholds. No further VMT analysis or changes to the DEIR are warranted.

O1-6 The commenter claims that the Proposed Project would expand student capacity of the campus with the inclusion of new classrooms.

As demonstrated throughout the DEIR, the Proposed Project would not result in an increase in student enrollment. While there are 12 additional classrooms provided by the Proposed Project, these classrooms are serving the existing capacity of the school and are designed to better meet the goals of the Districtwide Educational Specifications, which shift the instructional design of the past—defined by a traditional teacher-at-the-front-of-the-classroom style of learning—to one that provides for rotational learning in the classroom, incorporating a variety of project-based learning experiences that allow simultaneous individualized, small group, and large group instruction, as described on page 3-1 of the DEIR. 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.

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Therefore, additional classroom space does not equate to increased capacity as the commenter claims.

As detailed on page 4-8 of the DEIR, Section 4.3.3.1, *Student Enrollment*, Grant ES has been experiencing steadily decreasing enrollment since 2013, from a high of 665 students to 550 in the 2022-2023 school year. The Grant ES student capacity is based on California Department of Education standards that assess the current capacity at a maximum enrollment of 915 students. This is a maximum where space is used as a classroom and is full of students. Based on the classroom maximums negotiated in the current collective bargaining agreement with the Santa Monica-Malibu Classroom Teachers Association, the maximum enrollment capacity at Grant ES is 809 students. However, neither of these maximum capacity numbers reflect current instruction practice or is anticipated based on actual enrollment trends. Based on the Districtwide Educational Specifications, the current campus could only support up to a maximum of 675 students.

The DEIR provides substantial evidence to support that the Proposed Project would not increase the campus capacity but would support the District's goals and objectives outlined in the Districtwide Education Specifications in the 2019 SMMUSD Education Master Plan (SMMUSD 2019). Therefore, no revisions to the DEIR are necessary.

O1-7 The commenter states that the DEIR is inconsistent with SCAG's RTP/SCS because it does not propose to fund or construct any significant Safe Routes to School improvements.

Proposed SRTS improvements that are being undertaken separately by the City of Santa Monica are not in the jurisdiction of the SMMUSD; nor is the Proposed Project dependent upon the City's SRTS improvements to be consistent with SCAG's RTP/SCS. The City, in coordination with the District as well as staff and caretakers, has identified additional priority SRTS projects in off-site locations under the jurisdiction of the City, as the planning lead agency. However, it is not within the authority of the District to implement off-site improvements that are not within its jurisdiction; nor is the District obligated to ensure that off-site projects, including the City's SRTS improvements, are implemented.

Although the surrounding sidewalks/streets are outside of the District's jurisdiction (within the jurisdiction of the City of Santa Monica), the Proposed Project would not conflict with the goals and objectives the City's SRTS program, and the ability of these improvements to proceed as planned. As described on page 5.10-16 of the DEIR, implementation of the Proposed Project includes numerous improvements to vehicular and pedestrian safety access points that meet the intent of SRTS strategies identified in the SCAG's Active Transportation Technical Report:

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- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

These proposed improvements would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the “Street Design/Engineering Strategies” section of the 2021 Safe Routes Partnership Guidelines.

Additionally, in response to comments received during the public review period, the District may implement the design option, to repurpose the existing visitor and administrative parking into a community plaza, reducing overall parking on the campus from 94 to 80 parking spaces.

Therefore, implementation of above-referenced features would meet the intent of the City’s SRTS program and reduce impacts to pedestrians and bicyclists that would result from the Proposed Project. The DEIR adequately analyzes all pedestrian impacts of the Proposed Project. The proposed design option referenced above does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O1-8 The commenter states that the Proposed Project is not consistent with SCAG’s RTP/SCS because it would increase student capacity and enrollment and does not include implementation of projects that meaningfully improve pedestrian and bicycle safety, connectivity, or circulation near and in the school campus. As discussed throughout the DEIR, the Proposed Project would not increase student capacity. The commenter has not provided any evidence to the contrary, other than the Proposed Project’s increase in classrooms. Please see comment response O1-6 and O1-7 above that address commenter’s claimed evidence.

O1-9 The commenter states that since the Proposed Project is not consistent with the SCAG RTP/SCS and would generate significant new levels of VMT, impacts to VMT should not be considered less than significant, and a VMT analysis should be conducted.

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As discussed in detail in response to comment O1-5 above, the Proposed Project falls under Tier 1 of the City's screening criteria and is therefore screened out from further VMT analysis.

- O1-10 This comment states that additional VMT analysis should be done showing impacts from the new vehicle trips generated by the Proposed Project. Please see comment responses O1-4 regarding the existing demonstrated demand for parking, O1-5 regarding existing access from 24<sup>th</sup> Street, O1-2 regarding consistency with the RTP/SCS, O1-4 regarding no nexus for additional mitigation measures, and O1-5 regarding O1-9 regarding appropriate application of the City's VMT screening criteria, above.
- O1-11 The commenter states that they are requesting additional mitigation measures for the Proposed Project to reduce VMT impacts and avoid the need for additional VMT analysis. This comment provided an introductory information to the subsequent requests for mitigation. See responses O1-12 through O1-17 below for specific information. Additionally, please see responses to comments O1-5 regarding O1-9 above, regarding appropriate application of the City's VMT screening criteria.
- O1-12 The comment states that the District should evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation.

As described in comment response O1-4, in response to comments received during the public review period of the DEIR, the District has included a design option in the Proposed Project's Description that would include removal of the administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove the 14 parking spaces from the existing parking lot during the Phase 3 of the Proposed Project consistent with the commenters request, and implement a new community plaza, which would be accessible to pedestrians and bicyclists via 24<sup>th</sup> Court (see Figure 3-9, Design Option, Pearl Street Community Plaza, of the FEIR). This additional non-automobile drop-off/pick-up area would offset any reduction in spaces associated with the expansion of student outdoor play areas in Phase 1.

This minor modification to Chapter 3, *Project Description*, does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

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O1-13 This comment states that any net additional parking spaces should be limited to 14 maximum (offsetting the conversion of the north lot and maintaining net zero parking spaces campus-wide).

As described in comment response O1-4, the reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces would better serve the existing employees and visitors on campus who presently primarily drive to campus, and would still be below SMMC parking ratios for the school use. The 62 existing parking spaces that are currently provided are not sufficient for current faculty, staff, and visitors at Grant ES. The majority of faculty and staff at Grant ES do not reside near the campus, and there is limited regional transportation with direct access to the site. Additionally, given staff locations, walking and bicycling to work is infeasible. Thus, commuting via automobile and the need for parking is necessary and already an existing conditions. However, implementation of the Proposed Project would not increase the student and staff population, and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change.

O1-14 This comment requests that the arrival court be removed from the Proposed Project and south lot access remains limited to staff/visitors.

As described in comment response O1-4, the arrival court would provide safe access to the campus for pedestrian and bicyclists only and would not be used to for vehicular drop off/pick up. References to the arrival court in the DEIR have been revised, as shown in Chapter 3, *Revisions to the DEIR*, of this FEIR.

The minor modification to Chapter 3, *Project Description*, and Section 5.10, *Transportation*, regarding the proposed use of the arrival court, does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O1-15 This comment requests that any reconfiguration of the south lot maintains the pedestrian improvement elements specified in the DEIR.

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As described on page 5.10-16 of the DEIR, implementation of the Proposed Project includes the following improvements to vehicular and pedestrian safety access points:

- An arrival court connecting the two new parking lots to 24th Street that would be accessible to pedestrians and bicyclists only.
- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

These proposed improvements would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the “Street Design/Engineering Strategies” section of the 2021 Safe Routes Partnership Guidelines.

O1-16 This comment states that the District should coordinate with the City to implement SRTS elements within 1,000 feet of the campus. Please see comment response O1-7.

O1-17 This comment states that, consistent with Caltrans recommendations, a transportation demand management (TDM) program should be implemented with quantifiable incentives for school staff to take modes other than Single Occupancy Vehicles to/from work.

As stated throughout the DEIR including on page 5.10-17, the Proposed Project would not increase the student or employment population at Grant ES, and the attendance boundaries of the school would not change. Therefore, the Proposed Project would not result in an increase in vehicle trips to and from the school when compared to existing conditions. Thus, a TDM would not be necessary for the Proposed Project.

Additionally, the District participates in programs such as the “Bike It Walk It” program as described on page 5.10-4, and has students enrolled in the Metro GoPass TAP card program for public transit, as described on page 5.10-16 of the DEIR, which encourage use of alternative methods of accessing the campus. These programs are in line with goals of a TDM program as requested by the commenter, and are adequately described in the DEIR. Additionally, Caltrans provided a comment letter in response to the DEIR (see comment letter A1 and responses to comments A1-1 through A1-6). Their comments, as the lead authority on transportation issues for state facilities, does not indicate the need for a TDM program.

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Therefore, the DEIR appropriately evaluates potential VMT impacts, and has determined that VMT impacts would be less than significant and therefore no mitigation measures are necessary. Therefore, no further changes to the DEIR are required.

O1-18 The commenter requests revisions to Appendix K regarding inaccurate information including summaries of field observations conducted by the transportation consultant in May 2022. Response to comments O1-19 through O1-26 provide specific responses to comments made regarding Appendix K. Revisions made in response to the comment are shown in Chapter 3, *Revisions to the DEIR*, of this FEIR.

O1-19 The commenter states that Appendix K includes possible false or contradictory statements regarding student and vehicle circulation and the observed drop off/pick up operations conducted by IBI at the Project Site.

The content of the report is based on field observations that were conducted on May 3, 2022, in which the majority of students observed entering the campus from Pearl Street were TK and Kindergarten students, and the majority of students entering the campus from 24th Street were students from grades 1-5. After further review, students from all grades enter and exit the campus from both Pearl Street and 24th Street. Therefore, the District has provided a minor modification to Appendix K regarding the drop off/pick up areas used by students and caregivers (see Section 3, *Revisions to the DEIR*).

The revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O1-20 The commenter states that the statement in Appendix K regarding the majority of students being dropped off by vehicle does not include evidence to support the claim.

The statement was made on the basis of the observations made on May 3, 2022. The statement acknowledges that students commute to school by other means. The statement has been modified to "...a significant portion of the students are dropped off by a vehicle...,"

The revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O1-21 The commenter states that the statement included in Appendix K regarding the Pearl Street drop off/pick up is limited to TK, Pre-Kindergarten, and Kindergarten students is

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false or was not correctly collected by traffic consultant. The commenter states that all grades utilize the Pearl Street drop off/pick up and there is a side gate along Pearl Street that only serves Kindergarten students.

This statement has been revised to indicate that TK, Pre-K and K DOPU are concentrated at Pearl Street but are not limited to these grades. Please see comment response O1-19.

The revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

- O1-22 The commenter states that the statement included in Appendix K regarding the 24<sup>th</sup> street drop off/pick up is limited to grades 1-5 is not accurate. The commenter states that only grades 4 and 5 can leave through the 24<sup>th</sup> street drop off/pick up.

The statement has been modified to state that this entrance is pre-dominantly used by Grades 1-5. Please see comment response O1-19.

The revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

- O1-23 The commenter claims that drop off/pick up is not allowed inside of the staff parking lot and that if students were dropped off/picked up in the staff parking lot it violates the schools standard operating procedures.

The content of the report is based on field observations that were conducted on May 3, 2022, in which vehicles were observed to enter the Campus' driveway and follow the counterclockwise circular vehicular pattern within the existing staff parking lot, exiting back onto 24th Street.

The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

- O1-24 The commenter states that the statement included in Appendix K regarding the arrival court providing a safer drop off/pick up area at the southern end of campus does not include analysis or evidence to support the claim.

As described in comment response O1-4, the arrival court would provide safe access to the campus for pedestrian and bicyclists only and would not be used to for vehicular drop

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off/pick up. References to the arrival court in the DEIR have been revised, as shown in Chapter 3, *Revisions to the DEIR*, of this FEIR.

The minor modification to Chapter 3, *Project Description*, and Section 5.10, *Transportation*, regarding the proposed use of the arrival court, does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O1-25 The commenter states that the statement included in Appendix K regarding the proposed arrival court and two proposed parking lots at the southern end of campus would increase driving and vehicle trips, therefore increasing congestion on 24<sup>th</sup> Street, GHG, and VMT. Please see responses to comments O1-5 regarding O1-9 above, regarding appropriate application of the City's VMT screening criteria.

O1-26 The commenter states that the statement included in Appendix K regarding vehicle entering 24<sup>th</sup> Street for drop off/pick up accommodating all vehicle and eliminating queuing on and/or on-street parking is inaccurate and would increase congestion, VMT, and GHG emissions. Please see responses to comments O1-5 regarding O1-9 above, regarding appropriate application of the City's VMT screening criteria.

O1-27 The commenter requests that the comments provided by Caltrans and Community requests are addressed in regard to No Net Parking Increase, TDM Program, and Safe Routes to School Improvements.

The commenter is referring to a letter provided by Caltrans during the scoping period for the DEIR, which is provided in Appendix A to the DEIR, and was considered during preparation of the DEIR. Information regarding parking, the District's involvement in VMT-reducing efforts (such as but not limited to the Bike It! Walk It! Annual event, transit passes for students, and bike storage), and details regarding the Safe Routes to School are found in Section 5.10, *Transportation*. Caltrans also provided a comment letter in response to the DEIR (Letter A1), which does not suggest that there would be significant impacts regarding VMT.

As described in comment response A1-2, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, *Revisions to the DEIR*), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24<sup>th</sup> Court, thereby reducing the number of proposed parking spaces. The area would serve as a pedestrian plaza for student access. This would result in an overall increase in parking of 18 spaces (compared to the 62 that are existing). The reduction in parking would not change the environmental impact analysis contained

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in the DEIR as the parking demand factors (i.e., school capacity and staffing) would not change.

The City, in coordination with the District as well as staff and caretakers, has identified additional priority SRTS projects in off-site locations under the jurisdiction of the City, as the planning lead agency. However, it is not within the authority of the District to implement off-site improvements that are not within its jurisdiction; nor is the District obligated to ensure that off-site projects, including the City's SRTS improvements, are implemented. Proposed SRTS improvements that are described on Page 5.10-6 of the DEIR are being undertaken separately by the City of Santa Monica, and are not in the jurisdiction of the SMMUSD. They involve sidewalk improvements, curb extensions, and pedestrian markings that are within the public right-of-way of the City of Santa Monica, and outside of SMMUSD property. Although the surrounding sidewalks/streets are outside of the District's jurisdiction (within the jurisdiction of the City of Santa Monica) the Proposed Project would not conflict with the goals and objectives the City's SRTS program, and the ability of these improvements to proceed as planned. As described on page 5.10-16 of the DEIR, implementation of the Proposed Project includes numerous improvements to vehicular and pedestrian safety access points that meet the intent of SRTS strategies identified in the SCAG's Active Transportation Technical Report:

- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

These proposed improvements would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the "Street Design/Engineering Strategies" section of the 2021 Safe Routes Partnership Guidelines.

Therefore, implementation of above-referenced features would meet the intent of the City's SRTS program and reduce impacts to pedestrians and bicyclists that would result from the proposed Project. The DEIR adequately analyzes all pedestrian impacts of the Proposed Project.

Additionally, as stated on page 5.10-17 of the DEIR, the Proposed Project would not result in an increase in vehicle trips to and from the school when compared to existing conditions. Thus, a TDM would not be necessary for the Proposed Project. The District. Additionally, the District participates in programs such as the "Bike It Walk It" program

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as described on page 5.10-4, and has students enrolled in the Metro GoPass TAP card program for public transit, as described on page 5.10-16 of the DEIR, which encourage use of alternative methods of accessing the campus. These programs are in line with goals of a transportation demand management (TDM) program as requested by the commenter, and are adequately described in the DEIR. Lastly, the DEIR appropriately evaluates potential VMT impacts, and has determined that VMT impacts would be less than significant and therefore no mitigation measures are necessary. Therefore, no further changes to the DEIR are required.

The proposed design option referenced above does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O1-28 The commenter requests that comments previously submitted during scoping period on Santa Monica Families for Safe Streets and RTP consistency are addressed. The District did not receive a comment letter from the commenter or Santa Monica Families for Safe Streets during the scoping period, nor did the commenter attend the public scoping meeting at Grant ES held on February 7, 2023. Nevertheless, the District has met with this group on two occasions during preparation of the DEIR to understand their concerns, which were taken into consideration during preparation of the DEIR. The District also provided a detailed response to similar comments provided by the commenter on the McKinley ES FEIR, which are incorporated by reference into this response (June 2023). As detailed in the responses to this letter and in the DEIR, the District has adequately analyzed transportation impacts.

O1-29 The commenter requests that comments provided by Caltrans during the scoping period for the DEIR be addressed.

All comments provided during the scoping period have been considered when preparing the DEIR. Additionally comments provided by Caltrans on the DEIR do not suggest significant transportation impacts. Please see response to comment O1-27 and responses to Caltrans letter A1 above.

O1-30 The commenter emphasizes comments received in the scoping period regarding avoiding worsening traffic congestion along 24<sup>th</sup> Street. Please see comment response O1-28.

O1-31 The commenter states that the Grant Master Plan remains inconsistent with the SCAG RTP/SCS and that a VMT study and/or mitigation measures may be required.

As discussed in comment response O1-5, the VMT analysis contained in the DEIR and Appendix K, *Access and Pedestrian Safety Analysis*, is consistent with the City of Santa

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Monica’s process for analyzing the transportation impacts of land use and transportation projects, which is consistent with State law set forth by the California Office of Planning and Research (Governor’s Office of Planning and Research 2018). The Proposed Project was reviewed against the City’s VMT screening criteria system to determine if a VMT analysis would be required. Under Tier 1 of the City’s VMT screening criteria, projects that required development of specific land uses are screened out from further analysis, including new construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increased, 75 percent of the student body comes from within two miles of the school. The Proposed Project falls under Tier 1 of the City’s screening criteria and is screened out from further VMT analysis.

As demonstrated on page K-8 of the DEIR (Appendix K), the Proposed Project is screened out from further VMT analysis under VMT Screening Criteria (d):

New construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increased, 75 percent of the student body comes from within 2.0 miles of the Campus.

Additionally, as discussed in response to comment O1-2, the Proposed Project would not conflict with the 2020-2045 RTP/SCS “core vision” regarding maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together and increasing investments in transit and complete streets. Therefore, the Proposed Project would be consistent with the SCAG RTP/SCS, and the DEIR adequately analyzes all transportation impacts of the Proposed Project.

Therefore, the DEIR adequately assesses the Proposed Project’s consistency with the RTP/SCS and potential VMT impacts, and appropriately applies the City of Santa Monica VMT screening thresholds. No further VMT analysis or changes to the DEIR are warranted.

O1-32 The commenter states that the EIR claims there is no increase in student capacity, however the increase in new classrooms would cause an increase in student capacity.

As described in comment response O1-6, while there are 12 additional classrooms provided by the Proposed Project, these classrooms are serving the existing capacity of the school and are designed to better meet the goals of the Districtwide Educational Specifications, which shift the instructional design of the past—defined by a traditional teacher-at-the-front-of-the-classroom style of learning—to one that provides for rotational learning in the classroom, incorporating a variety of project-based learning

## 2. Responses to Comments

experiences that allow simultaneous individualized, small group, and large group instruction, as described on page 3-1 of the DEIR. 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. Therefore, additional classroom space does not equate to increased capacity as the commenter claims. As detailed on page 4-8 of the DEIR, Section 4.3.3.1, *Student Enrollment*, Grant ES has been experiencing steadily decreasing enrollment since 2013, from a high of 665 students to 550 in the 2022-2023 school year. The Grant ES student capacity is based on California Department of Education standards that assess the current capacity at a maximum enrollment of 915 students. This is a maximum where space is used as a classroom and is full of students. Based on the classroom maximums negotiated in the current collective bargaining agreement with the Santa Monica-Malibu Classroom Teachers Association, the maximum enrollment capacity at Grant ES is 809 students. However, neither of these maximum capacity numbers reflect current instruction practice or is anticipated based on actual enrollment trends. Based on the Districtwide Educational Specifications, the current campus could support up to a maximum of 675 students.

The DEIR provides substantial evidence to support that the Proposed Project would not increase the campus capacity but would support the District's goals and objectives outlined in the Districtwide Education Specifications in the 2019 SMMUSD Education Master Plan (SMMUSD 2019). Therefore, no revisions to the DEIR are necessary.

O1-33 The commenter states that the increase in new classrooms would cause an increase in student capacity and references future residential development (such as from redevelopment of the Santa Monica Airport site) as growth that would result in additional students in the future. The District, who is responsible for forecasting enrollment projections and planning for the future of all students it serves, does not foresee an increase in enrollment, nor would the Proposed Project affect the capacity of the school for the future. Please refer to comment response O1-32.

