Appendix B Initial Study/Notice of Preparation (IS/NOP)

Appendices

This page intentionally left blank.

January 2023 | Initial Study

MCKINLEY ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT

Santa Monica-Malibu Unified School District

Prepared for:

Santa Monica-Malibu Unified School District
Contact: Carey Upton, Chief Operations Officer
1651 16th Street
Santa Monica, California 90404
310.450.8338

Prepared by:

PlaceWorks
Contact: Arabesque Said-Abdelwahed, Senior Associate
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

PLACEWORKS

Table of Contents

Table of Contents

Table of Contents

List of Figures

List of Tables

Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
ALUC	Airport Land Use Commission
AQMP	air quality management plan
AR	administrative regulation
bgs	below ground surface
BMP	best management practices
BP	board policy
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources, Recycling, and Recovery
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CEQA	California Environmental Quality Act
CHPS	Collaborative for High Performance Schools
CERT	Community Emergency Response Team
CGP	Construction General Permit
CO	carbon monoxide
CPT	cone penetrometer test
dBA	A-weighted decibel
DOC	California Department of Conservation
DSA	Division of the State Architect
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EMS	energy management system
EOC	Emergency Operation Center
EPA	United States Environmental Protection Agency
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map

Abbreviations and Acronyms

FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gases
GSP	groundwater sustainability plan
HREC	historic recognized environmental condition
HRI	historic resources inventory
HTP	Hyperion Wastewater Treatment Plant
HVAC	heating, ventilating, and air conditioning system
HWRT	Hyperion Water Reclamation Plant
LACoFD	Los Angeles County Fire Department
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCP	local coastal plan
LID	low impact development
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MMRP	mitigation monitoring and reporting program
MND	mitigated negative declaration
MRZ	mineral resource zone
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
ND	negative declaration
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NWI	National Wetlands Inventory
O_3	ozone
OEM	Office Emergency Management
OPR	Office of Planning and Research
PCB	polychlorinated biphenyl
PCH	Pacific Coast Highway
PM	particulate matter
ppd	pounds per person per day

Abbreviations and Acronyms

PRC	Public Resources Code
PRD	Permit Registration Documents
REC	recognized environmental condition
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SEMS	Standardized Emergency Management System
SMFD	Santa Monica Fire Department
SMMC	Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Unified School District
SMPD	Santa Monica Police Department
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas Company
SRA	source receptor area [or state responsibility area]
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
USFWS	United States Fish and Wildlife Service
UWMP	urban water management plan
VEC	vapor encroachment condition
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
WMP	waste management plan
WPA	Works Progress Administration

1. Introduction

1.1 OVERVIEW

Santa Monica–Malibu Unified School District (SMMUSD or District) proposes to renovate and modernize the existing McKinley Elementary School (McKinley ES or campus) campus. The McKinley Elementary School Campus Master Plan (Proposed Project) is designed to update the campus facility to align with the Districtwide Educational Specifications (SMMUSD 2019). The Proposed Project would develop new and renovated facilities that would support a modern project-based learning at McKinley ES that would expand instructional strategies currently in place in the District and would address future learning that is flexible, adaptable, and project-centered in its delivery. The Proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with the Proposed Project.

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

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA and the CEQA Guidelines (Public Resources Code [PRC], section 21000 et seq.; California Code of Regulations [CCR], Title 14, sections 15000 et seq.). CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts). SMMUSD is the lead agency for the Proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the Proposed Project.

PRC section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies…." In this case, SMMUSD has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the Proposed Project would result in environmental impacts. An Initial Study is a preliminary

environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project (14 CCR section 15063).

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code sections 65100 to 65700.
- An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies (14 CCR section 15378[a]).

The proposed discretionary actions by SMMUSD constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.3 INITIAL STUDY

The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in an MND or ND; 6) eliminate unnecessary EIRs; and 7) determine if a project is covered under a previously prepared EIR. When an Initial Study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR (14 CCR section 15064); however, if all impacts are found to be less than significant or can be mitigated to less than significant, the lead agency can prepare an ND, or MND that incorporates mitigation measures into the project (14 CCR section 15070).

1.4 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of **no impact** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.