O1-34 The commenter states that the EIR lacks evidence to support that the net increase in parking supply will not increase VMT. The commenter also states that the expanded parking lot and new arrival court will induce new demand, cause more traffic on 24th Steet, and increase VMT/GHG.

As discussed in detail in response to comment O1-5 above, the Proposed Project falls under Tier 1 of the City's screening criteria and is therefore screened out from further VMT analysis. The increase in parking would better serve the needs of the school and would not increase VMT, and the additional parking would only shift the VMT parking in the neighborhood on the campus that in essence shortens VMT from having staff drive around the neighborhood seeking available on-street parking spaces.

## 2. Responses to Comments

- O1-35      The commenter states that there are no existing issues related to on-street parking because there is sufficient staff parking and that an increase in staff parking on the project site would cause increase in vehicle travel and trips.
- As described in comment response O1-4, regarding the request for no net increase in parking, the 62 existing parking spaces that are currently provided at Grant ES are not sufficient for current faculty, staff, and visitor needs. Santa Monica Municipal Code (SMMC) Section 9.28.060, Off-Street Parking, establishes off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, Parking Regulations By Use And Location, elementary schools located outside of one-half mile from a major transit stop should contain two parking spaces for each classroom. The nearest major transit stop is the 26th / Bergamot Station, 0.81 mile from the project site; therefore, two spaces per classroom is appropriate. There are currently 34 classrooms at Grant ES. Accordingly, the SMMC allows for a total of 68 parking spaces in current conditions (six less than what is allowed by code). Therefore, Grant ES is currently under-parked, resulting in the need for staff and visitors to circle local neighborhoods searching for limited street parking (increasing VMT). There is a demonstrated need for an increase in parking as proposed.
- The majority of faculty and staff at Grant ES do not reside near the campus, and there are limited regional transportation options with direct access to Grant ES (as mentioned, the nearest regional transportation stop is 0.81 miles away). Additionally, given staff primarily reside outside of Santa Monica, walking and bicycling to work is infeasible. Thus, commuting via automobile and the need for parking is necessary and the deficiency of parking below SMMC requirements is already an existing condition.
- O1-36      The commenter states that the net 12 new classrooms, expanded parking lot, and an arrival court will generate a new driving demand and cannot be considered as operating in the same capacity as the existing conditions. Please refer to the comment response O1-4 and O1-6.
- O1-37      The commenter states that the proposed project should implement a quick-build and low cost Safe Routes to School safety enhancements within the school zone. The commenter claims that without the Safe Routes to School Enhancements, the proposed project would not be consistent with eh SCAG 2020 RTP/SCS. Please refer to comment responses O1-2 and O1-7.
- O1-38      The commenter states that the Grant ES Master Plan is not consistent with the SCAG RTP/SCS because it includes an increase in parking capacity in an arbitrary manner from 62 to 94 spaces, without providing mitigation measures. Please refer to comment responses O1-4 and O1-35.
- O1-39      The commenter states that the Grant ES Master Plan is not consistent with the SCAG RTP/SCS because it claims no increase in student capacity despite the addition of net 12 new classrooms. Please refer to comment responses O1-6 and O1-32.

## 2. Responses to Comments

- O1-40      The commenter states that the Grant ES Master Plan is not consistent with the SCAG RTP/SCS because it does not include implementation of Safe Routes to School projects and does not improve pedestrian and bicycle safety, connectivity, or circulation. Please refer to comment responses O1-2 and O1-7.

## 2. Responses to Comments

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## 2. Responses to Comments

### Comment O2. Laurene von Klan, Climate Action Santa Monica

December 13, 2023

#### Comment Letter O2

Carey Upton, Chief Operations Officer  
Santa Monica-Malibu Unified School District  
1717 4th St  
Santa Monica, CA 90401

Draft EIR Comments Regarding Grant Elementary School Campus Master Plan Project (SCH #2023010229)

Dear Mr. Upton:

We are writing in hopes that the Grant School Master Plan will result in opportunities to fulfill the goals of the award-winning SMMUSD Districtwide Sustainability Plan and the Santa Monica Climate Action and Adaptation Plan (CAAP) goals. These plans highlight important considerations for the future of Santa Monica and the areas surrounding schools, including ways in which we can ensure healthier and more sustainable built environments. When planning ahead, it is also important to consider possible changes to school enrollment or capacity due to mandated new housing development targets. Given these considerations, we ask that SMMUSD address the needs that were identified in the current Grant Elementary Environmental Impact Report (EIR) regarding transportation alternatives and street safety measures.

O2-1

The transportation section of the District Sustainability Plan says its mission is to "Convert to environmentally friendly vehicles and fuels, reduce single occupancy vehicle trips, and encourage sustainable transportation methods such as carpooling, walking, and biking that enhance mobility and decrease congestion." The Grant EIR instead proposes to increase the number of parking spaces from 62 to 94 and add an "arrival court" for cars that will together induce more vehicle trips while making walking and biking more dangerous. We would like to see mitigation measures to the proposed project that truly embody the Sustainability Plan's mission, with heavy consideration of ways to encourage students, parents, and staff to arrive through alternative modes.

O2-2

SMMUSD has expressed a desire to align with the City's CAAP goals. The most prominent goal of the City's plan is to drastically reduce GHG emissions. The City's 2022 GHG Inventory showed that vehicle transportation accounts for 68.5% of total emissions in Santa Monica, by far the biggest contributor. Therefore, the biggest way for SMMUSD to align with the City's CAAP goals is by reducing its contribution to vehicle emissions. The current proposal will increase emissions by encouraging vehicle trips. What SMMUSD can do instead is work to meet CAAP goals by improving walking and biking access to the Grant campus.

O2-3

Given the long time horizon and expansionary nature of the proposed project, we noticed inconsistencies between statements in the EIR and other local information. For example, the EIR states that there will be no changes to "student enrollment and staffing," and this is a rationale for the "no significant impact" result. We question this information based on the recently updated Housing Element and state directive to build thousands of new residences in

O2-4

## 2. Responses to Comments

Santa Monica, including in Grant Elementary's enrollment zone, in the next few years. The EIR also claims no increase in student capacity despite expanding the number of classrooms by 12.

O2-4  
Cont'd

Even as SMMUSD's own plans, as well as city and regional plans, call for increased alternative transportation modes, the Grant EIR features a 50% increase in parking spaces, which favors driving habits. Given that Grant Elementary [is in an urban heat zone](#), reduction of paved surface and addition of permeable surface with vegetation, which can provide other benefits, should be a priority instead. Going ahead with this proposal without providing mitigation measures will take us backwards in our quest to reach our climate goals while worsening congestion in the area.

O2-5

Instead of shaping Grant Elementary to be a more conventional school where most students are dropped off by car, SMMUSD can seize this opportunity provided by the master planning process and set Grant Elementary on a path of climate leadership. The nature of our built environment plays a significant role in driving the mobility options people choose getting to and from school. To encourage walking and biking, and reduce vehicle traffic, we request these changes to the Grant Elementary Master Plan:

O2-6

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Most critical, expand the main Pearl St drop off/pick up area to meet current needs for cargo bikes and other micro mobility drop offs and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by redeveloping the Pearl St staff/visitor parking lot.
2. Reduce the amount of any additional car parking to net zero (e.g. only replace what would be lost in one area with the same number of spaces in another area).
3. Improve connections from the school to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate them with the campus plan.
4. Implement Transportation Demand Management strategies as referenced in the District Sustainability Plan and recommended by Caltrans in their EIR Scoping letter to you.

O2-7

O2-8

O2-9

Lastly, we strongly encourage schools to build and increase their engagement on how kids get to and from school. Allocating increased resources and focusing on how kids get to and from school affects the foundation of their education and the beginning of each day and can affect their school spirit. Thank you for exploring ways to address these concerns.

O2-10

Signed,

Kent Strumpell and Laurene von Klan- Climate Action Santa Monica  
 Cris Gutierrez and Cynthia Rose - Santa Monica Safe Streets Alliance, Co-Chairs  
 Boris Suchkov – Santa Monica Families for Safe Streets  
 Brad Ewing and Carl Hansen - Santa Monica Forward, Co-Chairs



## 2. Responses to Comments

### O2. Response to Comments from Laurene von Klan, Climate Action Santa Monica, provided via email on December 13, 2023.

O2-1 The commenter states that they hope that the Proposed Project will result in opportunities to fulfill the goals of the District's Sustainability Plan and the Santa Monica Climate Action and Adaptation Plan (CAAP). The commenter provides a description of the plans and request that the District consider these plans in regards to transportation alternatives and street safety measures of the Proposed Project in the DEIR.

Additionally, the commenter states that it is important to consider possible changes to school enrollment or capacity due to mandated new housing development targets. However, as demonstrated throughout the DEIR, the Proposed Project would not result in an increase in student enrollment. Further, the commenter does not identify any specific housing development targets it is referring to and does not explain why or how any housing development target would cause a significant increase in enrollment at Grant ES considering that the school's attendance boundary is fully developed.

This comment provides introductory information to their subsequent comments and neither identifies a specific deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

O2-2 The commenter infers that the Proposed Project conflicts with the District's Sustainability mission with the proposed increase of parking spaces from 62 to 94, and the additional of an arrival court, as described in the DEIR. The commenter requests the implementation of mitigation measures that embody the Sustainability Plan's mission, and considers was to encourage students, parents, and staff to use alternative modes of transportation.

As described in comment response O1-4, no significant transportation impacts were identified in the DEIR; however, in response to comments received during the public review period of the DEIR, the District has included a design option in the Proposed Project's Description that would include removal of the existing 14-space administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove the 14 parking spaces from the existing parking lot during the Phase 3 of the Proposed Project, and redesign this area into a new community plaza for pick up and drop off, which would be accessible to pedestrians and bicyclists via 24th Court (see Figure 3-9, *Design Option, Pearl Street Community Plaza*, of the FEIR). This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions).

Additionally, as described on page 5.10-16 of the DEIR, implementation of the Proposed Project includes numerous improvements to vehicular and pedestrian safety access points that meet the intent of the City's SRTS strategies identified in the SCAG's Active Transportation Technical Report:

## 2. Responses to Comments

- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

These proposed improvements would serve to further reduce pedestrian and traffic conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the “Street Design/Engineering Strategies” section of the 2021 Safe Routes Partnership Guidelines. Thus, the Proposed Project would not conflict with the District’s mission to encourage sustainable transportation methods.

However, the majority of faculty and staff at Grant ES staff primarily reside outside of Santa Monica, walking and bicycling to work is largely infeasible, and there are limited regional transportation options with direct access to Grant ES (the nearest regional transportation stop is 0.81 miles away). Thus, commuting via automobile and the need for parking is necessary. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms, and consistency with the parking requirements set forth in the SMMC would allow for 92 parking spaces. With the inclusion of the proposed design option in this FEIR, the Proposed Project would include 80 parking spaces, which is still well below SMMC allowed spaces. The reconfigured parking lots with additional spaces are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and drive time/miles searching for street parking). The increase in 18 parking spaces under the design option as presented in this FEIR would better serve the existing employees and visitors on campus. Implementation of the Proposed Project would not increase the student and staff population and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change. See response to comment O1-9 regarding the request for additional VMT analysis.

In addition, the arrival court would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street, to avoid having to cross vehicular circulation within the new parking lots. The arrival court would not be used to for vehicular drop off/pick up. References to the arrival court in the DEIR have been revised

## 2. Responses to Comments

to indicate that the arrival court is intended for pedestrians and bicyclists only, and no vehicles would be allowed, as show in Chapter 3, Revisions to the DEIR, of this FEIR.

The minor modification to Chapter 3, *Project Description*, and Section 5.10, *Transportation*, regarding the design option and proposed use of the arrival court, does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

O2-3 The commenter states that the District has expressed a desire to align with the City's CAAP goals, and the reduction of GHG emissions. As such, the commenter states that in order to align with the City's CAAP goals, the District should reduce its contribution to vehicle emissions, and the Proposed Project will increase emissions by encouraging vehicle trips. Instead, the District should improve walking and biking access to the campus.

As stated on page 5.10-17 of the DEIR, the Proposed Project would not result in an increase in vehicle trips to and from the school when compared to existing conditions because student capacity and staffing would not increase or change after full buildout of the three construction phases; thus, the Proposed Project would not result in an increase in GHG emissions from mobile sources.

The District is in regular communication and partnership with the City of Santa Monica to ensure vehicular and pedestrian safety around all school sites. The DEIR identifies specific improvements proposed by the City on page 5.10-6 and will continue to coordinate with the City to ensure they are implemented and reflective of the needs of the campus, as stated on page 5.10-17 of the DEIR. As described in comment response O1-7, the City, in coordination with the District, as well as staff and caretakers, has identified additional priority SRTS projects in off-site locations under the jurisdiction of the City, as the planning lead agency. However, SRTS projects are not part of the Proposed Project and are not within the authority of the District to implement off-site improvements that are not within its jurisdiction; nor is the District obligated to ensure that off-site projects, including the City's SRTS improvements, are implemented.

The DEIR adequately analyzes all transportation impacts of the Proposed Project. The proposed design option does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

## 2. Responses to Comments

O2-4 The commenter states that there are inconsistencies between the DEIR and other local information, including the DEIR's statement that there will be no changes to student enrollment and staffing. The commenter states that because of the recently updated Housing Element and the construction of new residences in Santa Monica.

As describe in comment response O1-6 and demonstrated throughout the DEIR, the Proposed Project would not result in an increase in student enrollment. While there are 12 additional classrooms provided by the Proposed Project, these classrooms will serve the existing capacity of the school and are designed to better meet the goals of the 2019 Districtwide Educational Specifications, which shift the instructional design of the past—defined by a traditional teacher-at-the-front-of-the-classroom style of learning—to one that provides for rotational learning in the classroom, incorporating a variety of project-based learning experiences that allow simultaneous individualized, small group, and large group instruction, as described on page 3-1 of the DEIR. 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. Therefore, additional classroom space does not equate to increased capacity as the commenter claims.

Additionally, as detailed on page 4-8 of the DEIR, Section 4.3.3.1, *Student Enrollment*, Grant ES has been experiencing steadily decreasing enrollment since 2013, from a high of 665 students to 550 in the 2022-2023 school year. The Grant ES student capacity is based on California Department of Education standards that assess the current capacity at a maximum enrollment of 915 students. This is a maximum where space is used as a classroom and is full of students. Based on the classroom maximums negotiated in the current collective bargaining agreement with the Santa Monica-Malibu Classroom Teachers Association, the maximum enrollment capacity at Grant ES is 809 students. However, neither of these maximum capacity numbers reflect current instruction practice or is anticipated based on actual enrollment trends. Based on the 2019 Districtwide Educational Specifications, the current campus could only support up to a maximum of 675 students.

Therefore, the DEIR provides substantial evidence to support that the Proposed Project would not increase the campus capacity but would support the District's goals and objectives outlined in the 2019 Districtwide Educational Specifications in the 2019 SMMUSD Education Master Plan (SMMUSD 2019); and no revisions to the DEIR are necessary.

O2-5 The commenter states that the Proposed Project would include a 50 percent increase in parking spaces which would encourage driving which would conflict with their request to reach their climate change goals and worse congestion in the area. The commenter states that the District should prioritize the reduction of paved surface and addition of permeable surface with vegetation.

## 2. Responses to Comments

Following public comments, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, *Revisions to the DEIR*), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24th Court, thereby reducing the number of proposed parking spaces. The area would serve as a pedestrian plaza for student access. This would result in an overall increase in parking of 18 spaces (compared to the 62 that are existing, or 29 percent increase). The reduction in proposed parking would not change the environmental impact analysis contained in the DEIR as the parking demand factors (i.e., school capacity and staffing) would not change, as discussed in response to comment R7-1 above. Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures; therefore, no further analysis is required.

- O2-6 The comment states that the District should evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation, which would compensate for the loss of green space during Phase 1 of the Proposed Project. The commenter states that this can most readily be done by redeveloping the Pearl Street staff/visitor parking lot.

As described in comment response O1-4, in response to comments received during the public review period of the DEIR, the District has included a design option in the Proposed Project's Description that would include removal of the administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove the 14 parking spaces from the existing parking lot during the Phase 3 of the Proposed Project consistent with the commenters request, and implement a new community plaza, which would be accessible to pedestrians and bicyclists via 24<sup>th</sup> Court (see Figure 3-9, Design Option, *Pearl Street Community Plaza*, of the FEIR). This additional non-automobile drop-off/pick-up area would offset any reduction in spaces associated with the expansion of student outdoor play areas in Phase 1.

This minor modification to Chapter 3, *Project Description*, does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

- O2-7 The commenter states that the District should reduce the amount of any additional car parking to net zero, and only replace what would be lost in one area with the same number of spaces in another area.

## 2. Responses to Comments

In response to comments received during the public review period, the District may implement the design option, to repurpose the existing visitor and administrative parking into a community plaza, reducing overall parking on the campus from 94 to 80 parking spaces. As described in comment response O1-4, the reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces would better serve the existing employees and visitors on campus who presently primarily drive to campus, and would still be below SMMC parking ratios for the school use. The 62 existing parking spaces that are currently provided are not sufficient for current faculty, staff, and visitors at Grant ES. The majority of faculty and staff at Grant ES do not reside near the campus, and there is limited regional transportation with direct access to the site. Additionally, given staff housing locations, walking and bicycling to work is infeasible. Thus, commuting via automobile and the need for parking is necessary and already an existing condition. However, implementation of the Proposed Project would not increase the student and staff population, and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change.

- O2-8 The commenter states that the District should improve connections from the school to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) are supported with the implementation of the Proposed Project.

As described in comment response O1-17, the District participates in programs such as the “Bike It Walk It” program, and has students enrolled in the Metro GoPass TAP card program for public transit, as described on page 5.10-16 of the DEIR, which encourage use of alternative methods of accessing the campus.

Additionally, Proposed SRTS improvements that are being undertaken separately by the City of Santa Monica are separate projects not part of the Proposed Project and are not in the jurisdiction of the SMMUSD; nor is the Proposed Project dependent upon the City’s SRTS improvements to be consistent with SCAG’s RTP/SCS. The City, in coordination with the District, as well as staff and caretakers, has identified additional priority SRTS projects in off-site locations under the jurisdiction of the City, as the planning lead agency. However, it is not within the authority of the District to implement off-site improvements that are not within its jurisdiction; nor is the District obligated to ensure that off-site projects, including the City’s SRTS improvements, are implemented.

## 2. Responses to Comments

All indications point to the fact that the City is implementing the SRTS improvements; however, a less-than-immediate timeline does not make the SRTS improvement projects uncertain.

Implementation of the Proposed Project includes numerous improvements to vehicular and pedestrian safety access points that meet the intent of SRTS strategies identified in the SCAG's Active Transportation Technical Report. Therefore, the DEIR adequately analyzes all transportation impacts of the Proposed Project.

O2-9 The commenter states that the District should implement TDM strategies as referenced in the District Sustainability Plan and recommended by Caltrans.

As described in comment response O1-17, the Proposed Project would not increase the student or employment population at Grant ES, and the attendance boundaries of the school would not change. Therefore, the Proposed Project would not result in an increase in vehicle trips to and from the school when compared to existing conditions. Thus, a TDM would not be necessary for the Proposed Project.

Additionally, the District participates in programs such as the "Bike It Walk It" program and has students enrolled in the Metro GoPass TAP card program for public transit, as described on page 5.10-16 of the DEIR, which encourage use of alternative methods of accessing the campus. These programs are in line with goals of a TDM program as requested by the commenter, and are adequately described in the DEIR. Additionally, Caltrans provided a comment letter in response to the DEIR (see comment letter A1 and responses to comments A1-1 through A1-6). Their comments, as the lead authority on transportation issues for state facilities, does not indicate the need for a TDM program. Therefore, no further changes to the DEIR are required.

O2-10 The commenter states their encouragement for schools to build and increase their engagement on how kids get to and from school because it affects the foundation of their education and the beginning of each day and can affect their school spirit.

The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact.

## 2. Responses to Comments

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## 2. Responses to Comments

### Comment R1. Tracey Hom

**From:** Tracey Hom [REDACTED] **Comment Letter R1**  
**Sent:** Tuesday, October 31, 2023 9:53 AM  
**To:** Board of Education <brd@smmusd.org>; Roni Crichton <roni.crichton@gmail.com>; Betty Mednick <betty@mednicks.com>  
**Subject:** Grant elementary

School Board

Once again you are wasting our tax payer money. Grant Elementary does not need to be redeveloped. All it needs at most is for you to handle the overdue deferred maintenance. It is an adorable neighborhood school and should not be turned into your next vanity project. R1-1

Tracey P. Hom Esq.  
[REDACTED]  
[REDACTED]  
[REDACTED]

## 2. Responses to Comments

### **R1. Response to Comments from Tracey Hom, provided via email on October 31, 2023.**

R1-1 The commenter states that the District is wasting tax payer money, since Grant ES does not need to be redeveloped and would only require maintenance.

The Proposed Project represents an improvement to an existing school and would renovate and modernize the existing Grant ES campus. The Proposed Project will implement the goals of the Districtwide Educational Specifications to improve the learning environment for the school's students.

This comment is not a direct comment on the content or adequacy of the DEIR and does not raise a specific environmental issue. As directed by section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required.

## 2. Responses to Comments

### Comment R2. Mario Melgarejo

**Comment Letter R2**

**COMMENT CARD / TARJETA de COMENTARIO**  
**Community Informational Meeting / Reunión de Información Comunitario**  
Grant Elementary School / Escuela Primaria Grant  
November 29, 2023 / 29 de noviembre, 2023

Name / Nombre: Mario Melgarejo

Affiliation / Afiliación: Climate Action Santa Monica / Nearby resident

Address / Dirección: [REDACTED]

Comments / Comentarios: The school district should not be considering any changes that will increase the number of cars in the area. ~~From 62~~ From 62 to 94 spaces ZNB should be looking for ways to take advantage of the areas compactness and bike lanes. Increase bike parking (maybe add space for cargo bikes?). The EIR mentions Safe Routes to School but doesn't describe how any SRTS features would be implemented. We should be encouraging people to use other ways to

Written comments must be received no later than December 13, 2023 at the following address:  
*Los comentarios escritos deben recibirse a más tardar el 13 de diciembre, 2023 a la siguiente dirección:*

Santa Monica-Malibu Unified School District  
1717 4<sup>th</sup> Street  
Santa Monica, California 90401  
Attention: Carey Upton - FIP Department

get here  
not  
encourage  
more driving.

R2-1  
R2-2

## 2. Responses to Comments

### R2. Response to Comments from Mario Melgarejo, provided via comment card on November 29, 2023.

R2-1 The commenter states that the District should not increase the number of parking spaces on the Grant ES campus, and instead should increase pedestrian and bicycle infrastructure.

In response to comments received during the public review period of the DEIR, the District has included a design option in the Proposed Project's Description that would include removal of the administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove the 14 parking spaces from the existing parking lot during the Phase 3 of the Proposed Project, and implement a new community plaza, which would be accessible to pedestrians and bicyclists via 24<sup>th</sup> Court (see Figure 3-9, *Design Option, Pearl Street Community Plaza*, of the FEIR). This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions).

The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces will better serve the existing employees and visitors on campus. The 62 existing parking spaces that are currently provided are not sufficient for current faculty, staff, and visitors at Grant ES. The majority of faculty and staff at Grant ES do not reside near the campus, and there is limited regional transportation with direct access to the site. Additionally, given staff locations, walking and bicycling to work is infeasible. Thus, commuting via automobile and the need for parking is necessary and already an existing condition. However, implementation of the Proposed Project would not increase the student and staff population, and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school.

Additionally, the Proposed Project would comply with § 9.28.060, *Off-Street Parking*, of the Santa Monica Municipal Code (SMMC) Section, which establishes off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, of the SMMC elementary schools located outside of one-half mile from a major transit stop, should contain approximately 2 parking spaces for each classroom. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms; thus in compliance with the SMMC, the campus could contain approximately 92 parking spaces. However, with the inclusion of the proposed design option, the Proposed Project would only include 80 parking spaces.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the

## 2. Responses to Comments

environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change.

The minor modification to Chapter 3, *Project Description*, does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

R2-2 The commenter states that the DEIR mentions the City's SRTS program but does not describe SRTS features that would be implemented. In addition, the District should be encouraging people to use non-vehicular forms of transportation.

As described in comment response O1-7, the City, in coordination with the District as well as staff and caretakers, has identified additional priority SRTS projects in off-site locations under the jurisdiction of the City, as the planning lead agency. However, it is not within the authority of the District to implement off-site improvements that are not within its jurisdiction; nor is the District obligated to ensure that off-site projects, including the City's SRTS improvements, are implemented.

As stated on page 5.10-16 of the DEIR, the Proposed Project includes improvements to vehicular and pedestrian safety access points that would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and would meet the intent of SRTS strategies identified in SCAG's Active Transportation Technical Report:

- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

Therefore, the DEIR adequately analyzes all transportation impacts of the Proposed Project.

## 2. Responses to Comments

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## 2. Responses to Comments

### **Comment R3. Verbal comment provided by Commenter #1, received during the November 29 Community Information Meeting**

#### **R3. Response to Comments from Commenter #1**

R3-1 The commenter asked what considerations were made to reduce the school's energy use (e.g. rooftop solar panels).

As stated on page 5.4-12 of the DEIR, although the Proposed Project would generate new energy demand at the site, it would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements as well as the District's Sustainability Plan, including measures for energy efficient lighting and higher efficiency HVAC units. In addition, the Building Energy Efficiency Standards mandate an increase in building energy efficiency every three years, the new buildings to be constructed would be more energy efficient than the existing school buildings to be replaced. In addition, the Proposed Project would be solar ready and would include features such as occupancy sensors for classrooms and offices that more efficiently use energy. Thus, because the Proposed Project would comply with these regulations and would provide features to decrease electricity use by the campus, it would not result in wasteful, inefficient, or unnecessary electricity demands even though the Proposed Project would consume more energy.

Therefore, the DEIR adequately analyzes all energy impacts of the Proposed Project, and no revisions are necessary.

## 2. Responses to Comments

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## 2. Responses to Comments

### **Comment R4. Verbal comment provided by Commenter #2, received during the November 29 Community Information Meeting**

#### **R4. Response to Comments from Commenter #2.**

R4-1 The commenter states that the District did not provide sufficient community outreach for the Proposed Project, and the District should provide childcare during the community meeting.

The District has held four community meetings for the Proposed Project since June 2021, to gather feedback from the community regarding the Campus Master Plan and as part of the environmental review process required by CEQA, as described on page 3-18 of the DEIR. Meetings were held on the following dates:

- June 21, 2021, to gather input on the Campus Master Plan
- March 10, 2022, to gather input on the Campus Master Plan
- February 7, 2023, scoping meeting as part of the CEQA process
- November 29, 2023, informational meeting about the DEIR as part of the CEQA process

Notification of each of these meetings were provided to the campus and community. The scoping meeting and DEIR informational meeting were properly noticed meeting the requirements of the CEQA Guidelines. While the District did not provide childcare specifically for these meetings, students and families are welcome at all public meetings.

Therefore, the District provided sufficient community outreach for the Proposed Project. The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

R4-2 The commenter states that the DEIR is incorrect in claiming that the majority of students currently arrive at school by car.

As stated on page 5.10-12 and Appendix K, of the DEIR, field observations on a typical school day were conducted on Tuesday, May 3, 2022, which identified existing traffic patterns, access points, drop off/pick up operations, pedestrian/vehicular conflict areas, and pedestrian circulation. The method of school transportation for students can vary any given day and is highly variable. The Proposed Project ensures accessibility and safety for all modes of transportation, and properly evaluates environmental impacts associated with the proposed improvements.

Therefore, the DEIR adequately analyzes all transportation-related impacts of the Proposed Project, including DOPU at Grant ES, and no revisions are necessary. The

## 2. Responses to Comments

SMMUSD Board of Education will consider all comments prior to the finalization of this Proposed Project.

- R4-3 The commenter states that the District should implement a Transportation Demand Management (TDM) program.

As stated throughout the DEIR including on page 5.10-17 of the DEIR, the Proposed Project would not increase the student or employment population at Grant ES, and the attendance boundaries of the school would not change. Therefore, the Proposed Project would not result in an increase in vehicle trips to and from the school when compared to existing conditions. Thus, a TDM would not be necessary for the Proposed Project.

Therefore, the DEIR adequately analyzes all transportation-related environmental impacts of the Proposed Project, and no revisions are necessary.

- R4-4 This comment states that the District should repurpose the Pearl Street parking lot into an arrival court, used for drop-off/pick-up area for cargo bikes and other non-vehicular modes of transportation.

In response to comments received during the public review period of the DEIR, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, *Revisions to the DEIR*), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24th Court, thereby reducing the number of proposed parking spaces. The area would serve as a pedestrian plaza for student access. This would result in an overall increase in parking of 18 spaces (compared to the 62 that are existing). The reduction in parking would not change the environmental impact analysis contained in the DEIR as the parking demand factors (i.e., school capacity and staffing) would not change.

The proposed design option does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

## 2. Responses to Comments

### **Comment R5. Verbal comment provided by Commenter #3, received during the November 29 Community Information Meeting**

#### **R5. Response to Comments from Commenter #3.**

R5-1 This commenter states that they don't see how a 50 percent increase in parking would not result in additional vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions.

While the Proposed Project would include an increase in parking spaces, there would be no change to the operational characteristics of the school. The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). There would be no change in student population, student boundaries, or staffing, which are the factors that would result in induced vehicle trips and VMT. Since the modernized school campus would continue to be a local-serving land use and because the Proposed Project would not result in an increase in student capacity or staff or reduce options to safe multimodal access to campus, the Proposed Project would not generate an increase in VMT. Thus, because student capacity and staffing would not increase or change after full buildout of the three construction phases, the Proposed Project would not result in an increase in GHG emissions from mobile sources.

Additionally, in response to comments received during the public review period of the DEIR, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, *Revisions to the DEIR*), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24th Court, thereby reducing the number of proposed parking spaces. This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions). The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. Additionally, the Proposed Project would comply with § 9.28.060, *Off-Street Parking*, the SMMC Section, which established off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, of the SMMC elementary schools located outside of one-half mile from a major transit stop, should contain approximately 2 parking spaces for each classroom. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms; thus in compliance with the SMMC, the campus could contain approximately 92 parking spaces.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the

## 2. Responses to Comments

environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change.

Additionally, the VMT analysis contained in the DEIR and Appendix K, Access and Pedestrian Safety Analysis, is consistent with the City of Santa Monica's process for analyzing the transportation impacts of land use and transportation projects, which is consistent with State law set forth by the California Office of Planning and Research. The Proposed Project was reviewed against the City's VMT screening criteria system to determine if a VMT analysis would be required. Under Tier 1 of the City's VMT screening criteria, projects that required development of specific land uses are screened out from further analysis. The Proposed Project falls under Tier 1 of the City's screening criteria and is screened out from further VMT analysis.

As demonstrated on page K-8 of the DEIR (Appendix K), the Proposed Project is screened out from further VMT analysis under VMT Screening Criteria (d):

New construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increased, 75 percent of the student body comes from within 2.0 miles of the Campus.

Since the Proposed Project would not increase enrollment, further VMT analysis is not required. Additionally, though there is some variation year-to-year, roughly 90 percent of the student body is from within two miles of the Grant ES campus. Thus, the DEIR adequately assesses potential VMT impacts and appropriately applies the City of Santa Monica VMT screening thresholds. No further VMT analysis or changes to the DEIR are warranted.

Therefore, the DEIR adequately analyzes all transportation and GHG impacts of the Proposed Project. The proposed design option does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

## 2. Responses to Comments

### Comment R6 Diana Williams

#### Comment Letter R6

**From:** Diana Williams [REDACTED]  
**Sent:** Saturday, December 9, 2023 3:07 PM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Endorsing Santa Monica families for Safe Streets counterproposal

I live at 25th & California. What the area around Grant needs is less car traffic and more pedestrian and bike safety measures.

R6-1

## 2. Responses to Comments

### R6. Response to Comments from Diana Williams, provided via email on December 9, 2023

R6-1 This comment states that the area surrounding the Grant ES campus needs less vehicular traffic and more safety measures for pedestrians and bicyclists. As discussed on page 5.10-16 of the DEIR, the Proposed Project would include improvements to vehicular and pedestrian safety access points that would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and would meet the intent of SRTS strategies identified in SCAG's Active Transportation Technical Report:

- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

Additionally, in response to comments received during the public review period of the DEIR, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, Revisions to the DEIR), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24th Court, thereby reducing the number of proposed parking spaces. This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions). The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. Additionally, the Proposed Project would comply with § 9.28.060, *Off-Street Parking*, the SMMC Section, which established off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, of the SMMC elementary schools located outside of one-half mile from a major transit stop, should contain approximately 2 parking spaces for each classroom. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms; thus in compliance with the SMMC, the campus could contain approximately 92 parking spaces.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the

## 2. Responses to Comments

environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change.

Therefore, the DEIR adequately analyzes all pedestrian impacts of the Proposed Project. The proposed design option does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

## 2. Responses to Comments

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## 2. Responses to Comments

### Comment R7 Jahan Bruce

**Comment Letter R7**

From: Jahan Bruce [REDACTED]  
Sent: Saturday, December 9, 2023 2:58 PM  
To: Upton, Carey <cupton@smmusd.org>  
Subject: Time to phase out personal Automobiles as student and faculty transportation.

Caution: This EXTERNAL email originated from outside SMMUSD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From:

Jahan Bruce

Dear Mr. Upton:

Grant Elementary is a neighborhood school where most students are still seen arriving by walking, rolling, or transit, not by car. The expansion of automobile infrastructure on the school campus, as proposed in the Grant Elementary Master Plan Environmental Impact Report (EIR), will have long-term negative impacts on how Grant students and staff travel to/from school, and on the neighborhood as a whole. It will result in more traffic congestion and pollution, reduce the number of students who take non-auto modes to/from Grant, and make it less safe to travel around the neighborhood. R7-1

The EIR proposes to increase parking capacity on campus by 50% and add an "arrival court" in an arbitrary manner unrelated to stated desired outcomes. The proposal also stands contrary to SMMUSD's environmental and sustainability goals. Proceeding with this proposal without providing mitigation measures will cause us to regress away from our quest to reach our climate goals while worsening congestion in the area. Enhanced automobile access is not a Project Objective; does not support student learning or safety; is not in any way justified by the EIR; and is a poor use of SMMUSD funds. R7-2

I request that the Final EIR incorporates the mitigation measures below, while aligning with the SMMUSD Sustainability Plan as well as community and outside stakeholder input.

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Most critical, expand the main Pearl St drop off/pick up area to meet current accessibility needs for cargo bikes and other micromobility modes and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by repurposing the Pearl St staff/visitor parking lot. R7-3
2. Reduce the amount of automobile parking to zero. Students should arrive by walking, biking, and busses. Allowing individual students to be individually dropped off and picked up is completely ridiculous and makes the school zone completely unsafe. R7-4
3. Improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate with the campus. R7-5
4. To mitigate future driving demand, implement meaningful Transportation Demand Management strategies for teachers and staff as referenced in your District Sustainability Plan and recommended by Caltrans in their Scoping EIR letter to you. R7-6
5. To allow students safe passage to and from school, as well as a quiet learning environment, establish a car free zone for two blocks in all directions from the school. R7-7

Thank you!

## 2. Responses to Comments

### R7. Response to Comment from Jahan Bruce, provided via email on December 9, 2023

R7-1. This comment states that most Grant ES students arrive by walking, rolling, or transit, and not by car; thus, the expansion of automobile infrastructure on the campus would have long-term negative impacts resulting from increased traffic congestion and pollution. They state that the Proposed Project would reduce the number of students who walk or bike to school and result in unsafe conditions for pedestrians and bicyclists in the neighborhood.

The improvements to the Grant ES Campus includes reconfiguration of existing parking lots among other pedestrian improvements as described in the DEIR, would provide circulation, access, and pedestrian improvements to serve all needs of the campus, including those of students, staff, visitors, and after-school community uses that will continue to occur.

The method of school transportation for students can vary any given day and is highly variable. The DEIR acknowledges the variety of transportation options used by students (see page 5.10-16 of the DEIR). The Proposed Project ensures improvements to accessibility and safety for all modes of transportation, and properly evaluates environmental impacts associated with the proposed improvements.

The DEIR properly evaluates transportation and air quality impacts associated with the Proposed Project. Although there is a proposed increase in parking spaces (which has been reduced in this FEIR as described below), that alone does not result in increased traffic trips or air quality emissions. The number of vehicle trips generated by the Grant ES Campus is based on the capacity of students and staff that attend the campus. And as described throughout the DEIR, student capacity and staffing levels would not be increased by the Project. The increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in an significant increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. Additionally, the Proposed Project would comply with § 9.28.060, *Off-Street Parking*, the SMMC Section, which established off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, of the SMMC elementary schools located outside of one-half mile from a major transit stop, should contain approximately 2 parking spaces for each classroom. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms; thus in compliance with the SMMC, the campus could contain approximately 92 parking spaces.

Therefore, the DEIR adequately analyzes all transportation-related impacts of the Proposed Project, and no revisions are necessary.

R7-2 The comment states that the Proposed Project would increase parking capacity on campus by 50 percent and add an arrival court in an arbitrary manner, which are contrary to

## 2. Responses to Comments

SMMUSD's environmental and sustainability goals. The commenter also states that increased parking is not an objective of the Proposed Project.

Following public comments, the District has provided a minor modification to Phase 3 of the Proposed Project (see Section 3, *Revisions to the DEIR*), which provides an option during final design for the District to remove the existing 14-space parking lot at the corner of Pearl Street and 24<sup>th</sup> Court, thereby reducing the number of proposed parking spaces. The area would serve as a pedestrian plaza for student access. This would result in an overall increase in parking of 18 spaces (compared to the 62 that are existing, or 29 percent increase). The reduction in proposed parking would not change the environmental impact analysis contained in the DEIR as the parking demand factors (i.e., school capacity and staffing) would not change, as discussed in response to comment R7-1 above. Given design of Phase 3 is not yet finalized and is dependent on future funding, the ultimate decision on removal of the 14 parking spaces will be dependent on the District's confirmation of short- and long-term needs of the campus. Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures. Additionally, the Proposed Project would comply with § 9.28.060, *Off-Street Parking*, the SMMC Section, which established off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, of the SMMC elementary schools located outside of one-half mile from a major transit stop, should contain approximately 2 parking spaces for each classroom. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms; thus in compliance with the SMMC, the campus could contain approximately 92 parking spaces.

All users of the campus were considered when developing the details of the Campus Master Plan, and the proposed improvements are consistent with the objectives of the Project which are defined on page 3-7 in Chapter 3, *Project Description*, of the DEIR. Clearly defined objectives include organizing the campus to provide safe student circulation (Objective 5) and providing for safe and secure schools (Objective 7). While increasing the number of parking spaces does not meet these objectives, the spatial reconfiguration of the parking lot meets both of these objectives.

As stated in Section 5.4, *Energy*, on page 5.4-7 of the DEIR, the SMMUSD's Districtwide Sustainability Plan provides a road map to formalize and unite the District's existing sustainability initiatives in addition to incorporating and integrating sustainability practices into student learning and District operations. While most of the measures under each focus area in the Sustainability Plan apply more broadly to District actions rather than to individual projects, the Proposed Project is consistent with the broad strategies outlined in the Sustainability Plan, particularly for the energy efficiency and renewable energy focus area. Since student capacity and staffing would not increase or change after full buildout of the three construction phases, implementation of the Proposed Project would not

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result in additional trips or an increase in VMT and would not result in additional reliance on fossil fuel consumption. Additionally, implementation of the Proposed Project would be required to comply with the latest Building Energy Efficiency Standards and CALGreen standards and would be solar ready. In addition, the Proposed Project would establish lighting- and equipment-efficiency standards for all new equipment that meet or exceed the California Building Standards Code. Therefore, the Proposed Project would not interfere with implementation of the District's Sustainability Plan.

In addition, as described in comment response O1-4, the arrival court would provide safe access to the campus for pedestrian and bicyclists only and would not be used to for vehicular drop off/pick up. References to the arrival court in the DEIR have been revised, as shown in Chapter 3, *Revisions to the DEIR*, of this FEIR.

The minor modification to Chapter 3, *Project Description*, and Section 5.10, *Transportation*, regarding the proposed use of the arrival court, does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

R7-3 This comment states that the Proposed Project should incorporate five suggested mitigation measures. Each of those recommendations and a response for each are provided below.

Evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation.

While there have been no significant environmental effects identified in the DEIR after a thorough evaluation of impacts, in response to comments received during the public review period of the DEIR, the District has included a design option that would include removal of the administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove 14 parking spaces from the existing parking lot during the Phase 3 of the Proposed Project, and implement a new community plaza, which would be accessible only to pedestrians and bicyclists via 24<sup>th</sup> Court (see Figure 3-9, *Design Option, Pearl Street Community Plaza*, of the FEIR).