- An impact is considered **less than significant** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered **less than significant with mitigation incorporated** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
    - **Mitigation Measures**. If, after incorporation and implementation of federal, state, and local regulations, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, state, and local laws and regulations. Mitigation under CEQA Guidelines section 15370 includes:
        - Avoiding the impact altogether by not taking a certain action or parts of an action.
        - Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
        - Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
        - Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
        - Compensating for the impact by replacing or providing substitute resources or environments.
- An impact is considered **potentially significant** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.5 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the CEQA Guidelines. The conclusions in this Initial Study are that the Proposed Project would have no significant impacts. This report has the following sections:

Chapter 1, Introduction, identifies the purpose and scope of the Initial Study and the terminology used.

Chapter 2, Environmental Setting, identifies the project location, describes the existing conditions, campus history, surrounding land uses, general plan designations, and existing zoning at the McKinley ES campus and surrounding area.

Chapter 3, Project Description, provides the background, and describes the scope of the Proposed Project in detail.

Chapter 4, Environmental Checklist, presents an analysis of environmental impacts, the impact significance finding for each resource topic, and determination whether future analysis is needed in an EIR.

Chapter 5, Environmental Analysis, provides an analysis of environmental impacts, and the impact significance finding for each resource topic.

1. Introduction

Chapter 6, References, provides a list of sources for the environmental analysis.

Chapter 7, List of Preparers, identifies the individuals who prepared the Initial Study and technical studies.

2. Environmental Setting

2.1 PROJECT LOCATION

The McKinley ES campus (Project Site) is located at 2401 Santa Monica Boulevard (Assessor's Parcel Number [APN] 4276-023-900) in the Mid-City neighborhood of the city of Santa Monica, Los Angeles County, California (see Figure 1, *Regional Location*). The campus consists of a 6.48-acre rectangular parcel that includes the existing McKinley ES campus and is entirely District-owned. The campus is approximately 0.60 mile north of Interstate 10 (I-10), 2.0 miles east of the Pacific Coast Highway (PCH) and Santa Monica State Beach, and is bounded by Santa Monica Boulevard to the southeast, Chelsea Avenue to the northeast, Arizona Avenue to the northwest, and 23rd Court (alley) to the southwest (Figure 2, *Aerial Photograph*). McKinley ES is in an urban area surrounded by residential, commercial, and institutional uses. Direct access to the campus is provided by Santa Monica Boulevard and Chelsea Avenue, with student drop-off/pick-up along Chelsea Avenue.

2.2 SURROUNDING LAND USE

McKinley ES is surrounded by low-density residential neighborhoods immediately to the north, west, and south. Commercial uses are to the southeast and southwest, and medical offices are to the south across Santa Monica Boulevard. Providence Saint John's Health Center consists of midrise buildings to the west across 23rd Court. The campus is surrounded by properties zoned for Low-Density Residential (R2) and Mixed-Use Boulevard Low (MUBL) (Santa Monica 2015).

The surrounding residential neighborhood streets include Chelsea Avenue, Arizona Avenue, and 23rd Court (alley). Santa Monica Boulevard, a regional transportation corridor, is immediately south of the campus. Wilshire Boulevard is one block north of the campus.

2.3 GENERAL PLAN AND EXISTING ZONING

The City of Santa Monica General Plan Land Use designation for the McKinley ES campus is Institutional/Public Lands. The zoning designation for the campus is Institutional/Public Lands (PL)(see Figure 3a, *General Plan Land Use* and Figure 3b, *Zoning Designations*). As stated in the Santa Monica Municipal Code, permitted uses include public or semi-public facilities, including municipal offices, schools, libraries, museums, or performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This zoning designation is consistent with the Land Use and Circulation Element's Institutional/Public Lands land use designation. Additionally, according to the City of Santa Monica's Local Coastal Plan, the campus is not within the Coastal Zone and is, therefore, not subject to the City's Local Coastal Plan (LCP) (Santa Monica 2018).

2.4 EXISTING CONDITIONS

Originally built in 1922, McKinley ES serves students in preschool, transitional kindergarten, kindergarten, and grades one through five. The campus contains four buildings, identified as Buildings A through D; 11 portable classrooms and two modular classrooms; recreational portable, fields and playgrounds; a student garden; and a parking lot along Chelsea Avenue (see Table 1, *Characteristics of Existing Buildings*).