This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions). The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The

## 2. Responses to Comments

increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. Additionally, the Proposed Project would comply with § 9.28.060, *Off-Street Parking*, the SMMC Section, which established off-street parking requirements for the City of Santa Monica. As stated in Table 9.28.060, *Parking Regulations By Use And Location*, of the SMMC elementary schools located outside of one-half mile from a major transit stop, should contain approximately 2 parking spaces for each classroom. Upon completion of Phase 3, the Grant ES campus would contain a total 46 classrooms; thus in compliance with the SMMC, the campus could contain approximately 92 parking spaces.

Whether there is an increase in 18 parking spaces as presented in the design option in this FEIR, or 32 spaces as evaluated in the DEIR, there would be no change to the environmental analysis, impact conclusions, or mitigation measures, as the parking demand (student capacity and staffing) would not change. Therefore, the proposed design option does not require recirculation of the DEIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

R7-4 This comment states that parking at the Grant ES campus should be removed entirely, to allow students to arrive by walking, biking, and bussing to school.

There are 62 existing spaces that serve the Grant ES Campus, including staff, visitors, and other joint-use community uses. Parking is not solely used by students, and in fact is used primarily by staff. Removal of parking could result in increased congestion as staff search for neighborhood street parking, which already has limited capacity. Therefore, the District is not considering removal of parking at this time. Nor would removal of parking spaces reduce any physical environmental effects identified in the DEIR. The reconfiguration of spaces is intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). See Response to Comment R7-3 for further information on why additional parking would not increase VMT.

The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

R7-5 The comment states that the Proposed Project should improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (including SRTS) SMMUSD will support and integrate with the campus.

As discussed in comment R7-1, the Proposed Project would include improvements to vehicular and pedestrian safety access points that would serve to further reduce conflicts,

## 2. Responses to Comments

improve safety, and enhance micro-mobility use, and would meet the intent of SRTS strategies identified in SCAG's Active Transportation Technical Report. The District is in regular communication and partnership with the City of Santa Monica to ensure vehicular and pedestrian safety around all school sites. The DEIR identifies specific improvements proposed by the City on page 5.10-6 and will continue to coordinate with the City to ensure they are implemented and reflective of the needs of the campus, as stated on page 5.10-17 of the DEIR. As described in comment response O1-7, the City, in coordination with the District as well as staff and caretakers, has identified additional priority SRTS projects in off-site locations under the jurisdiction of the City, as the planning lead agency. However, it is not within the authority of the District to implement off-site improvements that are not within its jurisdiction; nor is the District obligated to ensure that off-site projects, including the City's SRTS improvements, are implemented.

The improvements to the Grant ES campus, which includes reconfiguration of existing parking lots among other pedestrian improvements as described in the DEIR, would provide circulation, access, and pedestrian improvements to serve all needs of the campus, including those of students, staff, visitors, and after-school community uses that will continue to occur.

The method of school transportation for students can vary any given day and is highly variable. The DEIR acknowledges the variety of transportation options used by students (see page 5.10-16 of the DEIR). The Proposed Project ensures improvements to accessibility and safety for all modes of transportation, and properly evaluates environmental impacts associated with the proposed improvements.

The DEIR properly evaluates transportation and air quality impacts associated with the Proposed Project. Although there is a proposed increase in parking spaces (which has been reduced in this FEIR as described below), that alone does not result in increased traffic trips or air quality emissions. The number of vehicle trips generated by the Grant ES Campus is based on the capacity of students and staff that attend the campus. And as described throughout the DEIR, student capacity and staffing levels would not be increased by the Project. The increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. See Response to Comment R7-3 for further information on why additional parking would not increase VMT.

The DEIR adequately analyzes all transportation impacts of the Proposed Project. The proposed design option does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed

## 2. Responses to Comments

Project. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

R7-6 The comment states that Transportation Demand Management strategies for teachers and staff should be implemented to mitigate future driving demand.

As stated on page 5.10-17 of the DEIR, the Proposed Project would not increase the student or employment population at Grant ES, and the attendance boundaries of the school would not change; 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. See Response to Comment R7-3 for further information on why additional parking would not increase VMT.

Therefore, the DEIR adequately analyzes all transportation impacts of the Proposed Project, and no revisions are necessary. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

R7-7 The comment states that a car free zone for two blocks in all directions from the school to allow students safe passage to and from school, as well as a quiet learning environment.

Changes to surrounding streets and circulation patterns, including closures of streets to vehicles, are in the jurisdiction of the City of Santa Monica and not the SMMUSD. The Proposed Project would not conflict with the goals and objectives the City's SRTS program.

The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

## 2. Responses to Comments

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## 2. Responses to Comments

### Comment R8 Rowan Sullivan

Comment Letter R8

From: rowan sullivan [REDACTED]  
Sent: Saturday, December 9, 2023 8:44 PM  
To: Upton, Carey <cupton@smmusd.org>  
Subject: Grant Elementary School Campus Master Plan Project - Support for Transportation Mitigation Measures - Safe Access for All Students & Parents

Caution: This EXTERNAL email originated from outside SMMUSD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Rowan Sullivan, [REDACTED]

Dear Mr. Upton:

We're a single-car household of 4 and we use our bike to drop our 2 year old off at the SaMoHi ITC. Whilst we see many SaMoHi students cycling to the school, the routes to the school can be improved and made safer for students - we often have to navigate between backed up lines of cars on Michigan Ave and swerve in and out of cones and cars pulling in and out of drop offs outside the school entrance before we get to the ITC. Whilst our kids are not currently at Grant, we would love to improve the access for students and parents walking, biking, or rolling to SMMUSD schools across the district, including Grant Elementary School. R8-1

Grant Elementary is a neighborhood school where most students are still seen arriving by walking, rolling, or transit, not by car. The expansion of automobile infrastructure on the school campus, as proposed in the Grant Elementary Master Plan Environmental Impact Report (EIR), will have long-term negative impacts on how Grant students and staff travel to/from school, and on the neighborhood as a whole. It will result in more traffic congestion and pollution, reduce the number of students who take non-auto modes to/from Grant, and make it less safe to travel around the neighborhood. R8-2

The EIR proposes to increase parking capacity on campus by 50% and add an "arrival court" in an arbitrary manner unrelated to stated desired outcomes. The proposal also stands contrary to SMMUSD's environmental and sustainability goals. Proceeding with this proposal without providing mitigation measures will cause us to regress away from our quest to reach our climate goals while worsening congestion in the area. Enhanced automobile access is not a Project Objective; does not support student learning or safety; is not in any way justified by the EIR; and is a poor use of SMMUSD funds. R8-3

I request that the Final EIR incorporates the mitigation measures below, while aligning with the SMMUSD Sustainability Plan as well as community and outside stakeholder input.

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Most critical, expand the main Pearl St drop off/pick up area to meet current accessibility needs for cargo bikes and other micromobility modes and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by repurposing the Pearl St staff/visitor parking lot. R8-4
2. Reduce the amount of any additional automobile parking to net zero (e.g. only replace what was lost in one area with the same number of spaces in another area to keep total spaces at 62). R8-5
3. Improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate with the campus. R8-6
4. To mitigate future driving demand, implement meaningful Transportation Demand Management strategies for teachers and staff as referenced in your District Sustainability Plan and recommended by Caltrans in their Scoping EIR letter to you. R8-7

Many thanks,  
Rowan and Family

## 2. Responses to Comments

### **R8. Response to Comments from Rowan Sullivan, provided via email on December 9, 2023**

R8-1 The commenter states that they regularly use bicycle routes to access other schools (Santa Monica High School) and would like to see improved access for students and caregivers walking, biking, or rolling to SMMUSD schools across the district, including Grant ES.

Page 5.10-16 of the DEIR provides a description of pedestrian and vehicular improvements that are provided as part of the Proposed Project and adequately analyzes environmental impacts associated with those improvements. The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

R8-2 This comment states that most Grant ES students arrive by walking, rolling, or transit, and not by car; thus, the expansion of automobile infrastructure on the campus would have long-term negative impacts resulting from increased traffic congestion and pollution. They state that the Proposed Project would reduce the number of students who walk or bike to school and result in unsafe conditions for pedestrians and bicyclists in the neighborhood. Please see response to comment R7-1 for further information regarding traffic congestion. See R7-3 for further information on why additional parking would not increase VMT.

R8-3 The comment states that the Proposed Project would increase parking capacity on campus by 50 percent and add an arrival court in an arbitrary manner, which are contrary to SMMUSD's environmental and sustainability goals. Please see response to comment R7-2 for further information regarding student capacity and the proposed arrival court. See R7-3 for further information on why additional parking would not increase VMT.

R8-4 This comment states that the Proposed Project should incorporate provided mitigation measures, which include evaluating drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation. Please response to comment R7-3.

R8-5 This comment states that parking at the Grant ES campus should be reduced to net zero, only replace what was lost in one area with the same number of spaces in another area.

While there have been no significant environmental effects identified in the DEIR after a thorough evaluation of impacts, in response to comments received during the public review period of the DEIR, the District has included a design option that would include removal of the administrative parking lot located at the northeast corner of the school, and implementation of a new community plaza. Please response to comments R7-3 and R7-4.

## 2. Responses to Comments

- The comment neither identifies a deficiency in the DEIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.
- R8-6 The comment states that the Proposed Project should improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (including SRTS) SMMUSD will support and integrate with the campus. Please see response to comment R7-5.
- R8-7 The comment states that Transportation Demand Management strategies for teachers and staff should be implemented to mitigate future driving demand. Please see response to comment R7-6.

## 2. Responses to Comments

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## 2. Responses to Comments

### Comment R9 Brian Sweeney

**From:** Brian Sweeney [REDACTED]  
**Sent:** Sunday, December 10, 2023 8:36 PM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Re: Grant Elementary School parking/arrival court proposal

### Comment Letter R9

Dear Mr. Upton:

Grant Elementary is a neighborhood school where most students are still seen arriving by walking, rolling, or transit, not by car. The expansion of automobile infrastructure on the school campus, as proposed in the Grant Elementary Master Plan Environmental Impact Report (EIR), will have long-term negative impacts on how Grant students and staff travel to/from school, and on the neighborhood as a whole. It will result in more traffic congestion and pollution, reduce the number of students who take non-auto modes to/from Grant, and make it less safe to travel around the neighborhood.

R9-1

The EIR proposes to increase parking capacity on campus by 50% and add an "arrival court" in an arbitrary manner unrelated to stated desired outcomes. The proposal also stands contrary to SMMUSD's environmental and sustainability goals. Proceeding with this proposal without providing mitigation measures will cause us to regress away from our quest to reach our climate goals while worsening congestion in the area. Enhanced automobile access is not a Project Objective; does not support student learning or safety; is not in any way justified by the EIR; and is a poor use of SMMUSD funds.

R9-2

I request that the Final EIR incorporates the mitigation measures below, while aligning with the SMMUSD Sustainability Plan as well as community and outside stakeholder input.

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Most critical, expand the main Pearl St drop off/pick up area to meet current accessibility needs for cargo bikes and other micromobility modes and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by repurposing the Pearl St staff/visitor parking lot.

R9-3

2. Reduce the amount of any additional automobile parking to net zero (e.g. only replace what was lost in one area with the same number of spaces in another area to keep total spaces at 62).

R9-4

3. Improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate with the campus.

R9-5

4. To mitigate future driving demand, implement meaningful Transportation Demand Management strategies for teachers and staff as referenced in your District Sustainability Plan and recommended by Caltrans in their Scoping EIR letter to you.

R9-6

Thank you!

**Brian Sweeney**  
[REDACTED]

## 2. Responses to Comments

### R9. Response to Comment from Brian Sweeney, provided via email on December 10, 2023

- R9-1 This comment states that most Grant ES students arrive by walking, rolling, or transit, and not by car; thus, the expansion of automobile infrastructure on the campus would have long-term negative impacts resulting from increased traffic congestion and pollution. They state that the Proposed Project would reduce the number of students who walk or bike to school and result in unsafe conditions for pedestrians and bicyclists in the neighborhood. Please see response to comment R7-1 for further information regarding traffic congestion. See R7-3 for further information on why additional parking would not increase VMT.
- R9-2 The comment states that the Proposed Project would increase parking capacity on campus by 50 percent and add an arrival court in an arbitrary manner, which are contrary to SMMUSD's environmental and sustainability goals. The commenter also states that increased parking is not an objective of the Proposed Project. Please see response to comment R7-2 for further information regarding student capacity and the proposed arrival court. See R7-3 for further information on why additional parking would not increase VMT.
- R9-3 This comment states that the Proposed Project should incorporate five suggested mitigation measures. Each of those recommendations and a response for each are provided below.
- Evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation. Please see response to comment R7-3.
- R9-4 This comment states that parking at the Grant ES campus should be reduced to net zero, only replace what was lost in one area with the same number of spaces in another area. Please comment response R7-4.
- R9-5 The comment states that the Proposed Project should improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (including SRTS) SMMUSD will support and integrate with the campus. Please see response to comment R7-5.
- R9-6 The comment states that Transportation Demand Management strategies for teachers and staff should be implemented to mitigate future driving demand. Please see response to comment R7-6.

## 2. Responses to Comments

### Comment R10 Jacob Wasserman

**From:** Jacob Wasserman [REDACTED]  
**Sent:** Monday, December 11, 2023 9:08 AM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Grant EIR Comments

### Comment Letter R10

From: Jacob Wasserman  
Santa Monica resident and parent

Dear Mr. Upton:

Grant Elementary is a neighborhood school where most students are still seen arriving by walking, rolling, or transit, not by car. The expansion of automobile infrastructure on the school campus, as proposed in the Grant Elementary Master Plan Environmental Impact Report (EIR), will have long-term negative impacts on how Grant students and staff travel to/from school and on the neighborhood as a whole. It will result in more traffic congestion and pollution (particularly harmful to children), reduce the number of students who take non-automobile modes to/from Grant, and make it less safe to travel around the neighborhood.

R10-1

The EIR proposes to increase parking capacity on campus by 50 percent and add an "arrival court" in an arbitrary manner unrelated to stated desired outcomes. The proposal also stands contrary to SMMUSD's environmental and sustainability goals. Proceeding with this proposal without providing mitigation measures will cause us to regress away from our quest to reach our climate goals, while worsening congestion in the area. Enhanced automobile access is not a Project Objective, does not support student learning or safety, is not in any way justified by the EIR, and is a poor use of SMMUSD funds.

R10-2

I request that the Final EIR incorporates the mitigation measures below, while aligning with the SMMUSD Sustainability Plan, as well as community and outside stakeholder input.

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Most critical, expand the main Pearl Street drop-off/pick-up area to meet current accessibility needs for cargo bikes and other micromobility modes and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by repurposing the Pearl Street staff/visitor parking lot.

R10-3

2. Reduce the amount of any additional automobile parking to net-zero (i.e., only replace what was lost in one area with the same number of spaces in another area, to keep total spaces at 62 (or fewer)).

R10-4

3. Improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate with the campus.

R10-5

4. To mitigate future driving demand, implement meaningful Transportation Demand Management strategies for teachers and staff as referenced in your District Sustainability Plan and recommended by Caltrans in their Scoping EIR letter to you.

R10-6

Thank you!

## 2. Responses to Comments

### **R10. Response to Comment from Jacon Wasserman, provided via email on December 11, 2023**

- R10-1 This comment states that most Grant ES students arrive by walking, rolling, or transit, and not by car; thus, the expansion of automobile infrastructure on the campus would have long-term negative impacts resulting from increased traffic congestion and pollution. They state that the Proposed Project would reduce the number of students who walk or bike to school and result in unsafe conditions for pedestrians and bicyclists in the neighborhood. Please see response to comment R7-1 for further information regarding traffic congestion. See R7-3 for further information on why additional parking would not increase VMT.
- R10-2 The comment states that the Proposed Project would increase parking capacity on campus by 50 percent and add an arrival court in an arbitrary manner, which are contrary to SMMUSD's environmental and sustainability goals. The commenter also states that increased parking is not an objective of the Proposed Project. Please see response to comment R7-2 for further information regarding student capacity and the proposed arrival court. See R7-3 for further information on why additional parking would not increase VMT.
- R10-3 This comment states that the Proposed Project should incorporate five suggested mitigation measures. Each of those recommendations and a response for each are provided below.
- Evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation. Please see response to comment R7-3.
- R10-4 This comment states that parking at the Grant ES campus should be reduced to net zero, only replace what was lost in one area with the same number of spaces in another area. Please comment response R7-4.
- R10-5 The comment states that the Proposed Project should improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (including SRTS) SMMUSD will support and integrate with the campus. Please see response to comment R7-5.
- R10-6 The comment states that Transportation Demand Management strategies for teachers and staff should be implemented to mitigate future driving demand. Please see response to comment R7-6.

## 2. Responses to Comments

### Comment R11 Sam Shapiro-Kline

**From:** Sam Shapiro-Kline [REDACTED]  
**Sent:** Tuesday, December 12, 2023 4:20 PM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Grant Elementary EIR

Comment Letter R11

From:

Sam Shapiro-Kline  
90403  
[REDACTED]

Dear Mr. Upton:

Grant Elementary is a neighborhood school where most students are still seen arriving by walking, rolling, or transit, not by car. The expansion of automobile infrastructure on the school campus, as proposed in the Grant Elementary Master Plan Environmental Impact Report (EIR), will have long-term negative impacts on how Grant students and staff travel to/from school, and on the neighborhood as a whole. It will result in more traffic congestion and pollution, reduce the number of students who take non-auto modes to/from Grant, and make it less safe to travel around the neighborhood.

R11-1

The EIR proposes to increase parking capacity on campus by 50% and add an “arrival court” in an arbitrary manner unrelated to stated desired outcomes. The proposal also stands contrary to SMMUSD’s environmental and sustainability goals. Proceeding with this proposal without providing mitigation measures will cause us to regress away from our quest to reach our climate goals while worsening congestion in the area. Enhanced automobile access is not a Project Objective; does not support student learning or safety; is not in any way justified by the EIR; and is a poor use of SMMUSD funds.

R11-2

I request that the Final EIR incorporates the mitigation measures below, while aligning with the SMMUSD Sustainability Plan as well as community and outside stakeholder input.

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Most critical, expand the main Pearl St drop off/pick up area to meet current accessibility needs for cargo bikes and other micromobility modes and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by repurposing the Pearl St staff/visitor parking lot.

R11-3

2. Reduce the amount of any additional automobile parking to net zero (e.g. on replace what was lost in one area with the same number of spaces in another area to keep total spaces at 62).

R11-4

3. Improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate with the campus.

R11-5

4. To mitigate future driving demand, implement meaningful Transportation Demand Management strategies for teachers and staff as referenced in your District Sustainability Plan and recommended by Caltrans in their Scoping EIR letter to you.

R11-6

Thank you!  
Sam

## 2. Responses to Comments

### **R11. Response to Comment from Sam Shapiro-Kline, provided via email on December 12, 2023**

- R11-1 This comment states that most Grant ES students arrive by walking, rolling, or transit, and not by car; thus, the expansion of automobile infrastructure on the campus would have long-term negative impacts resulting from increased traffic congestion and pollution. They state that the Proposed Project would reduce the number of students who walk or bike to school and result in unsafe conditions for pedestrians and bicyclists in the neighborhood. Please see response to comment R7-1 for further information regarding traffic congestion. See R7-3 for further information on why additional parking would not increase VMT.
- R11-2 The comment states that the Proposed Project would increase parking capacity on campus by 50 percent and add an arrival court in an arbitrary manner, which are contrary to SMMUSD's environmental and sustainability goals. The commenter also states that increased parking is not an objective of the Proposed Project. Please see response to comment R7-2 for further information regarding student capacity and the proposed arrival court. See R7-3 for further information on why additional parking would not increase VMT.
- R11-3 This comment states that the Proposed Project should incorporate five suggested mitigation measures. Each of those recommendations and a response for each are provided below.
- Evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation. Please see response to comment R7-3.
- R11-4 This comment states that parking at the Grant ES campus should be reduced to net zero, only replace what was lost in one area with the same number of spaces in another area. Please comment response R7-4.
- R11-5 The comment states that the Proposed Project should improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (including SRTS) SMMUSD will support and integrate with the campus. Please see response to comment R7-5.
- R11-6 The comment states that Transportation Demand Management strategies for teachers and staff should be implemented to mitigate future driving demand. Please see response to comment R7-6.