Table 1 Characteristics of Existing Buildings

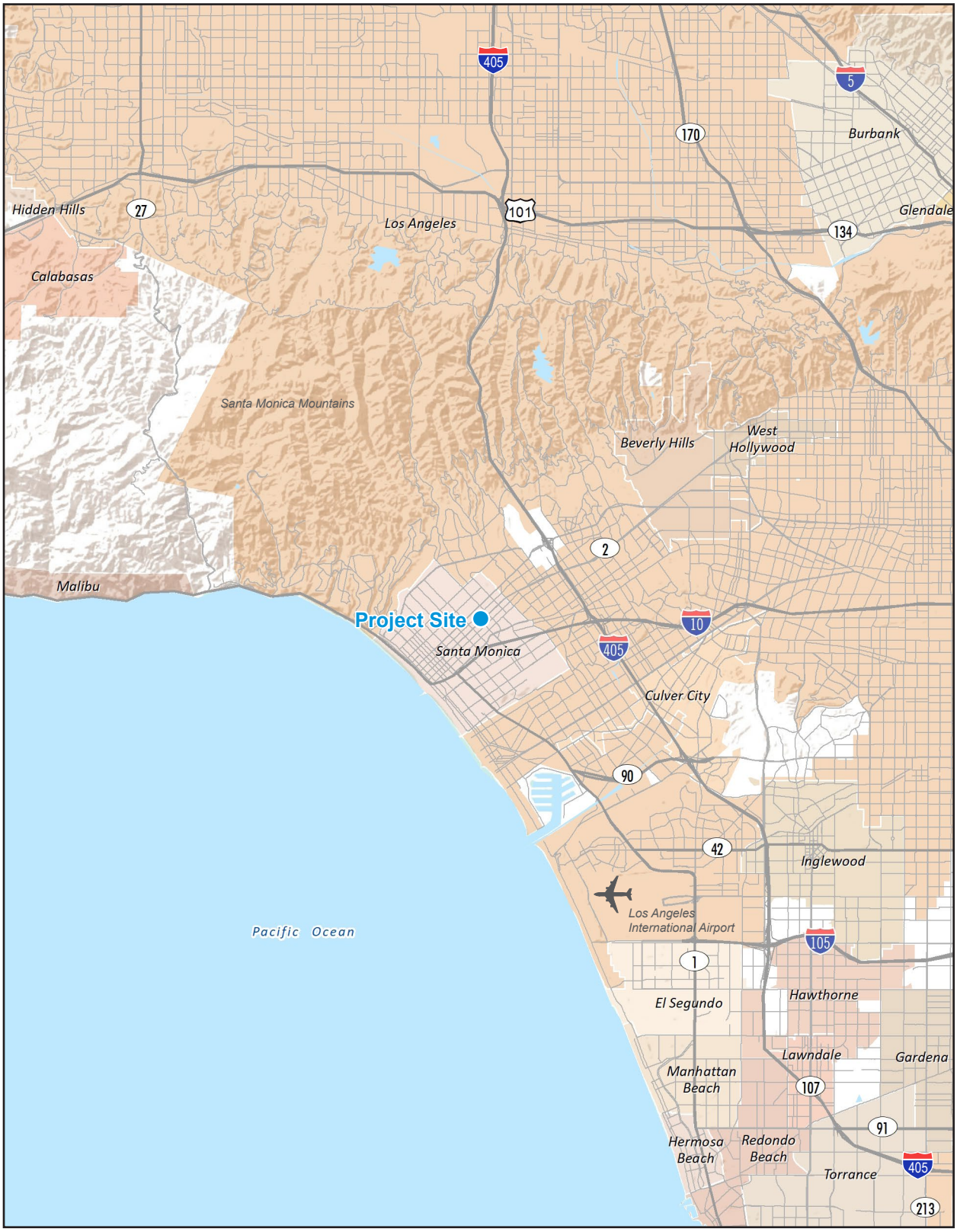
Building Name	Year Built	Current Use	Building Square Feet	Building Type	Building Height	Number of Stories
A	1951	Multipurpose Cafeteria	4,439	Permanent	23 ft-8 in	1
B	1923	Classrooms	13,425	Permanent	41 ft-4 in	2
C	1923	Administration/Classrooms/Multipurpose Auditorium	27,390	Permanent	38 ft-6 in	2
D	1973	Preschool Classrooms	3,796	Modular	11 ft-9 in	1
B1–B3	Unknown	Classrooms	2,880	Portable	12 ft	1
B4–B9	Unknown	Classrooms	5,760	Portable	12 ft	1
B10–B11	Unknown	Classrooms	1,920	Portable	12 ft	1
Recreational Building	Unknown	Recreation	468	Portable	12 ft	1

Source: Historic Resources Group 2022.

Building C is the main campus building, which includes Administration/Classrooms/Multipurpose Auditorium, and along the southern portion of the campus, setback approximately 105 feet from Santa Monica Boulevard. Kindergarten classrooms are on the ground floor of Building C in the south wing facing the Santa Monica Quad; elementary classrooms occupy the second floor of Building C's south wing and both floors of the north wing. The library occupies a room at the east end of the south wing of the main building, and the auditorium is at the west end (see Figure 4, *Existing Site Plan*, and Figure 5, *Photographs of the Existing Campus*). These buildings are concentrated in the southern part of the campus nearest Santa Monica Boulevard.

Building C faces Santa Monica Boulevard, and its architecture signals that it is the front of the campus. However, because most children arrive by automobile and are dropped off and picked up, the front of school migrated along Chelsea Avenue because of the traffic along Santa Monica Boulevard. The campus frontage facing Santa Monica Boulevard includes a landscaped quad with lawns, mature trees, and several concrete walkways leading to the main school entrance. To the west of the Santa Monica Quad are three portable classrooms near the corner of 23rd Court and Santa Monica Boulevard, and to the east of the Santa Monica Quad the existing Building D and early education and kindergarten play yards are behind six-foot-tall, chain-link fences along Santa Monica Boulevard. The existing surface parking lot includes 90 parking stalls and is accessed via Chelsea Avenue. There are buffer plantings around the perimeter of the parking lot. The northern portion of the campus has open space for school recreation. Much of this space consists of an approximately 123,275-square-foot paved asphalt surface that is used for basketball and athletic courts and contains several shade structures. There is also playground equipment installed on artificial turf and a small learning garden on the northwest corner of the campus.

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap, 2022.

0 3
Scale (Miles)

PlaceWorks

2. Environmental Setting

This page intentionally left blank.

Figure 2 - Aerial Photograph

McKinley ES Campus Boundary

0 200
Scale (Feet)

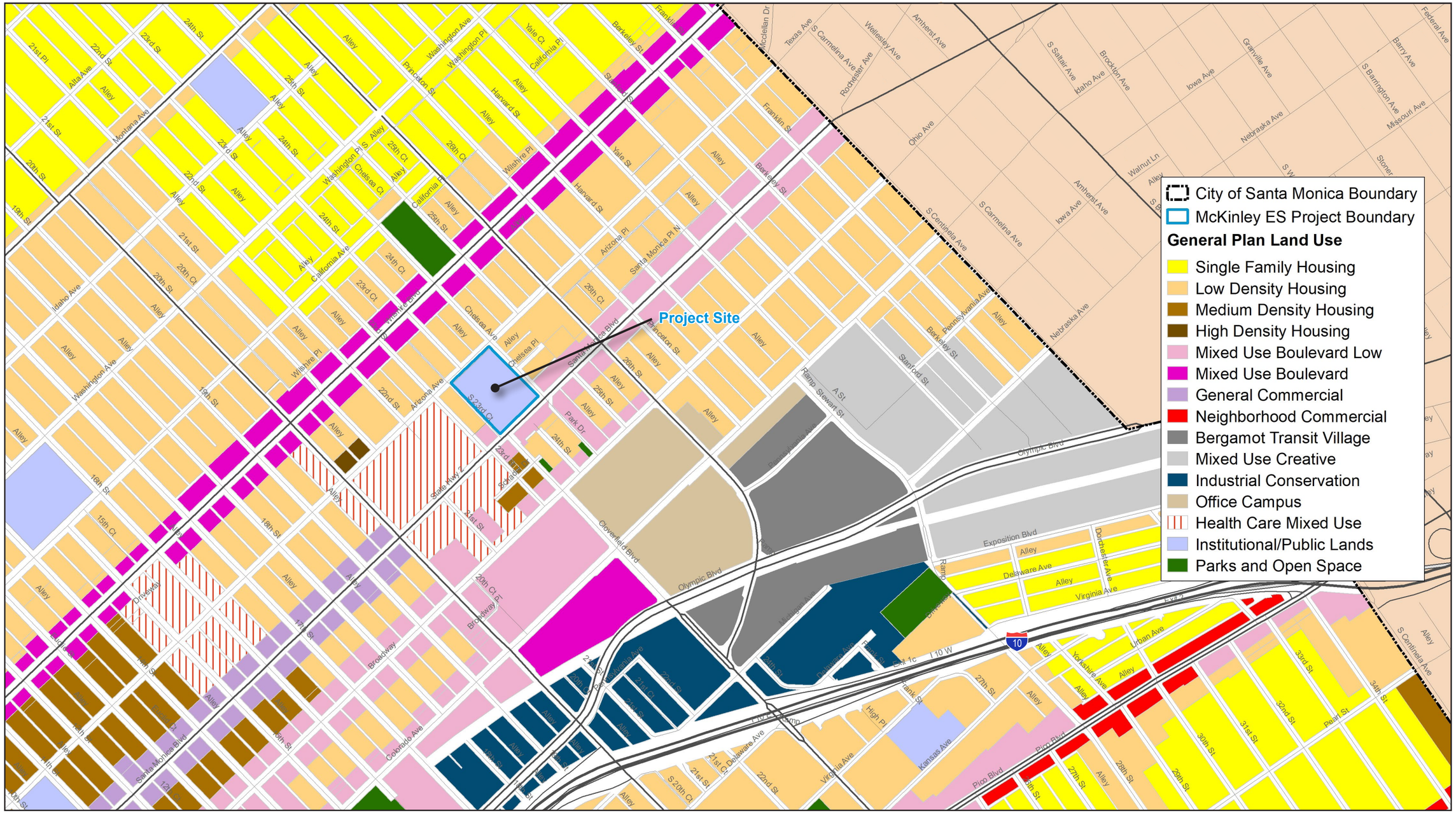
Source: Nearmap, Inc., 2022.