## 2. Responses to Comments

### Comment R12 Connor Webb

**From:** Connor Webb [REDACTED]  
**Sent:** Wednesday, December 13, 2023 10:21 AM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Grant Elementary EIR

From:

Connor Webb  
[REDACTED]

Dear Mr. Upton:

Grant Elementary students are largely arriving on foot, bicycle, or transit, not by car. The Grant Elementary Master Plan Environmental Impact Report (EIR) expands car infrastructure on the school campus and will have long-term negative impacts on how Grant students and staff travel to/from school, and around the neighborhood in general. We should be encourage these sustainable and healthy modes of getting to school, not making it more difficult. The current plan will result in more traffic congestion and pollution, reduce the number of students who take non-auto modes, and make the neighborhood less safe. R12-1

The EIR proposes to increase parking capacity on campus by 50% and add an “arrival court” in an arbitrary manner unrelated to stated desired outcomes. The proposal also stands contrary to SMMUSD’s environmental and sustainability goals. Proceeding with this proposal without providing mitigation measures will cause us to regress away from our quest to reach our climate goals while worsening congestion in the area. Additionally, discouraging alternative modes of travel will negatively impact the health of our children. In the US, cars and guns are in a close race for the most common cause of death to our youth. I would certainly hope you would not encourage more guns in and around the school, so why are you planning to bring more cars into the vicinity of the school? Enhanced automobile access is not a Project Objective; does not support student learning or safety; is not in any way justified by the EIR; and is a poor use of SMMUSD funds. R12-2

I request that the Final EIR incorporates the mitigation measures below, while aligning with the SMMUSD Sustainability Plan as well as community and outside stakeholder input:

1. Evaluate drop-off and pick-up zones and expand these zones for those not using automobiles. Critically, expand the Pearl St drop off/pick up area to meet current accessibility needs for cargo bikes and other micromobility modes and to compensate for the loss of green space due to the Phase 1 expansion of Early Education Classrooms. This can most readily be done by repurposing the Pearl St staff/visitor parking lot. R12-3
2. Reduce the amount of any additional automobile parking to net zero (e.g. only replace what was lost in one area with the same number of spaces in another area to keep total spaces at 62). R12-4
3. Improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (such as the existing Safe Routes to School Plan) SMMUSD will support and integrate with the campus. R12-5
4. To mitigate future driving demand, implement meaningful Transportation Demand Management strategies for teachers and staff as referenced in your District Sustainability Plan and recommended by Caltrans in their Scoping EIR letter to you. R12-6

Thank you,  
Connor Webb  
Santa Monica Resident

## 2. Responses to Comments

### **R12. Response to Comment from Connor Webb, provided via email on December 13, 2023**

- R12-1 This comment states that most Grant ES students arrive by walking, rolling, or transit, and not by car; thus, the expansion of automobile infrastructure on the campus would have long-term negative impacts resulting from increased traffic congestion and pollution. They state that the Proposed Project would reduce the number of students who walk or bike to school and result in unsafe conditions for pedestrians and bicyclists in the neighborhood. Please see response to comment R7-1 for further information regarding traffic congestion. See R7-3 for further information on why additional parking would not increase VMT.
- R12-2 The comment states that the Proposed Project would increase parking capacity on campus by 50 percent and add an arrival court in an arbitrary manner, which are contrary to SMMUSD's environmental and sustainability goals. The commenter also states that increased parking is not an objective of the Proposed Project. Please see response to comment R7-2 for further information regarding student capacity and the proposed arrival court. See R7-3 for further information on why additional parking would not increase VMT.
- R12-3 This comment states that the Proposed Project should incorporate five suggested mitigation measures. Each of those recommendations and a response for each are provided below.
- Evaluate drop-off and pick-up zones and expand the zones for pedestrians and bicyclists that are not using automobiles, and repurposing the Pearl Street parking lot to meet current accessibility needs for cargo bikes and other micro-mobility modes of transportation. Please see response to comment R7-3.
- R12-4 This comment states that parking at the Grant ES campus should be reduced to net zero, only replace what was lost in one area with the same number of spaces in another area. Please comment response R7-4.
- R12-5 The comment states that the Proposed Project should improve connections from schools to existing active transportation and transit infrastructure by specifying which city measures (including SRTS) SMMUSD will support and integrate with the campus. Please see response to comment R7-5.
- R12-6 The comment states that Transportation Demand Management strategies for teachers and staff should be implemented to mitigate future driving demand. Please see response to comment R7-6.

## 2. Responses to Comments

### Comment R13 Allon Percus

**From:** Allon Percus [REDACTED]  
**Sent:** Wednesday, December 13, 2023 2:05 PM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Grant Elementary draft EIR: comments on transportation plan

### Comment Letter R13

Dear Mr. Upton,

As a Santa Monica resident and homeowner, I am writing to express my **strong opposition** to the transportation plan articulated in the Draft EIR for Grant Elementary. By adding a new vehicle drop-off area and significantly expanding staff parking at the school, the plan rewards traveling to school by car. This is completely at odds with the vision of both the City of Santa Monica and the School Board, both of which aim at discouraging car trips in favor of more sustainable and livable forms of transportation like walking and biking.

R13-1

The Draft EIR claims that the majority of students currently arrive at school by car. There is no evidence backing up this claim, and even if it were true, it would by no means justify encouraging car use further. That is not what Santa Monica wants or needs.

R13-2

I urge you to work with the Grant Elementary community and Santa Monica Families for Safe Streets to discard the current car-centric proposal in favor of a balanced commonsense plan that enhances drop-off space for bicycles and pedestrians. Automobile prioritization has failed us as a community – to say nothing of its catastrophic climate effects. Let’s instead work on promoting safe and healthy means to get to and from school.

R13-3

Thank you for your consideration.

Sincerely,

Allon Percus  
[REDACTED]  
[REDACTED]

## 2. Responses to Comments

### **R13. Response to Comment from Allon Percus, provided via email on December 13, 2023**

R13-1. The commenter states the opposition to the transportation plan included in the DEIR which would add a new drop off area and expand the parking lots on the Grant ES campus.

The Proposed Project involves a school modernization and is a compatible use with the existing school uses. The Proposed Project would maintain the DOPU area along Pearl Street in front of the campus (no new vehicle drop-off area is proposed). Provision of the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24<sup>th</sup> Street by providing additional space for vehicles to enter the new parking lots on either side of the campus and exit back onto 24<sup>th</sup> Street.

The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in an increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. See R7-3 for further information on why additional parking would not increase VMT. The Proposed Project would continue to serve the local community residents and would not construct or modify the surrounding circulation network, including roads and pedestrian facilities. The Proposed Project would not alter attendance boundaries resulting in increased walking distances.

Therefore, the DEIR adequately analyzes all transportation impacts of the Proposed Project, and no revisions are necessary.

R13-2 The commenter states that the DEIR is incorrect in claiming that the majority of students currently arrive at school by car.

As stated on page 5.10-12 and Appendix K, of the DEIR, field observations on a typical school day were conducted on Tuesday, May 3, 2022, which identified existing traffic patterns, access points, drop off/pick up operations, pedestrian/vehicular conflict areas, and pedestrian circulation. The method of school transportation for students can vary any given day and is highly variable. The Proposed Project ensures accessibility and safety for all modes of transportation, and properly evaluates environmental impacts associated with the proposed improvements.

Therefore, the DEIR adequately analyzes all transportation impacts of the Proposed Project, including drop off/pick up operations at Grant ES, and no revisions are necessary.

R13-3 The comment states that the District should discard the current car-centric proposal in favor of a balanced commonsense plan that enhances drop-off space for bicycles and pedestrians.

## 2. Responses to Comments

As stated on page 5.10-16 of the DEIR, the Proposed Project includes improvements to vehicular and pedestrian safety access points that would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and would meet the intent of SRTS strategies identified in SCAG's Active Transportation Technical Report:

- New bike racks that would accommodate at least 10 percent of regular building occupants with a goal to reach 20 percent capacity by 2030, consistent with the Districtwide Plan for Sustainability.
- High-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance.
- Signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus would be provided for any new pedestrian paths that would cross along Pearl Street.

Therefore, the DEIR adequately analyzes all transportation impacts of the Proposed Project, and no revisions are necessary. The SMMUSD Board of Education will consider all comments prior to the finalization of this Project.

## 2. Responses to Comments

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## 2. Responses to Comments

### Comment R14 Catherine Kollros

**From:** Catharine Kollros [REDACTED]  
**Sent:** Wednesday, December 13, 2023 12:54 PM  
**To:** Upton, Carey <cupton@smmusd.org>  
**Subject:** Grant Elementary School Campus Plan Project

### Comment Letter R14

Please accept this written statement in response to the proposed campus plan for Grant Elementary School. Thank you.

Because of Grant's closed campus, the grand entrance within school grounds is closed to parents during drop-off and pick-up. At these times, the area outside of the school gate is very congested, and there is inadequate space for PTA activities and events where the students, parents, and community come together. I am very concerned that the new plan will take most of this precious space into the school grounds without creating an open and safe environment for students entering and exiting the school, and for community interaction. Many students are dropped off by cargo bike, and the grassy area to the west of the school entrance is used informally as a bike loading zone. With this space taken away, bike traffic, pedestrian traffic, and community-interfacing activities will be pushed dangerously streetwards into narrow parkways, putting students and their families at risk.

Despite the new plan taking and not replacing this front-of-school space that is used by a high percentage of the community, the parking lot adjacent to the school entrance on the East is preserved in the plan. The safety hazard this lot currently creates for students has been recognized by school leadership in emails to the community about drop-off and pick-up procedures. This danger will only increase as the entry corridor to the school is effectively narrowed from the West, potentially pushing pedestrians into the only remaining open space — the parking lot to the East. The campus plan proposes expanding the rear parking lots to bring the total parking capacity from 62 to 94 stalls, a gain of 34%. Nothing in the plan justifies needing such a large increase in parking capacity. The 14 stalls in the front lot could be removed and still leave a total of 80 stalls — a 29% increase over the current parking capacity.

As it stands, the plan will decrease space for bike and pedestrian traffic in front of the school, pushing students into closer proximity with car traffic. Removing the parking lot at the front entrance to the school, and replacing it with a bike parking/loading zone and pedestrian plaza would make the school entrance significantly safer and more welcoming for students and families, while still leaving a very large increase in parking capacity. We should use the opportunity of campus development to increase, not decrease, the safety of our students.

Catharine Kollros  
Current Grant Parent

R14-1

## 2. Responses to Comments

### R14. Response to Comment from Catherine Kollros, provided via email on December 14, 2023

R14-1 The comment expresses concern that the front of the school is too congested and implementation of the proposed Project would not allow for adequate space for PTA activities and events where the students, caregivers, and community come together. Additionally, the commenter states that several students are dropped off by bicycle, and implementation of the Proposed Project would remove the bicycle loading zone located north of Building A.

The commenter also suggests that removing the parking lot at the front entrance to the school, and replacing it with a bike parking/loading zone and pedestrian plaza would make the school entrance significantly safer and more welcoming for students and families.

As shown in Figures 3-7a through 3-7c, *Proposed Project Site Plan*, of the DEIR, the Proposed Project would not change the existing grass area located at the front of the campus, along Pearl Street. Additionally, in response to comments received during the public review period of the DEIR, the District will consider a design option for the administrative parking lot located at the northeast corner of the school, as described in Chapter 3, *Revisions to the DEIR*, of this FEIR. The design option would remove all parking spaces from the existing parking lot during the Phase 3 of the Proposed Project, and implement a new community plaza, which would be accessible only to pedestrians and bicyclists via 24<sup>th</sup> Court (see Figure 3-9, *Design Option, Pearl Street Community Plaza*, of the FEIR). This would result in a total of 80 parking spaces at Grant ES (an increase of 18 from existing conditions). The reconfigured parking lots are intended to better accommodate existing operational needs, including staff parking and afterschool needs, and to improve safety conditions for pedestrian access (minimize queuing and street parking). The increase in 18 parking spaces is intended to better serve the existing employees and visitors on campus and would not result in a significant increase in vehicle trips, nor prevent those students who use alternative means of transportation from accessing the school. See R7-3 for further information on why additional parking would not increase VMT. The proposed design option does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project.

## 3. Revisions to the DEIR

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### 3.1 INTRODUCTION

This section contains revisions to the DEIR based on (1) additional or revised information required to prepare a response to a specific comment, (2) applicable updated information that was not available at the time of DEIR publication, and/or (3) typographical errors. This section also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements in the DEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the DEIR. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in double underlined text to signify additions.

### 3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR.

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Page 1-13, Table 1-1, *Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation*.  
The following text has been updated in response to Comments on the DEIR.

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#### HAZ-2

The District will retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments to conduct soil sampling. The soil sampling will be conducted prior to any disturbance of the area(s) suspected of potential contamination to evaluate shallow soil conditions with respect to lead-based paint residues from on-site structures built prior to 1990 ~~and chemicals commonly used at dry cleaners, including chlorinated solvents, due to historical uses at nearby properties.~~ If the soil sampling identifies the presence of contaminated soils, the contractor shall prepare and implement a contaminated soils removal action workplan for removal of affected soils on-site. ~~Affected soils shall be excavated and disposed of off-campus at a landfill permitted to accept such waste, and~~ Treatment of contaminated soils shall be conducted in a manner consistent with recommendations in the removal action work plan and the campus shall be cleaned to an acceptable level per DTSC requirements.

After the District confirms that the affected soils have been removed through the collection of soil samples in the excavation areas, ~~the excavation shall be backfilled and compacted with clean soil, and~~ the contractor will prepare a Completion Report that documents the removal and presents analytical results for the confirmation samples.

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The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 3-30, Section 3.5.3, *Site Access*. The following text has been updated in response to Comments on the DEIR.

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#### **Vehicular Access**

Currently, campus access for vehicular drop-off and pick-up for ~~TK and K~~ students is provided from Pearl Street and along 24<sup>th</sup> Street at the front of campus. The drop-off and pick-up area at the southern end of the campus ~~is used by students from 1<sup>st</sup> to 5<sup>th</sup> grade and~~ is accessed primarily via Ocean Park Boulevard. Drop-off and pick-up at this location typically progresses counterclockwise in the existing parking lot.

The Proposed Project would maintain the drop-off and pick-up area at the front of the campus along Pearl Street. The Proposed Project would include a new arrival court at the southern end of the campus, adjacent to the reconfigured playfield, that would connect the two new parking lots to 24<sup>th</sup> Street and would ~~also~~ be accessible to pedestrians and bicyclists only. The new arrival court would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street, to avoid having to cross vehicular circulation within the new parking lots. The arrival court would not be used to for vehicular drop off/pick up, and the two proposed lots at the southern end of the campus would provide additional space for vehicles to enter through the new parking lots on either side of the campus and exit back onto 24<sup>th</sup> Street. All vehicles entering via 24<sup>th</sup> Street for DOPU operations can be accommodated on-site within the arrival court, eliminating queuing and/or on-street parking on 24<sup>th</sup> Street.

#### **Pedestrian Access**

Pedestrian paths would be delineated to connect the sidewalk on Pearl Street to the entrance of the campus. Any walkways through the Pearl Street area would continue to maintain pedestrian treatments for added safety, including clearly marked crosswalks, stop signs, and crossing guards.

The Proposed Project would include an arrival court that connects the new south parking lots to 24<sup>th</sup> Street at the southeast and southwest corners of campus. The arrival court would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street, to avoid having to cross vehicular circulation within the new parking lots. a safer drop off and pick up area for students that are dropped off or picked up at the southern end of the Campus, since parking for school staff would be separated from daily drop-off and pick-up operations, and students who walk or bike to campus and arrive from 24<sup>th</sup> Street would have access to the campus from the south without having to cross vehicular circulation.

### 3. Revisions to the DEIR

All classrooms at ground and second floors would be connected via covered outdoor walkways on the internal, campus-facing side of the east and west wings of the school buildings. Covered outdoor circulation would connect the east and west wings across the campus in three locations.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 3-33, Section 3.5.3, *Site Access*. The following text has been updated in response to Comments on the DEIR.

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#### **Parking**

A visitor and administrative parking lot with 14 parking spaces is in front of the auditorium (Building E) near the main entrance and at the northeast corner of campus facing Pearl Street. An L-shaped staff parking lot with 48 parking spaces is at the southeast corner of the campus, adjacent to the basketball courts, and is accessed from 24<sup>th</sup> Street. Vehicular access to the campus would remain along Pearl Street and 24<sup>th</sup> Street. The existing parking lot in the northeastern portion of the campus would continue to be used for visitor and administrative parking.

The existing L-shaped parking lot in the southeast portion of the campus would be reconfigured into two new parking lots at the southeast and southwest corners of the campus. Each parking lot would include approximately 40 parking stalls and would provide staff and after-hours/weekend community parking for joint use purposes (e.g., soccer games). Overall, the Proposed Project would increase parking on the existing campus from 62 to 94 parking spaces (or 80 parking spaces with the implementation of the Design Option, Pearl Street Community Plaza) and reduce the need for on-street parking.

#### **Emergency Access**

Emergency vehicle access would continue to be provided on all four sides of campus—Pearl Street, 24<sup>th</sup> Court, 24<sup>th</sup> Street, and Pearl Place. Additionally, emergency access would be provided from the arrival court and around the field and playground areas on the south side of campus.

#### **Design Option - Pearl Street Community Plaza**

The Proposed Project includes a design option that would repurpose the administrative parking lot located at the northeast corner of the Grant ES campus into a community plaza, as shown in Figure 3-9, *Design Option, Pearl Street Community Plaza*. Implementation of the design option would eliminate all 14 parking spaces on the existing parking lot during Phase 3 of the Proposed Project, reducing overall parking on the campus from 94 to 80 parking spaces. The proposed community plaza would serve as drop-off and pick-up area and would be accessible to pedestrians and bicyclists only, via 24<sup>th</sup> Court.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of

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an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 5.7-18, Section 5.7.4, *Mitigation Measures*. The following text has been updated in response to Comments on the DEIR.

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**HAZ-2** The District will retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments to conduct soil sampling. The soil sampling will be conducted prior to any disturbance of the area(s) suspected of potential contamination to evaluate shallow soil conditions with respect to lead-based paint residues from on-site structures built prior to 1990 ~~and chemicals commonly used at dry cleaners, including chlorinated solvents, due to historical uses at nearby properties.~~ If the soil sampling identifies the presence of contaminated soils, the contractor shall prepare and implement a contaminated soils removal action workplan for removal of affected soils on-site. ~~Affected soils shall be excavated and disposed of off campus at a landfill permitted to accept such waste, and~~ Treatment of contaminated soils shall be conducted in a manner consistent with recommendations in the removal action work plan and the campus shall be cleaned to an acceptable level per DTSC requirements.

After the District confirms that the affected soils have been removed through the collection of soil samples in the excavation areas, ~~the excavation shall be backfilled and compacted with clean soil, and~~ the contractor will prepare a Completion Report that documents the removal and presents analytical results for the confirmation samples.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 5.10-7, Section 5.10.1.2, *Existing Conditions*. The following text has been updated in response to Comments on the DEIR.

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#### Existing School Operations and Circulation

Vehicular access to the campus (for staff and visitor parking) is provided via two surface parking lots. The parking lot at the northeastern portion of the campus, at the intersection of 24<sup>th</sup> Court and Pearl Street, is used for visitor and administrative parking. Additionally, the parking lot at the southeastern portion of the campus, near 24<sup>th</sup> Court and 24<sup>th</sup> Street, is used for staff parking and student drop-off and pick-up. Pedestrian access to the campus is provided via Pearl Street and 24<sup>th</sup> Street (see Figure 5.10-1, *Existing Vehicular/Pedestrian*

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*Circulation*). Deliveries occur off the 24<sup>th</sup> Court (alley) adjacent to the kitchen along with trash and recycle pick-up at a service yard level with the alley. Bicycle parking is located on-campus fronting Pearl Street.

All grades at the school begin at 8:00 a.m., with transitional kindergarten (TK) and kindergarten (K) dismissed at 1:45 p.m., preschool at 2:30 p.m., and Grades 1 through 5 between 2:40 p.m. and 3:00 p.m., except Wednesdays, when preschool and TK-K are dismissed at 1:00 p.m. and the remaining students between 1:15 p.m. and 1:30 p.m.

#### *Student Pick-Up/Drop-Off*

The current drop-off/pick-up (DOPU) operations occur primarily at two locations:

- **Pearl Street DOPU.** The south side of Pearl Street (curbside) between 24<sup>th</sup> Court and Cloverfield Boulevard. ~~The Pearl Street DOPU area is limited to preschool and TK-K students.~~ Vehicles queue on the south (eastbound) side of Pearl Street between Cloverfield Boulevard and 24<sup>th</sup> Court during DOPU hours.
- **24<sup>th</sup> Street DOPU.** 24<sup>th</sup> Street at the southern end of the school. ~~The 24<sup>th</sup> Street DOPU is utilized by grades 1 through 5 students and is accessed primarily via Ocean Park Boulevard.~~ The two-lane collector street ends at the gated entrance into the southern portion of the campus. On-street parking is allowed on either side of 24<sup>th</sup> Street. Vehicles enter the campus driveway and follow the counterclockwise vehicular pattern in the existing staff parking lot and exit back onto 24<sup>th</sup> Street.
- **Pedestrian Access.** Students who walk or bike to school enter the campus at the northern end. Marked crosswalks are on the north and east legs of the 24<sup>th</sup> Street/Pearl Street intersection. Marked crosswalks are provided on all legs of Pearl Street's intersections with Cloverfield Boulevard and 25<sup>th</sup> Street. To facilitate safe pedestrian crossings from the neighborhood to the school, crossing guards are at all three intersections in the morning and afternoon.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 5.10-11, Section 5.10.3, *Environmental Impacts*. The following text has been updated in response to Comments on the DEIR.

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#### **Proposed Project Design Features**

The Proposed Project would include features that would enhance pedestrian and vehicular safety:

- **PDF T-1: Arrival Court.** An arrival court that connects south parking lots to 24<sup>th</sup> Street would provide safe access to the campus for students who walk or bike to campus, and arrive from 24<sup>th</sup> Street, to avoid having to cross vehicular circulation within the new parking lots. The arrival court would not be used to for vehicular drop off/pick up. ~~be provided and would accommodate vehicular circulation to parking lots~~

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~~at the southeast and southwest corners of campus. The arrival court would provide a safer DOPU area for students that are dropped off or picked up at the southern end of the campus, since parking for school staff would be separated from daily DOPU operations, and students who walk or bike to campus and arrive from 24th Street would have access to the campus from the south without having to cross vehicular circulation.~~

- **PDF T-2: Pedestrian Treatments.** Pedestrian treatments such as high-visibility striping on crosswalks would be provided at the Pearl Street sidewalk, as well as signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the campus.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

Page 5.10-14, Section 5.10.3, *Environmental Impacts*. The following text has been updated in response to Comments on the DEIR.

**Table 5.10-3 Consistency with Goals and Policies Addressing the Circulation System**

| Circulation Element  |   |
|--|---|
| <b>Policy T8.4.</b> Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.  | <b>Consistent.</b> The Proposed Project would maintain the existing early education drop-off/pick-up area along Pearl Street and implement a new arrival court at the southern end of the campus from 24 <sup>th</sup> Street, which would also be accessible to pedestrians <u>and bicyclists only</u> . This would improve accessibility for pedestrians access the campus when compared to the existing configuration of the campus.   |
| <b>Goal T24.</b> Provide adequate parking availability for commuters, visitors and shoppers throughout the day.  | <b>Consistent.</b> The Proposed Project would feature two new parking lots at the southeast and southwest corners of the campus which would replace the existing L-shaped parking lot in the southeast portion of campus. This would increase the total number of parking spaces on the project site from 62 to 94 stalls, <u>(or 80 stalls with the implementation of the Design Option, Pearl Street Community Plaza)</u> which would serve existing demand and alleviate parking on surrounding local streets.   |
| <b>Policy T25.1.</b> Require adequate on-site loading areas for child care centers, healthcare offices and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas. | <b>Consistent.</b> <del>The Proposed Project would construct an arrival court that connects the two new parking lots on the southern portion of the campus to accommodate DOPU for Grades 1 through 5 and eliminate queuing and parking on 24<sup>th</sup> Street.</del> The two new proposed parking lots would also provide approximately 40 stalls each, which, in addition to the 14 stalls from the north parking lot, would increase onsite parking from 62 to 94 stalls <u>(or 80 stalls with the implementation of the Design Option, Pearl Street Community Plaza)</u> . |
| <b>Policy T25.2.</b> Require that parking be accessed only from alleys, where alley access is available.   | <b>Consistent.</b> Upon completion of the Proposed Project, permanent faculty/visitor parking would not change from existing conditions.  |

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The Proposed Project would not adversely affect any existing or planned transit, bicycle, or pedestrian facilities. Additionally, because the Proposed Project would not increase enrollment or capacity, there would not be an increase in demand for these facilities. The Proposed Project would not alter the current travel patterns or pedestrian activity already experienced and planned for under existing conditions.

#### **Santa Monica Municipal Code**

The Proposed Project would comply with the standards and requirements in the SMMC. Specifically, the Proposed Project would comply with Chapter 9.28, Parking, Loading, and Circulation, with reconfiguration and implementation of new parking lots on the Grant ES campus. Phase 2 of the Proposed Project would include the removal of the existing parking lot and construction of two new parking lots, which would provide approximately 40 parking spaces each. The total number of parking stalls on the campus would increase from 62 to 94 stalls (or 80 stalls with the implementation of the Design Option, Pearl Street Community Plaza), reducing the need for visitors and staff to use on-street parking. These parking lots would also provide after-hours/weekend community parking for joint-use purposes (i.e., soccer games). Arrivals and departures from these lots onto 24<sup>th</sup> Street would occur outside of the peak traffic hours.

An arrival court that connects the two proposed parking lots on the southern portion of campus to 24<sup>th</sup> Street would be provided to improve DOPU operations for grades 1 through 5. The arrival court would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street, to avoid having to cross vehicular circulation within the new parking lots. ~~provide a safer DOPU area for students that are dropped off or picked up at the southern end of the campus, since parking for school staff would be separated from daily DOPU operations, and students who walk or bike to campus and arrive from 24<sup>th</sup> Street would have access to the campus from the south without having to cross vehicular circulation.~~ Therefore, the Proposed Project would not conflict with the SMMC such that a significant adverse impact to transportation would occur.

#### **Pedestrian Action Plan**

The Proposed Project would maintain the existing the early education DOPU area along Pearl Street, and would construct arrival court that connects the new south parking lots to 24th Street, which would ~~also~~ be accessible to pedestrians and bicyclists only. As described below, the Proposed Project would not conflict with the Pedestrian Action Plan.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 5.10-17, Section 5.10.3, *Environmental Impacts*. The following text has been updated in response to Comments on the DEIR.

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These proposed improvements would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the “Street Design/Engineering Strategies”

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section of the 2021 Safe Routes Partnership Guidelines (SRTS Partnership 2021). The City is developing local transportation funds to implement the proposed improvements based on the SRTS walking audits conducted in 2018 as described above (City of Santa Monica 2023). The proposed improvements anticipated within the vicinity of Grant ES are listed in Section 5.10.1.1 under “Safe Routes to School.” Additionally, the District may implement the Design Option, Pearl Street Community Plaza, in which all 14 parking spaces on the existing parking lot located along Pearl Street would be eliminated during Phase 3 of the Proposed Project, reducing overall parking on the campus from 94 to 80 parking spaces. The existing parking lot would be repurposed into a community plaza that would serve as drop-off and pick-up area and would be accessible to pedestrians and bicyclists only, via 24<sup>th</sup> Court. Once funding is secured, the City will coordinate with the District to implement these improvements.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page 5.10-19, Section 5.10.3, *Environmental Impacts*. The following text has been updated in response to Comments on the DEIR.

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#### Operation

The Proposed Project involves a school modernization and is a compatible use with the existing school uses. The Proposed Project would maintain the DOPU area along Pearl Street in front of the campus. The existing parking lot in the northeastern portion of the campus, with a total of 14 parking spaces, would remain and would continue to be used for visitor and administrative parking. However, the District may implement the Design Option, Pearl Street Community Plaza, in which all 14 parking spaces on the existing parking lot located along Pearl Street would be eliminated during Phase 3 of the Proposed Project, reducing overall parking on the campus from 94 to 80 parking spaces. The existing parking lot would be repurposed into a community plaza that would serve as drop-off and pick-up area and would be accessible to pedestrians and bicyclists only, via 24<sup>th</sup> Court.

The existing egress driveway at 24<sup>th</sup> Street would remain for grades 1 through 5 DOPU, and the parking lots at the southeastern portion of the campus would be reconfigured to include two separated parking lots adjacent to Pearl Place and 24<sup>th</sup> Court, respectively. Provision of ~~the arrival court and~~ the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24<sup>th</sup> Street by providing additional space for vehicles to enter the new parking lots on either side of the campus and exit back onto 24<sup>th</sup> Street. ~~All vehicles entering via 24<sup>th</sup> Street for DOPU can be accommodated on-site within the arrival court, eliminating queuing and/or on-street parking on 24<sup>th</sup> Street.~~ The construction of these parking lots would occur during Phase 2 of the Proposed Project (see Figure 5.10-2, *Proposed Vehicular/Pedestrian Circulation*).

Phase 3 of the Proposed Project would include removal of four portable buildings on the eastern boundary of the campus, which would allow for the expansion of the new southeastern parking lot. Overall, the Proposed

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Project would increase parking on the existing campus from 62 to 94 parking spaces (or 80 parking spaces with the implementation of the Design Option, Pearl Street Community Plaza) and reduce the need for on-street parking.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page K-2, *Existing School Operations and Circulation*, of Appendix K. The following text has been updated in response to Comments on the DEIR.

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Field observations of the Campus and its surroundings were conducted by IBI staff on Tuesday, May 3, 2022, and identified existing traffic patterns, access points, DOPU operations, pedestrian/vehicular conflict areas, and pedestrian circulation. All grades begin at 8:00am with TK-K dismissed at 1:45pm, Pre-K at 2:30pm, and Grades 1 through 5 between 2:40pm and 3:00pm during the week, except for Wednesdays where TK-K and Pre-K are dismissed at 1:00pm and the remaining students between 1:15pm and 1:30pm. No special events, activities, or early dismissal were scheduled during the observation day. While ~~the majority of students are dropped off by a vehicle~~ a significant portion of the students are dropped off by a vehicle, Grant ES is a neighborhood serving public school, and many of its students walk, bike, or skate to and from the Campus.

The City's Safe Routes to Schools program aims to make taking active transportation to and from school a customary part of everyday life and includes the "Bike It! Walk It! Bus It!" events that take place twice a year, each fall and spring, to encourage safety training for students and their parents, outreach and events, and infrastructure improvements. In October 2022 the event had 3,315 total participants, including 481 from student, parents, and staff from Grant ES; and in May 2023, the event had 2,607 total participants, including 468 from Grant ES. Additionally, during the 2022-2023 school year Grant ES students had 48 enrollees in the Metro GoPass TAP card program for public transit; and a total of 2,175 total boardings were recorded for 2022-2023.

The current DOPU operations occur at two locations:

- Pearl Street DOPU: Curbside on the south side of Pearl Street between 24th Court and Cloverfield Boulevard
- 24th Street DOPU: 24th Street at the southern end of the Campus, DOPU typically occurs within the existing parking lot in a counterclockwise manner.

**Pearl Street DOPU:** ~~The Pearl Street DOPU area is limited to TK, Pre-Kindergarten, and Kindergarten students.~~ In the morning and afternoon, cars were observed to queue on the south (eastbound) side of Pearl Street, between Cloverfield Boulevard and 24th Court. Cars were also observed parking on 24th Street, north of the Campus. A red curb exists on the portion of Pearl Street at its intersection with 24th Street. In the

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morning, drop-offs occurred as early as 7:30am. In the afternoon, cars were observed to arrive as early as 1:15pm and parked curbside along Pearl Street and 24th Street.

Students who walk or bike/skate to school enter through the northern end of the Campus. Marked crosswalks are present on the north and east legs of the 24th Street/Pearl Street intersection. Marked crosswalks are provided on all legs of Pearl Street's intersections with Cloverfield Boulevard and 25th Street. In order to facilitate safe pedestrian crossings from the neighborhood to the school, crossing guards are present at all three intersections in the morning and afternoon.

Pearl Street is a two-lane street with on-street parking and bike lanes on both sides of the street. During field observations, there was a bike in the bike lane and a parent who was parked opened their door. In this case, bikes needed to veer into the travel lane to avoid hitting the open door. Vehicles entering and exiting the DOPU curb area, coupled with the pedestrian crossing activity at the intersection of Pearl Street and 24th Street and bike activity caused some queues to extend from 24th Street to just past Cloverfield Boulevard. Other observations include some parents who park on Cloverfield Boulevard and walk their kids to the main entrance, avoiding the queue on Pearl Street.

**24th Street DOPU:** ~~The 24th Street DOPU at the southern end of the Campus is utilized by Grades 1 through 5 students and is accessed primarily via Ocean Park Boulevard.~~ 24th Street, a two-lane collector street that ends at the gated entrance into the southern portion of the Campus. On-street parking is allowed on either side of the street. Vehicles were observed to enter the Campus' driveway and follow the counterclockwise circular vehicular pattern within the existing staff parking lot, exiting back onto 24th Street. In the morning, drop-offs occurred as early as 7:40am. In the afternoon, cars were observed to arrive as early as 2:00 pm and parked along 24th Street and within the parking lot. The vehicular access gate was observed to be open all day.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page K-6, *The Proposed Project's Traffic-Related Impact Analysis*, of Appendix K. The following text has been updated in response to Comments on the DEIR.

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An arrival court that connects south parking lots to 24th Street would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street. ~~be provided and would accommodate vehicular circulation to parking lots at the SE and SW corners of the Campus.~~ Staff parking would be separated from ~~daily DOPU operations~~ the arrival court with the implementation of the new parking lots, and students who walk or bike to campus and arrive from 24th Street would have access to the campus from the south without having to cross vehicular circulation. Provision of ~~the arrival court and~~ the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24th Street by providing additional space for vehicles to enter through the new parking lots on either side of the Campus and exit back onto 24th

### 3. Revisions to the DEIR

Street. All vehicles entering via 24th Street for DOPU operations can be accommodated on-site ~~within the arrival court~~, eliminating queuing and/or on-street parking on 24th Street.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

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Page K-14, *Conclusions*, of Appendix K. The following text has been updated in response to Comments on the DEIR.

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The Proposed Project would include an arrival court that connects the new south parking lots to 24th Street and would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street ~~accommodate vehicular circulation to parking lots at the southeast and southwest corners of campus.~~ The arrival court would provide a safer DOPU area entry for students who walk and bike to school that are dropped off or picked up at the southern end of the Campus; ~~Since parking for school staff would be separated from daily DOPU operations~~ the arrival court, and students who walk or bike to campus and arrive from 24th Street would have access to the campus from the south without having to cross vehicular circulation. Provision of ~~the arrival court and~~ the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24th Street by providing additional space for vehicles to enter through the new parking lots on either side of the Campus and exit back onto 24th Street. All vehicles entering via 24th Street for DOPU operations can be accommodated on-site ~~within the arrival court~~, eliminating queuing and/or on-street parking on 24th Street.

The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

### 3.3 FIGURE CHANGES

The following new figure has been added in response to comments received during the public review period of the DEIR and includes the design option for the proposed Pearl Steet Community Plaza:

**Figure 3-7b.** *Proposed Project Site Plan - Phase 2* [Revised]

**Figure 3-9.** *Design Option, Pearl Street Community Plaza* [New]

**Figure 5.10-2.** *Proposed Vehicular/Pedestrian Circulation* [Revised]

The proposed revisions to these figures and addition of one new figure does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably

### 3. Revisions to the DEIR

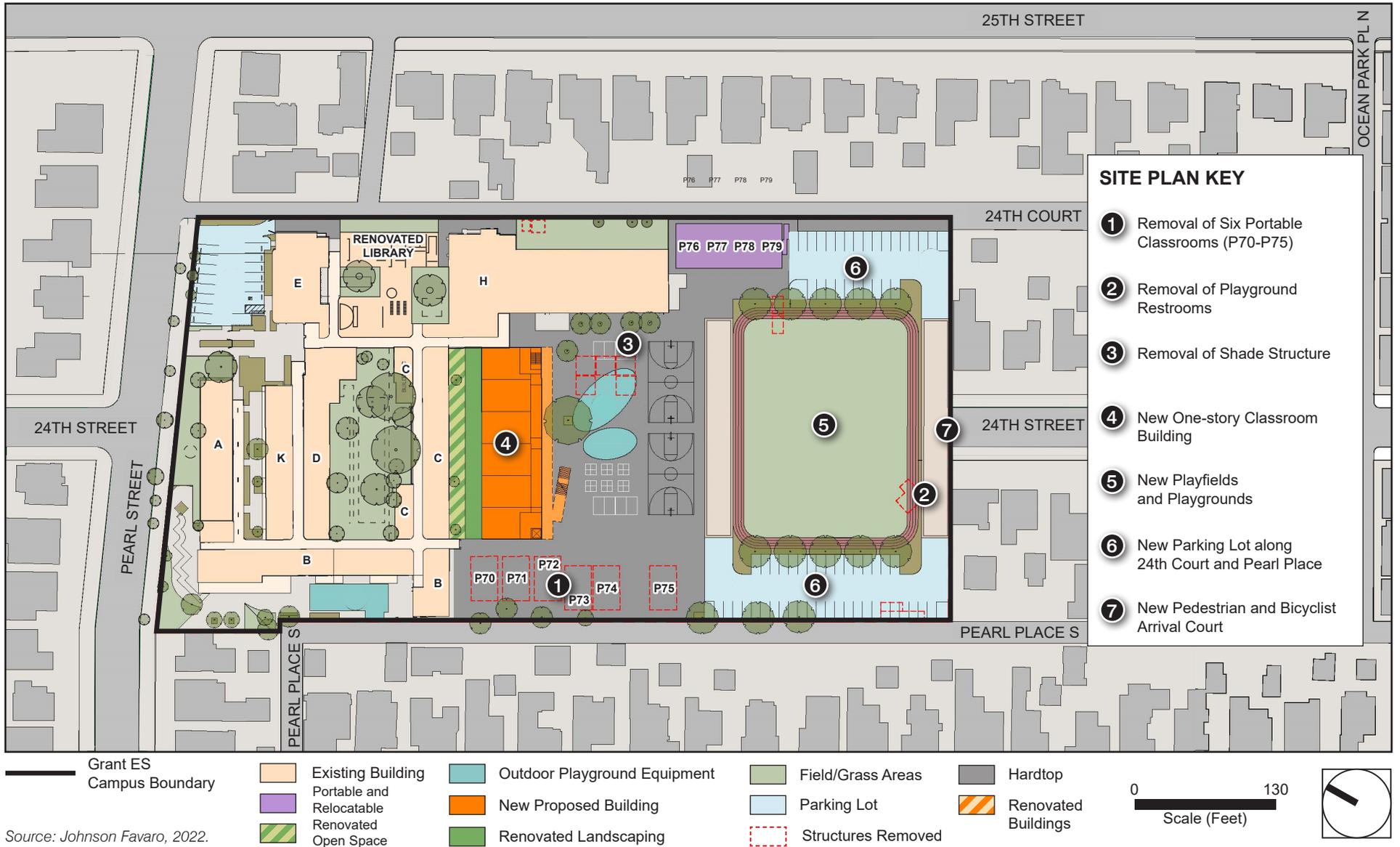
different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

#### 3.4 APPENDIX CHANGES

The following DEIR appendices have been revised:

APPENDIX K Grant ES Access and Pedestrian Safety Memo **[Revised]**

Figure 3-7b - Proposed Project Site Plan - Phase 2



### 3. Revisions to the DEIR

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Figure 3-9 - Design Option, Pearl Street Community Plaza

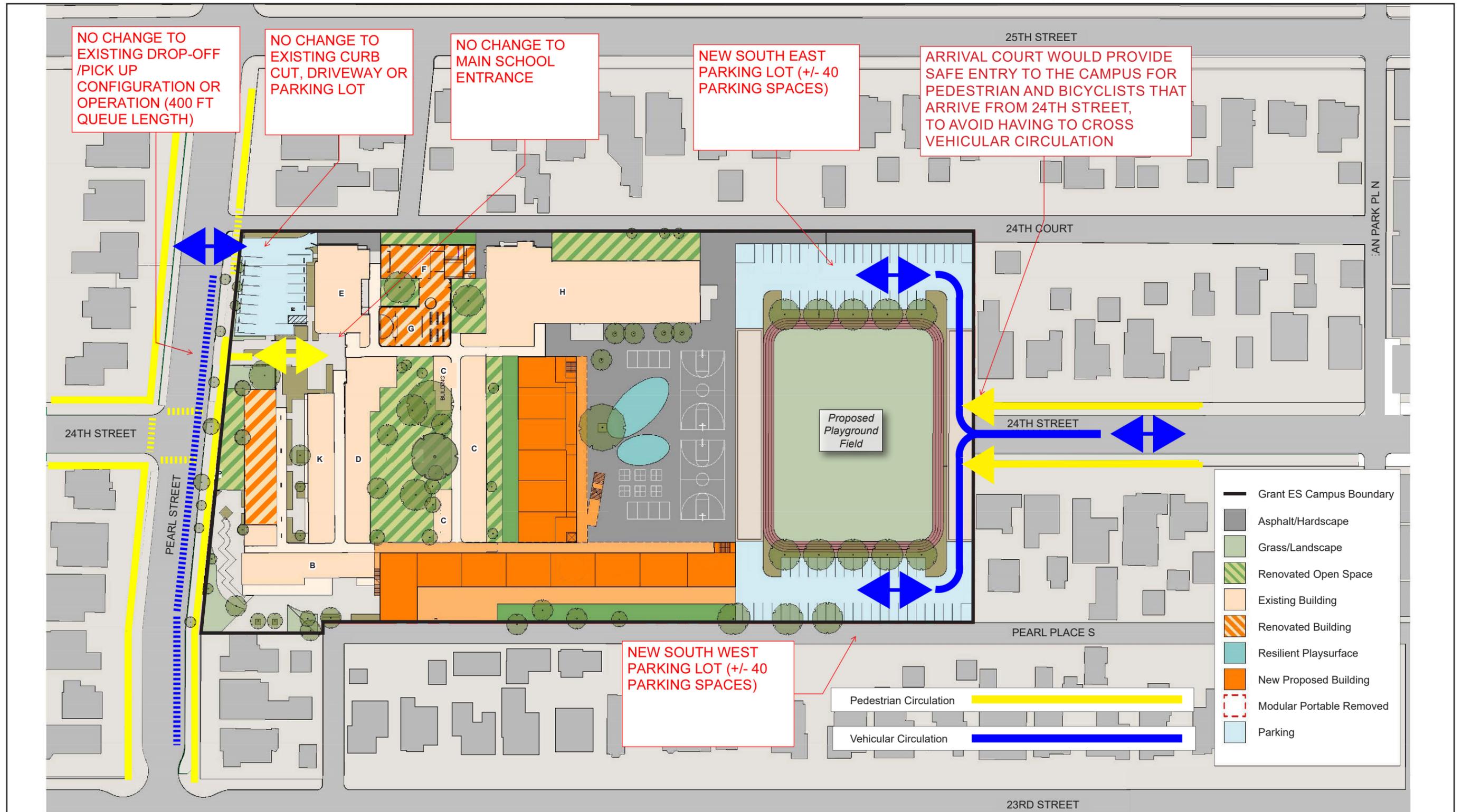


Source: Johnson Favaro, 2023.