PlaceWorks

2. Environmental Setting

This page intentionally left blank.

Figure 3a - General Plan Land Use

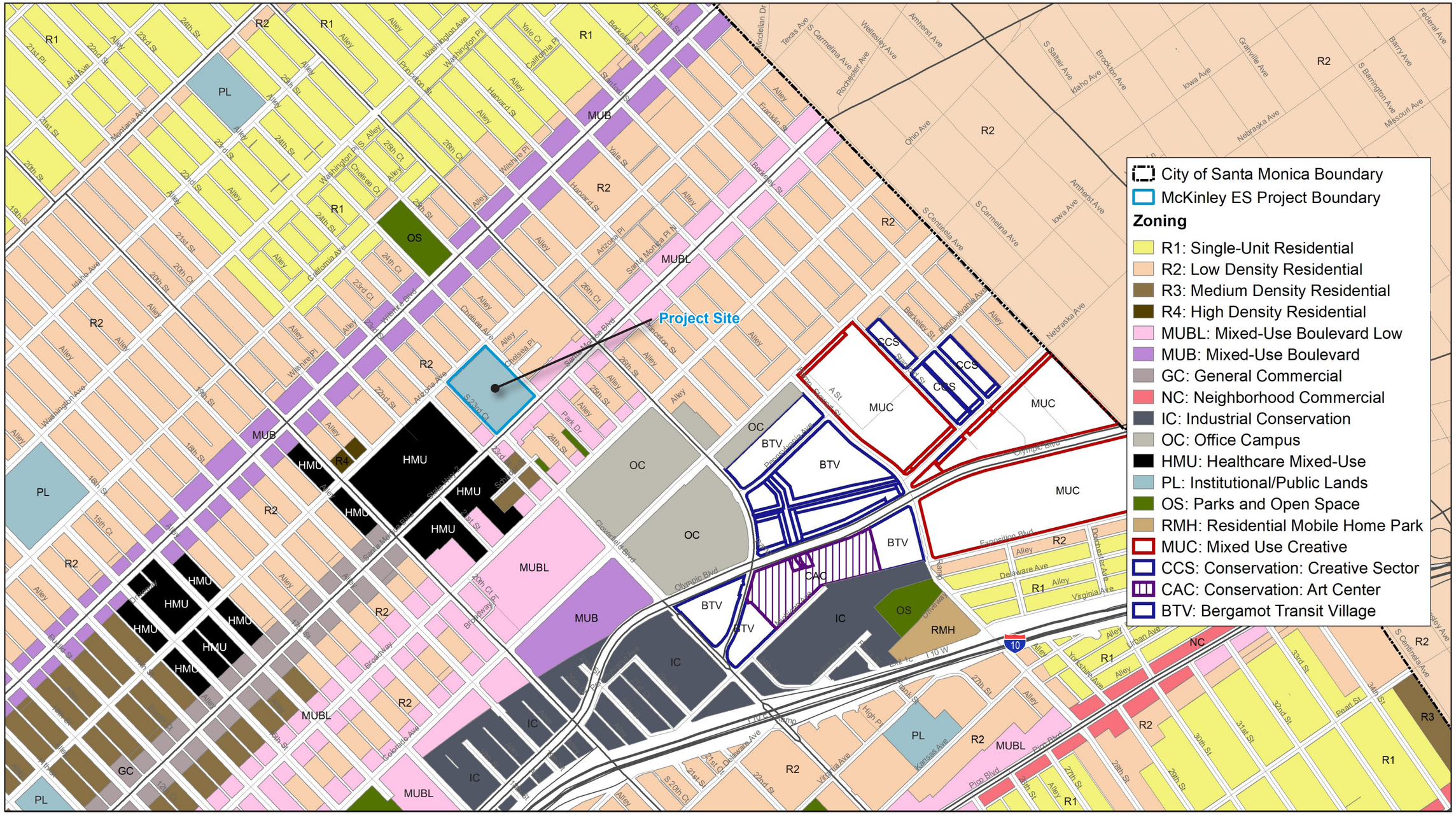


Source: Generated Using ArcMap, Inc.; City of Santa Monica, 2022

2. Environmental Setting

This page intentionally left blank.