### 3. Revisions to the DEIR

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Figure 5.10-2 - Proposed Vehicular/Pedestrian Circulation



Source: Johnson Favaro, 2022.

0 90  
 Scale (Feet)



### 3. Revisions to the DEIR

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### 3. Revisions to the DEIR

# APPENDIX K Grant ES Access and Pedestrian Safety Memo (Revised)



# Memorandum

|                     |   |                   |   |
|---------------------|---|-------------------|---|
| <b>To/Attention</b> | Addie Farrell, PlaceWorks   | <b>Date</b>       | October 5, 2023<br>March 21, 2024 (Revised) |
| <b>From</b>         | Mike Arizabal, Arcadis IBI Group  | <b>Project No</b> | 136646                                      |
| <b>cc</b>           | SMMUSD  |                   |   |
| <b>Subject</b>      | Grant ES Campus Master Plan Project - Access and Pedestrian Safety Analysis |                   |   |

Arcadis IBI Group has prepared an access and pedestrian safety analysis technical memorandum in support of an environmental impact report (EIR) for the proposed modernization of Grant Elementary School (Grant Elementary School Campus Master Plan) (Proposed Project) in Santa Monica, California. This memorandum assesses existing and proposed conditions for vehicular access (parking and drop-off/pick-up (DOPU) operations) and safety related to pedestrian circulation. The analysis was prepared in accordance with relevant City of Santa Monica Development Standards and the Santa Monica Department of Transportation (SaMoDOT). This technical memorandum includes a description of the Proposed Project, trip generation estimates for the Proposed Project, existing and future DOPU activities, data collection and observations, a pedestrian safety analysis, and a vehicle-miles traveled (VMT) screening.

## THE PROPOSED PROJECT’S DESCRIPTION

The Santa Monica Malibu Unified School District (SMMUSD or District) owns and operates the Grant Elementary School (Grant ES) Campus (Campus), which is bordered by Pearl Street to the north, Pearl Place to the west, 24<sup>th</sup> Court to the east, and 24<sup>th</sup> Street and single-family homes to the south. The Campus is surrounded exclusively by residential land uses and is considered a neighborhood school where many of the students bike, walk, and skate to school. The main vehicular access to the Campus is off Pearl Street at the northern end with a secondary access off 24<sup>th</sup> Street at the southern end.

The District proposes the following three (3) phases:

- Phase 1: Renovate and expand the library in Buildings F and G, improve the central garden, and consolidate the TK and Kindergarten classrooms in Building A.
- Phase 2: Remove six (6) portable classrooms and remove playground restrooms, reconfigure the existing playfield and playground, relocate the parking lot, add a new one-story classroom building.
- Phase 3: Remove four (4) portable classrooms and two (2) classrooms from Building B and add a new two-story classroom building.

The Proposed Project is a Campus redevelopment project meant to update school facilities to facilitate modern-day teaching philosophies for the existing and projected enrollment and would not result in an increase in student population or enrollment, and as such a traffic study is not required per SaMoDOT guidelines.

## EXISTING SCHOOL OPERATIONS AND CIRCULATION

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Field observations of the Campus and its surroundings were conducted by IBI staff on Tuesday, May 3, 2022, and identified existing traffic patterns, access points, DOPU operations, pedestrian/vehicular conflict areas, and pedestrian circulation. All grades begin at 8:00am with TK-K dismissed at 1:45pm, Pre-K at 2:30pm, and Grades 1 through 5 between 2:40pm and 3:00pm during the week, except for Wednesdays where TK-K and Pre-K are dismissed at 1:00pm and the remaining students between 1:15pm and 1:30pm. No special events, activities, or early dismissal were scheduled during the observation day. While a significant portion of the students are dropped off by a vehicle, Grant ES is a neighborhood serving public school, and many of its students walk, bike, or skate to and from the Campus.

The City's Safe Routes to Schools program aims to make taking active transportation to and from school a customary part of everyday life and includes the "Bike It! Walk It! Bus It!" events that take place twice a year, each fall and spring, to encourage safety training for students and their parents, outreach and events, and infrastructure improvements. In October 2022 the event had 3,315 total participants, including 481 from student, parents, and staff from Grant ES; and in May 2023, the event had 2,607 total participants, including 468 from Grant ES. Additionally, during the 2022-2023 school year Grant ES students had 48 enrollees in the Metro GoPass TAP card program for public transit; and a total of 2,175 total boardings were recorded for 2022-2023.

The current DOPU operations occur at two locations:

- **Pearl Street DOPU:** Curbside on the south side of Pearl Street between 24<sup>th</sup> Court and Cloverfield Boulevard
- **24<sup>th</sup> Street DOPU:** 24<sup>th</sup> Street at the southern end of the Campus, DOPU typically occurs within the existing parking lot in a counterclockwise manner.

**Pearl Street DOPU:** In the morning and afternoon, cars were observed to queue on the south (eastbound) side of Pearl Street, between Cloverfield Boulevard and 24<sup>th</sup> Court. Cars were also observed parking on 24<sup>th</sup> Street, north of the Campus. A red curb exists on the portion of Pearl Street at its intersection with 24<sup>th</sup> Street. In the morning, drop-offs occurred as early as 7:30am. In the afternoon, cars were observed to arrive as early as 1:15pm and parked curbside along Pearl Street and 24<sup>th</sup> Street.

Students who walk or bike/skate to school enter through the northern end of the Campus. Marked crosswalks are present on the north and east legs of the 24<sup>th</sup> Street/Pearl Street intersection. Marked crosswalks are provided on all legs of Pearl Street's intersections with Cloverfield Boulevard and 25<sup>th</sup> Street. In order to facilitate safe pedestrian crossings from the neighborhood to the school, crossing guards are present at all three intersections in the morning and afternoon.

Pearl Street is a two-lane street with on-street parking and bike lanes on both sides of the street. During field observations, there was a bike in the bike lane and a parent who was parked opened their door. In this case, bikes needed to veer into the travel lane to avoid hitting the open door. Vehicles entering and exiting the DOPU curb area, coupled with the pedestrian crossing activity at the intersection of Pearl Street and 24<sup>th</sup> Street and bike activity caused some queues to extend from 24<sup>th</sup> Street to just past Cloverfield Boulevard. Other observations include some parents who park on Cloverfield Boulevard and walk their kids to the main entrance, avoiding the queue on Pearl Street.

**24<sup>th</sup> Street DOPU:** T24<sup>th</sup> Street, a two-lane collector street that ends at the gated entrance into the southern portion of the Campus. On-street parking is allowed on either side of the street. Vehicles were observed to enter the Campus' driveway and follow the counterclockwise circular vehicular pattern within the existing staff parking lot, exiting back onto 24<sup>th</sup> Street. In the morning, drop-offs occurred as early as 7:40am. In the afternoon, cars were observed to arrive as early as 2:00pm and parked along 24<sup>th</sup> Street and within the parking lot. The vehicular access gate was observed to be open all day.

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It was noted during field observations that some parents drop-off or pick-up students in the 24<sup>th</sup> Street parking lot prior to the turnaround area. Children would cross the drive aisle either from or to their vehicle.

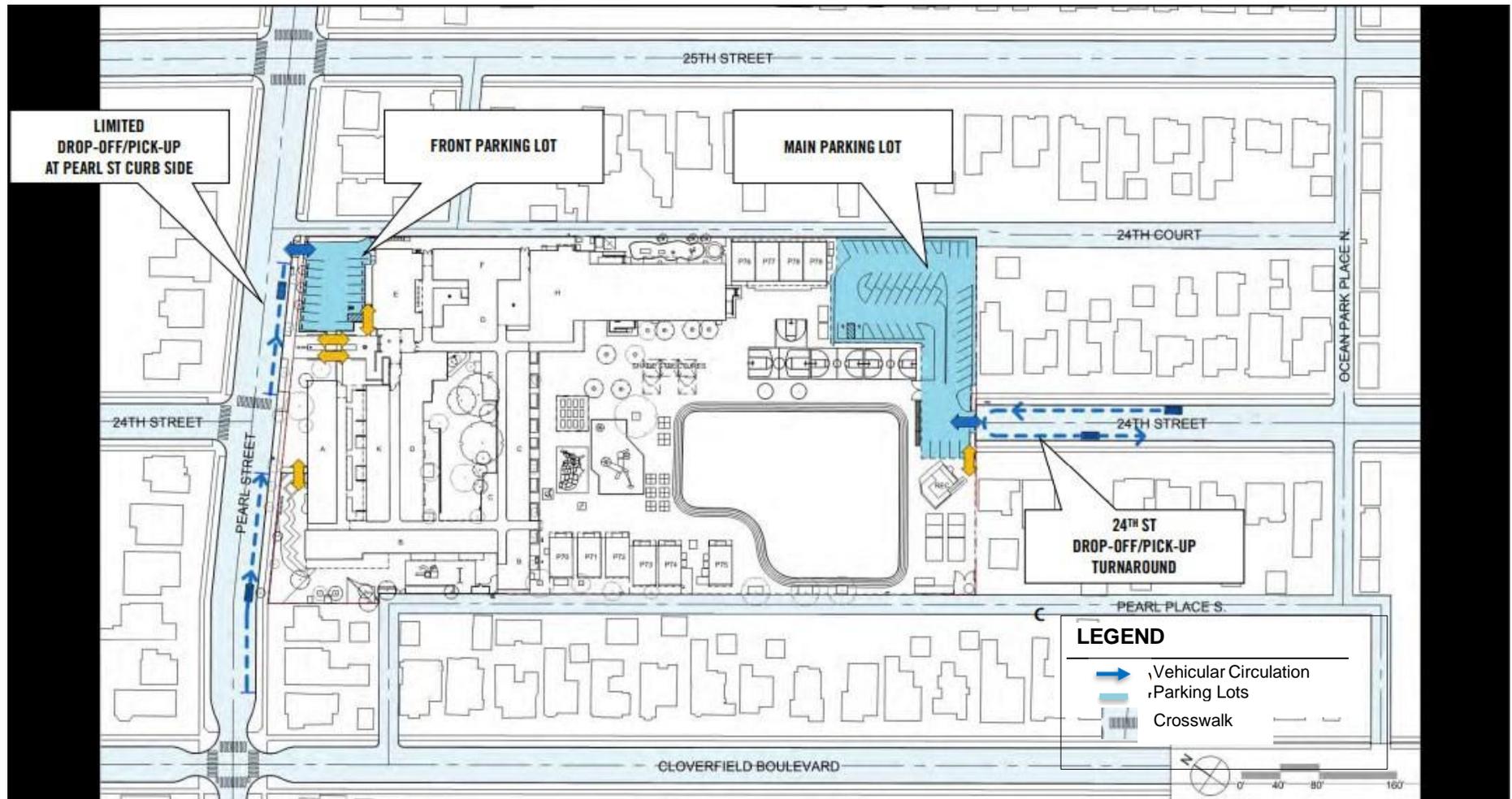
Two parking lots with a total of 62 spaces are provided at the Campus, the front lot (southwest corner of Pearl Street and 24<sup>th</sup> Court) and the main lot (southeast corner of the Campus). The front lot has 14 parking spaces and is reserved for administrative staff and visitors with administrative/office business. The main lot has 48 spaces and is used by other school staff/teachers. Figure 1 below shows the existing DOPU operations and parking lot locations.

Emergency vehicle access is provided on all four sides of Campus. This includes Pearl Street, 24<sup>th</sup> Court, 24<sup>th</sup> Street, and Pearl Place. Additionally, emergency access is provided from the arrival court and around the field and playground areas at the south side of the Campus.

Six bike racks (for 12 bicycles) are located near the main entrance to the Campus off Pearl Street.



**FIGURE 1: VEHICULAR CIRCULATION AND PARKING LOCATIONS**





## **SCHOOL TRIP GENERATION AND DISTRIBUTION**

A description of the methods utilized to generate trips related to the existing school population and their distribution to the DOPU areas are presented below.

### **Trip Generation**

The trip generation for the Campus was estimated using the rate published for Land Use Code 520 (Elementary School) in the Institute for Transportation Engineers (ITE) *Trip Generation Manual* (11<sup>th</sup> Edition, 2021). The Proposed Project would not change the school's existing programs, and the Proposed Project would not expand the school enrollment capacity or change school enrollment boundaries. The most recent student population figure for the 2022-2023 school year was 550 students, approximately 105 of which are Pre- K, TK, and Kindergarten students and 445 students in Grades 1 through 5.

Based on a 550-student population, a total of 1,249 daily trips are generated with 413 trips being in the AM (223 inbound and 190 outbound) and 248 trips in the PM (114 inbound and 134 outbound) and accounts for students who walk or are walked to and from the Campus.

**Table 1** Proposed Project Trip Generation and Rates

| Source       | Land Use          | Students | Trip Generation               |                  |      |       |                 |      |       |
|--------------|-------------------|----------|-------------------------------|------------------|------|-------|-----------------|------|-------|
|              |                   |          | Daily                         | AM Peak Drop-Off |      |       | PM Peak Pick-Up |      |       |
|              |                   |          |                               | In               | Out  | Total | In              | Out  | Total |
|              |                   |          | <b>Rates</b>                  |                  |      |       |                 |      |       |
| ITE Code 520 | Elementary School |          | 2.27                          | 0.41             | 0.35 | 0.75  | 0.21            | 0.24 | 0.45  |
|              |                   |          | <b>Estimated School Trips</b> |                  |      |       |                 |      |       |
|              | Pre-K, TK, and K  | 105      | 239                           | 43               | 36   | 79    | 22              | 25   | 47    |
|              | Grades 1-5        | 445      | 1,010                         | 180              | 154  | 334   | 92              | 108  | 200   |
|              | Total             | 550      | 1,249                         | 223              | 190  | 413   | 114             | 134  | 248   |

Trip generation rates:

1. Institute of Transportation Engineers (ITE) Trip Generation Manual

The trip generation was further broken down by grade level. Pre-K, TK, and K generate approximately 239 daily trips with 79 occurring in the morning AM (43 inbound and 36 outbound) and 47 trips in the afternoon PM (22 inbound and 25 outbound). Grades 1 through 5 are estimated to generate approximately 1,010 daily trips with 334 occurring in the morning AM (180 inbound and 154 outbound) and 200 in the afternoon PM (92 inbound and 108 outbound). It is assumed that the traffic associated with the Pre-K, TK, and K utilize the Pearl Street DOPU area and traffic associated with Grades 1 through 5 use the 24<sup>th</sup> Street DOPU.

The trip generation estimate is conservative as this is a neighborhood school with most students residing within a few miles of the Campus. A large percentage of the students walk, bike, or skate to and from the Campus, as determined by IBI observations and the previous walk audit conducted by community members, SMMUSD, and City of Santa Monica staff.

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## **THE PROPOSED PROJECT'S TRAFFIC-RELATED IMPACT ANALYSIS**

Based on field observations, the estimated trip generation of the Campus (existing and proposed would remain the same), and the observations and recommendations referenced from the Santa Monica Safe Routes to School Walk Audit Report (October 2018), this section provides an analysis of the proposed improvements as they relate to issues identified for vehicular circulation and pedestrian safety. The proposed site plans for each phase are shown in Figures 2, 3, and 4. As shown in each of the figures, the only modification that has the potential to affect traffic and circulation is the provision of two new parking lots separated by a new playing field at the southern end of the Campus as part of the Phase 2 buildout of the Proposed Project. DOPU areas would remain unchanged and the parking lot on Pearl Street/24<sup>th</sup> Court would remain unchanged.

Currently, Campus access from vehicular DOPU for TK-K grades is provided from Pearl Street with some caregivers parking along 24<sup>th</sup> Court, at the front of the Campus. Grades 1 through 5 are dropped off at the rear of the Campus at the entrance to staff parking along 24<sup>th</sup> Street.

The Proposed Project would maintain a DOPU area in the north parking lot. All classrooms at-ground and second floors would be connected via covered outdoor walkways on the internal Campus-facing side of the east and west wings of the school buildings. Covered outdoor circulation would connect the east and west wings across the Campus in three locations.

Vehicular access to the Campus would remain along Pearl Street and 24<sup>th</sup> Street for TK, K, and Pre-K students. The existing parking lot in the northeastern portion of the Campus would remain and would be used for visitor and administrative parking.

The existing L-shaped parking lot in the southeast portion of the Campus would be reconfigured into two new parking lots, located at the southeast and southwest corners of the Campus, separated by the improved athletic field. Each parking lot would include approximately 40 parking stalls and would provide staff and after-hours/weekend community parking that is utilized for joint us purposes (i.e., soccer games). Overall, the Proposed Project would increase parking on the Campus from 62 to 94 parking spaces and reduce the need on-street parking.

An arrival court that connects south parking lots to 24<sup>th</sup> Street would provide safe access to the campus for students who walk or bike to campus, and arrive from 24<sup>th</sup> Street. Staff parking would be separated from the arrival court with the implementation of the new parking lots, and students who walk or bike to campus and arrive from 24<sup>th</sup> Street would have access to the campus from the south without having to cross vehicular circulation. Provision of the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24<sup>th</sup> Street by providing additional space for vehicles to enter through the new parking lots on either side of the Campus and exit back onto 24<sup>th</sup> Street. All vehicles entering via 24<sup>th</sup> Street for DOPU operations can be accommodated on-site, eliminating queuing and/or on-street parking on 24<sup>th</sup> Street.

Emergency vehicle access would continue to be provided on all four sides of the Campus. This includes Pearl Street, 24<sup>th</sup> Court, 24<sup>th</sup> Street, and Pearl Place. Additionally, emergency access would continue to be provided from the arrival court and around the field and playground areas at the south side of Campus.

The Proposed Project does not propose any changes to the DOPU operations on Pearl Street. With no increase to the student population as part of the Proposed Project, no new impacts are anticipated.

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### ***Pedestrian Safety and Circulation***

A large portion of the student population walks and bikes to and from the Campus via the adjacent neighborhood, with the majority entering the Campus from the main entrance off Pearl Street. Pedestrian paths would need to be delineated to connect the sidewalk on Pearl Street to the entrance of the Campus. Any walkways through the Pearl Street area would need to continue to maintain pedestrian treatments for added safety. These existing treatments include clearly marked crosswalks, stop signs, and crossing guards.