Figure 3b - Zoning Designations

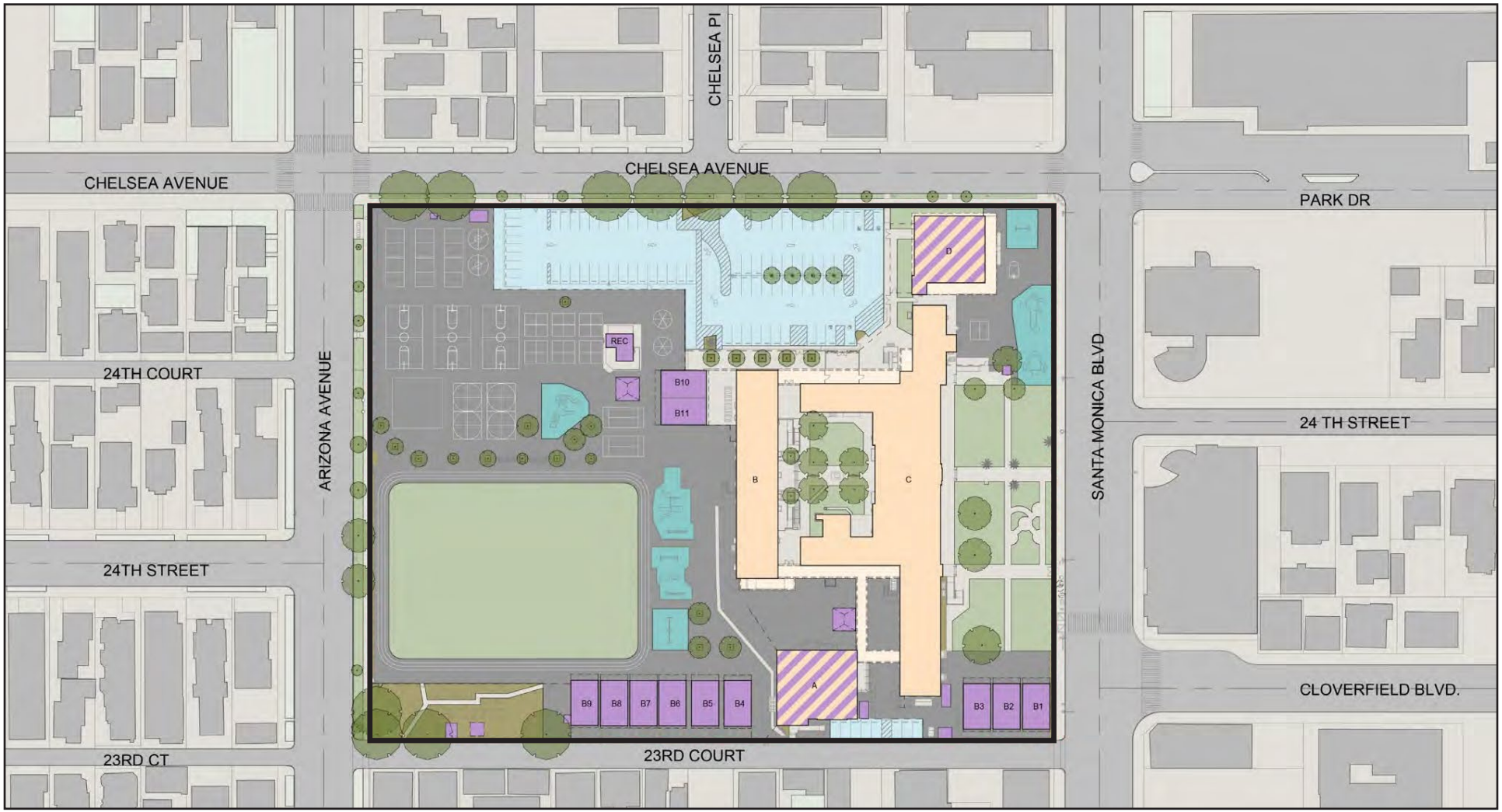


Source: Generated Using ArcMap, Inc.; City of Santa Monica, 2022

2. Environmental Setting

This page intentionally left blank.

Figure 4 - Existing Site Plan



Source: Johnson Favaro, 2022.

2. Environmental Setting

This page intentionally left blank.

Figure 5 - Photos of the Existing Campus

Building B

Building C

Main Courtyard

Existing Parking Lot along Chelsea Avenue

"Story Book Land" Sculpture

Santa Monica Blvd Quad

Source: SMMUSD, 2022.

2. Environmental Setting

This page intentionally left blank.

The campus contains four permanent buildings (Buildings A-D) and multiple modular and portable buildings (B1-B11). The permanent buildings were constructed in an Italian Renaissance Revival style of architecture. The following sections include an architectural description of each building.

Building A (Cafeteria)

Building A (cafeteria) is along 23rd Court in the southwestern part of the campus. It is a one-story, 4,439-square foot building, with a height of 23 feet-8 inches, and contains the school's cafeteria. Building A is connected to Building C via the building's arcade. This arcade extends from the eastern corner to create the West Courtyard.

Building B (Classrooms)

Building B (Classrooms) is in the central portion of the campus immediately north of Building C. The two-story, 13,425-square foot building contains classrooms, with a height of 41 feet-4 inches. Two concrete ramps provide entrance to the first story's south façade. An elevator and connected arcade at the northwest corner of the building provide access to the second story. A metal staircase allows emergency exit from the second story along the north façade.

Building C (Administration/Classrooms/Multipurpose Auditorium)

Building C is in the southern part of the campus immediately south of Building B. Building C consists of a central, two-story, 27,390-square foot building, with a height of 38 feet-6 inches, flanked on both ends by single-story wings. This building contains classrooms, administrative office, and the multipurpose auditorium.

Building D (Preschool)

Building D is in the eastern part of the campus just east of Building C and is rectangular, one-story, 3,796 square foot building, with a height of 11 feet-9 inches. This building contains preschool classrooms. The slightly raised concrete platform is accessible via a ramp.

Santa Monica Boulevard Quad

Situated south of Building C, the open space is traversed by several concrete walkways that historically provided pedestrian access to the original entrance on Santa Monica Boulevard. The setback is generally consistent and is landscaped with grassy lawns and mature trees of various species.

Main Courtyard

The Main Courtyard is surrounded by Building B to the north and Building C to the east, south, and west. The courtyard is landscaped with grassy lawns, mature trees, and concrete patios interspersed with lunch tables, lampposts, and trash receptacles. The "Storybook Land" sculpture is centrally located in the courtyard on a tiered pedestal clad in tile.

West Courtyard

The courtyard is paved and includes picnic tables; it is bordered by Building C to the east and south and by Building A to the west.

Athletic Field

The athletic field was originally a larger lawn that has been sectioned over time as various regions of the campus have been incrementally paved. It is in the northwestern part of the campus.

Learning Garden

A 7,500-square-foot learning garden for the students is at the northwest corner of the campus.

2.4.2 Student Enrollment

Enrollment at McKinley ES has decreased since 2016, from a high of approximately 538 students to 375 in the 2021-2022 school year. The enrollment increased to 407 students in the 2022-2023 school year (see Table 2, *McKinley Elementary School Student Enrollment by Grade Level*).

Table 2 McKinley Elementary School Student Enrollment by Grade Level

Grade	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Transitional Kindergarten	24	48	42	46	21	23	20	18	16	19
Kindergarten	81	54	92	76	69	72	74	50	59	59
1st Grade	83	84	52	90	74	67	73	68	53	63
2nd Grade	85	87	83	58	91	70	62	70	62	54
3rd Grade	63	84	90	82	63	92	67	59	69	76
4th Grade	77	62	88	88	84	62	90	62	57	73
5th Grade	77	80	65	98	86	89	64	81	59	63
Total	**490**	**499**	**512**	**538**	**488**	**475**	**450**	**408**	**375**	**407**

Source: SMMUSD CBEDS 2006-2022.