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## VMT SCREENING

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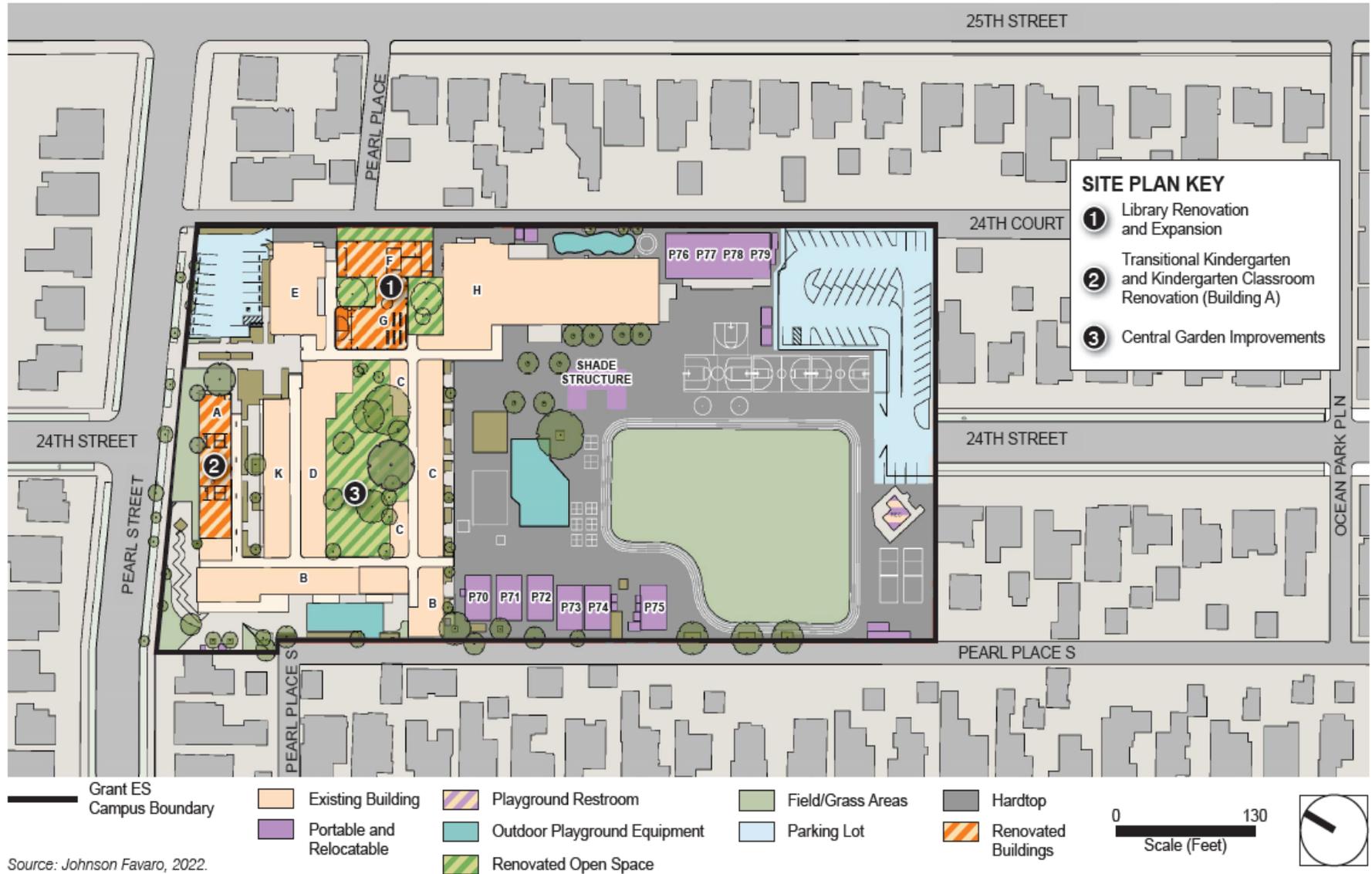
The updated California Environmental Quality Act (CEQA) Guidelines Section 15064.3, certified and adopted by the California Natural Resources Agency in December 2018 have been in effect since July 2020 and specify VMT as the appropriate metric to evaluate project impacts. On June 9, 2020, the Santa Monica City Council adopted a new process for analyzing the transportation impacts of land use and transportation projects consistent with State law (Office of Planning and Research). For land use projects in Santa Monica, the analysis consists of a two-step process which includes VMT screening and, if necessary, VMT analysis. The adopted screening criteria, analytical methods, and significance thresholds, are outlined as follows:

1. Does the project include the development of the following land uses, which are screened out from further analysis?
  - a. 200 residential dwelling units or less
  - b. 100% affordable housing
  - c. 50,000 sf or less of commercial floor area by land use type
  - d. New construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increased, 75% of the student body comes from within 2.0 miles of the Campus.
  - e. Expansions of civic/government use (such as fire and police stations) and utility facilities less than 50,000 sf or replacement of such uses/facilities (in same or another location) to serve the community, or if larger than 50,000 sf, the project would not result in more than 50 net new additional full time equivalent employees.
  - f. Local serving Parks and Recreational facilities, as determined by City Staff

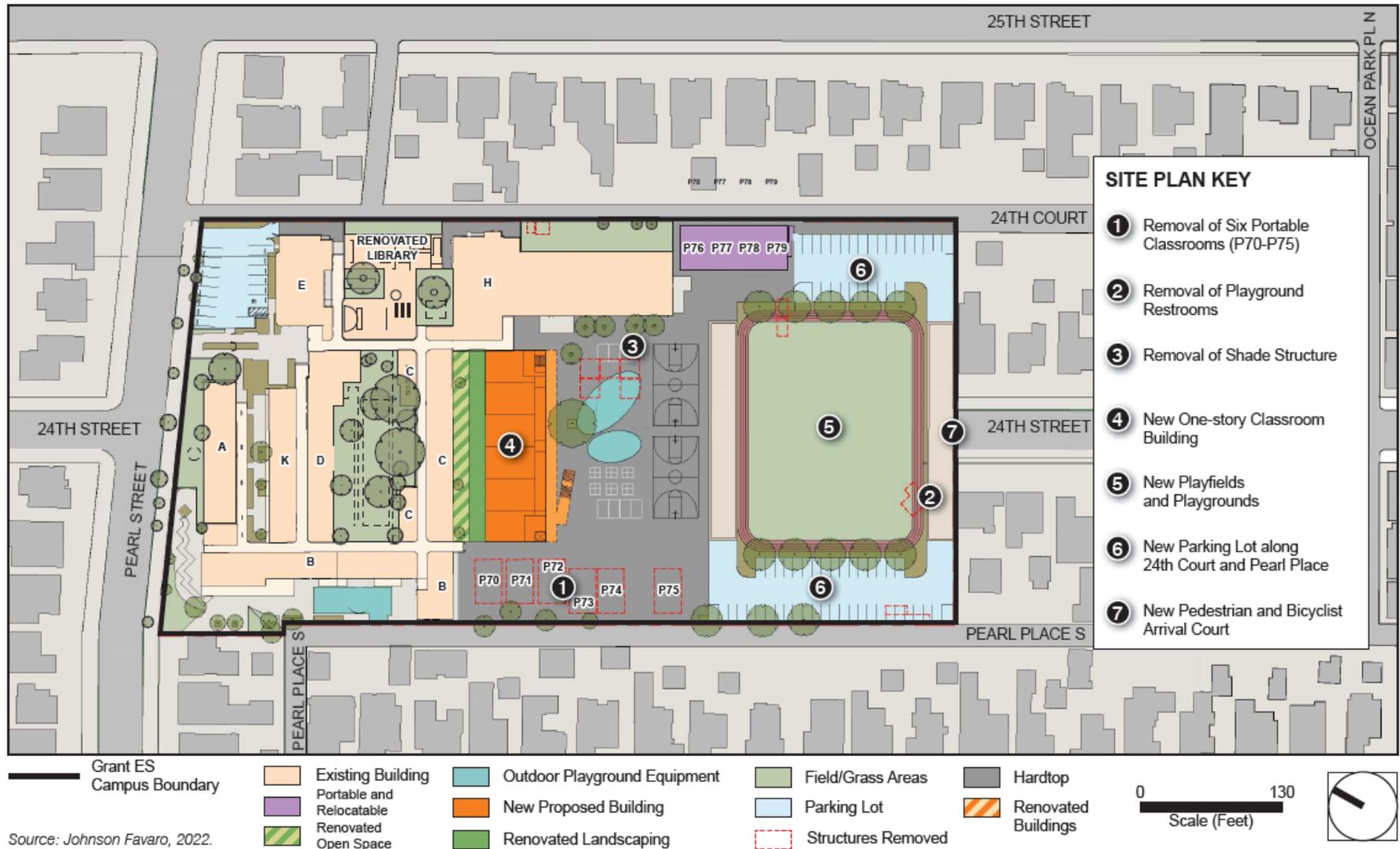
As the Proposed Project falls under category 1d, the Proposed Project would not be required to prepare a VMT analysis (project only needs to meet one criterion to be screened out of a VMT study). A presumption of a non-significant transportation impact can be made for the Proposed Project.



**FIGURE 2: PHASE 1 SITE PLAN**

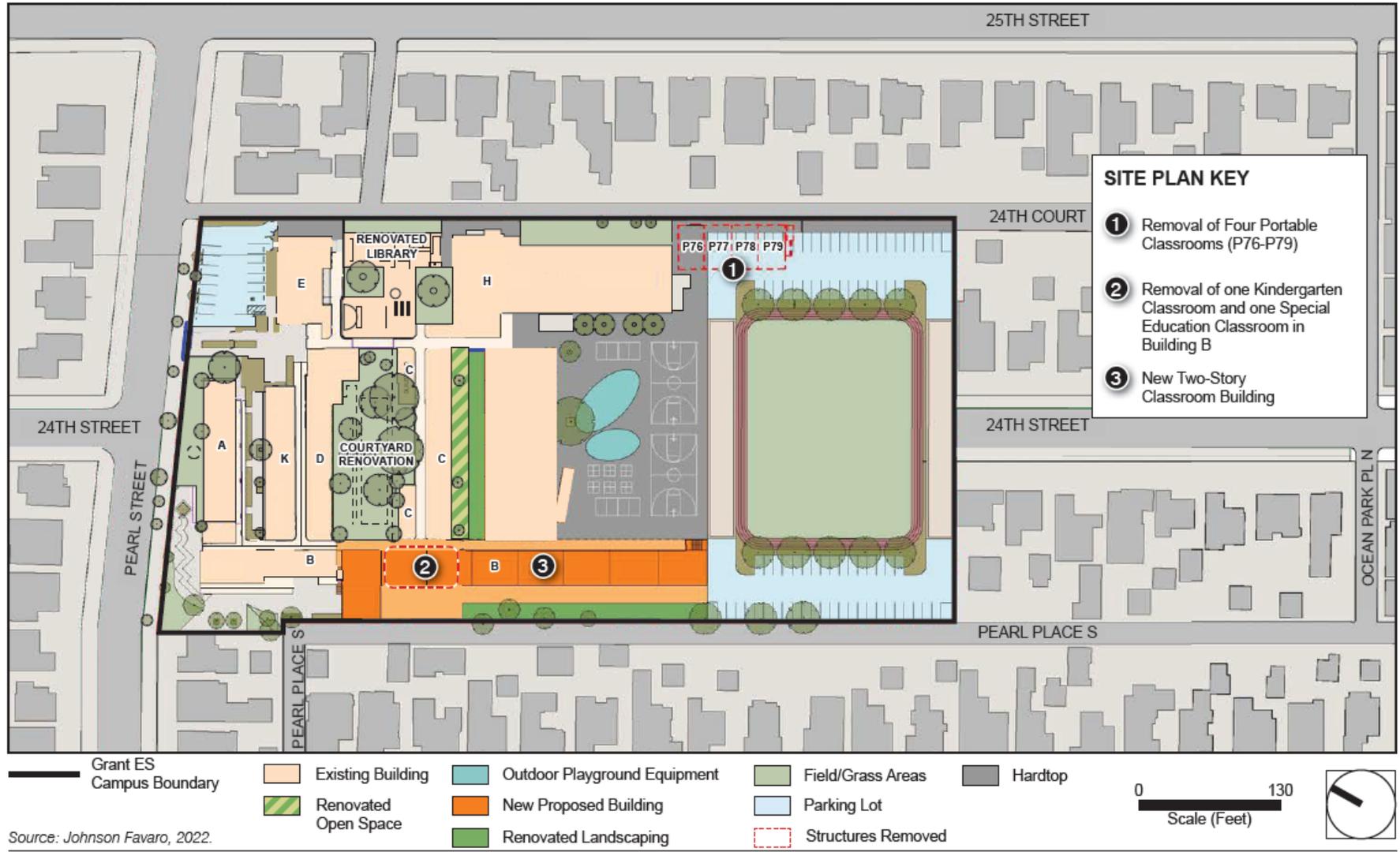


**FIGURE 3: PHASE 2 SITE PLAN**



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**FIGURE 4: PHASE 3 (BUILDOUT) SITE PLAN**



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## **CONSTRUCTION-RELATED TRAFFIC**

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The Proposed Project would be constructed in three phases, with construction activities for Phase 1 anticipated to start as early as summer 2024. While the exact dates for the later phases are not known, for purposes of evaluating potential impacts from implementation of the Proposed Project, construction activities for Phase 2 were assumed to start in summer 2025, and construction activities for Phase 3 were assumed to start as early as summer 2028.

The construction for Phase 1 would occur over approximately 12 months and include the following activities renovation and expansion of the existing library, renovation of the transitional kindergarten and kindergarten classrooms, and improvements to the central garden; and no demolition would occur during Phase 1. The construction for Phases 2 and 3 is anticipated to occur over approximately 24 months and 24 months, respectively. The District would request an After Hours Work Permit to allow for construction outside of the allowed hours identified in the Santa Monica Municipal Code section 4.12.110(a) which limits the hours of construction to 8:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturday; and prohibits construction on Sundays and holidays. The After-Hours Construction Permit would allow Proposed Project construction to begin at 7:00 a.m. The earlier arrival of contractors would allow them to be within the work area prior to student arrival/drop-off, thereby improving pedestrian safety and reducing traffic congestion during construction activities.

The District would post one sign along the street frontage of each construction area and notifications to neighbors within a 500-foot radius of construction activities. The notifications would include a description of the activities and the dates and times that these activities would take place. The notifications must also include the contact information of the permit holder (i.e., the District) and the City contact. The District would be required to follow Santa Monica Municipal Code section 4.12.110, which limits the hours of construction to 8:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturday, unless an exemption is requested; and prohibits construction on Sundays and holidays. School operation would continue during construction as under current conditions, and students would occupy existing buildings including portable buildings on the Campus during construction activities.

The maximum estimated number of construction-related trips occurring during any phase is 52 trips (Phase 2 Building and Asphalt Demolition and Debris Haul, Site Preparation). The 52 trips would be spread out over the course of a single workday. Routing of these trips would occur on Ocean Park Boulevard (Santa Monica designated Truck Route) to 24<sup>th</sup> Street and ultimately to a staging area within the Campus, away from school operations.

These vehicle trips would include construction workers traveling to the Campus as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the Campus would require several oversized vehicles that may travel at slower speeds than existing traffic. Construction traffic would be scheduled in concert with the operations of the school, ensuring that trucks are not moving in or out during DOPU times. Construction workers would park in the designated staging area to provide adequate parking for all employees and visitors to the Campus throughout the duration of construction activities of the Proposed Project.

During construction activities, the construction contractor would be required to prepare and implement a Construction Management Plan (CMP) to address safety hazards, including but not limited to avoidance of construction staging and delivery during off-peak DOPU times (see Mitigation Measure T-1 below).

### **Mitigation Measure T-1:**

Before the start of construction of each phase, the SMMUSD shall work with the City of Santa Monica Public Works Department to develop and implement a Construction Management Plan that is specific to the needs of each phase. The Construction Management Plan shall include a Temporary Traffic Control Plan (TTCP) to address anticipated impacts to or closures of public rights-of-way. The Construction Management Plan (including the TTCP) shall be submitted to the City Public Works Department for approval prior to construction of each phase of the Proposed Project. The TTCP shall demonstrate appropriate traffic handling during construction activities for all work that could impact the traveling public (e.g., the transport of equipment and materials to the campus area). The TTCP shall minimize hazards through industry-accepted traffic control practices. At a minimum, the TTCP shall require the contractor to do the following:

- Obtain transportation permits necessary for oversize and overweight load haul routes and follow regulations of the applicable jurisdiction for transportation of oversized and overweight loads;
- Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if they could preclude free flow of traffic in both directions or cause a temporary traffic hazard; prohibit deliveries of heavy equipment and construction materials during periods of heavy traffic flow (i.e., 30 minutes before or after school start and end times);
- Develop a Traffic Education Program to assist in educating parents, students, and staff on drop-off/pick-up procedures specific to each phase of construction that includes informational materials regarding student drop-off and pick-up procedures via regular parent/school communication methods and posted on the school website;
- Utilize portable message signs and information signs at construction sites as needed;
- Coordinate with the responsible agency departments, including the City of Santa Monica Public Works and Planning Departments, and the City of Santa Monica Fire Department no less than 10 days prior to the start of the work for each phase including specifying whether any temporary vehicle, pedestrian, or bicycle construction detours are needed, if construction work would encroach into the public right-of-way, or if temporary use of public streets surrounding the campus is needed; and
- Review all existing emergency access and evacuation plans and identify procedures for construction area evacuation in the case of an emergency declared by local authorities.
- Additionally, the District shall ensure that the construction contractor follows all applicable requirements and regulations established in the City of Santa Monica Procedures and Requirements for Temporary Traffic Control Plans to ensure the TTCP is prepared to City standards and approved as necessary.



## **CONCLUSIONS**

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A full traffic impact analysis was not required since the proposed changes in the Campus master plan would not result in changes to the school enrollment number. Instead, the analysis focused on reviewing the proposed access and DOPU locations, specifically reviewing traffic operations and pedestrian safety at and near these locations as a result of the Proposed Project.

The analysis of existing conditions shows congested conditions along 24th Street at the southern end of the Campus. Observations noted vehicles either stacking in the street or utilizing the on-street parking on 24th Street prior to DOPU.

The Proposed Project would include an arrival court that connects the new south parking lots to 24th Street and would provide safe access to the campus for students who walk or bike to campus, and arrive from 24th Street. The arrival court would provide a safer entry for students who walk and bike to school at the southern end of the Campus. Since parking for school staff would be separated from the arrival court, students who walk or bike to campus and arrive from 24th Street would have access to the campus from the south without having to cross vehicular circulation. Provision of the two proposed lots at the southern end of the Campus would improve circulation for vehicles on 24th Street by providing additional space for vehicles to enter through the new parking lots on either side of the Campus and exit back onto 24th Street. All vehicles entering via 24th Street for DOPU operations can be accommodated on-site, eliminating queuing and/or on-street parking on 24th Street.

The Proposed Project would be consistent with current best practices to support students walking and bicycling to school, as described in the City's SRTS program. Pedestrian treatments such as high-visibility striping on crosswalks would be provided at the Pearl Street sidewalk as it crosses the existing Pearl Street driveway entrance, and signage that promotes clear messages to drivers, pedestrians, and bicyclists entering and exiting the Campus, would be provided for any new pedestrian paths that would cross along Pearl Street. Although there is no increase in enrollment as part of the Proposed Project, an increase in parking from 62 spaces to 94 spaces addresses the need for after-hours and weekend staff/community parking. The additional parking would also reduce the need for on-street parking.

A presumption of a non-significant transportation impact can be made for the Proposed Project as it meets the VMT screening criteria set forth by the SaMoDOT. Furthermore, impacts to traffic as considered less than significant as the Proposed Project would not increase the existing student population or enrollment figures (i.e., trip generation associated with existing school operations not proposed to change).

Construction-related trips to and from the Campus should be limited to off-peak hours - hours not occurring during DOPU operations and hours that do not correspond with the adjacent street AM or PM peak hour. Staging areas shall remain on Campus throughout the duration of construction. A maximum of 52 construction-related trips would occur for one day during Phase 2, spread across the 8-hour workday (about 6 trips per hour).

IBI Group is a group of firms providing professional services.

### 3. Revisions to the DEIR

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## 4. References

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Governor's Office of Planning and Research. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA.* //efaidnbmnnnibpcajpcgglefindmkaj/https://opr.ca.gov/docs/20190122-743\_Technical\_Advisory.pdf

Southern California Association of Governments (SCAG). 2020, September 3. *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments (Connect SoCal).* [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176).

## 4. References

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