The McKinley ES student capacity is based on California Department of Education standards the current maximum enrollment capacity at McKinley ES is 814 students. This is a maximum where every 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 is 609 students. However, neither of these maximum capacity numbers are reflective of the way instruction currently occurs nor is anticipated to occur based on actual enrollment trends. Based on the Districtwide Educational Specifications, the current campus should support up to a maximum of 550 students. The Proposed Project would not increase the capacity of the campus capacity but would be designed to support the District's goals and objectives outlined in the Districtwide Education Specifications (SMMUSD 2019) contained within the 2019 SMMUSD Education Master Plan.

2.4.3 School Schedule

School hours would remain the same as its existing hours, from 8:00 a.m. to 3:00 p.m., with staff and students arriving on campus between approximately 7:00 a.m. and 8:00 a.m. and leaving between approximately 3:00 p.m. and 5:00 p.m.

2.4.4 Existing McKinley ES Campus Uses

The campus currently encompasses approximately 6.48 acres (see Table 3, *Existing Campus Land Use*), with a total existing building area of 63,171 square feet, which includes approximately 54,531 square feet of permanent building area and 8,640 square feet of relocatable building area.

Table 3 Existing Campus Land Use

Area	Acres	Percent
Building Footprint	1.09	17
Playground and Fields	2.83	44
Unprogrammed Landscape and Open Space	0.99	15
Pedestrian Circulation	0.73	11
Vehicular Circulation and Parking	0.84	13
Total	**6.48**	**100**

Source: SMMUSD 2023.

The existing campus contains 29 classrooms, which include 2 preschool classrooms, 1 transitional kindergarten classroom, 3 kindergarten classrooms, 3 first-grade classrooms, 3 second-grade classrooms, 3 third-grade classrooms, 3 fourth-grade classrooms, 3 fifth-grade classrooms, and 8 special education classrooms (see Table 4, *Existing Facilities*). The campus also contains classrooms for before/after-school programs, science, art, and music; a multipurpose auditorium; a multipurpose cafeteria/kitchen; and a library.

Table 4 Existing Facilities

Campus Facilities	Quantity
Preschool	2
Transitional Kindergarten	1
Kindergarten	3
1st Grade	3
2nd Grade	3
3rd Grade	3
4th Grade	3
5th Grade	3
Special Education	8
Core Classrooms	**29**
SAP Childcare and Learning Annex	3
Art Classrooms/Flexible Science/Art	1
STEM Classrooms/Maker Lab	1
Flexible Music	1

2. Environmental Setting

Table 4 Existing Facilities

Campus Facilities	Quantity
Multipurposed Auditorium	1
Multipurpose Culinary/Cafeteria	1
Library	1
Specialized/Flexible Rooms	**9**

Source: SMMUSD 2023.

In addition, the 6.48-acre campus includes approximately 2.83 acres of athletic fields, courts, and playgrounds, as shown in Table 5, *Existing Recreational Facilities*. The existing recreational area includes a natural turf field and perimeter track adjacent to Arizona Avenue, and a mixture of hard court and resilient play areas with equipment make up the remainder of the sizable playgrounds occupying the north half of campus. Wall ball courts situated in the northeast corner are hard to surveil across the play yards. Additionally, a preschool and kindergarten play yard made of hard top and resilient surfacing and equipment allows separate play for younger children.

Table 5 Existing Recreational Facilities

Area	Acres
Older Children's Track and Field	0.94
Older Children's Playground	1.52
Playground equipment on resilient surface	0.03
Playground equipment on resilient surface	0.04
Playground equipment on resilient surface	0.03
Playground equipment on resilient surface	0.03
Shared Pre-K & Kindergarten playground equipment on resilient surface	0.02
Shared Pre-K & Kindergarten playground equipment on resilient surface	0.06
Shared Pre-K & kindergarten playground area	0.16
Total	**2.83**

Source: SMMUSD 2023.

The existing athletic facilities at the school are available for community use through the Civic Center Act and joint use agreement between the District and the City. When the school facilities are not in use and are not scheduled for school-sponsored or other District-related events, certain community organizations and members are permitted to use school facilities for their events by obtaining a Civic Center Permit from the SMMUSD. Permitted events may include community and/or city use of the playfields, common areas, and classrooms, as permitted in the 2022 "Master Facility Use Agreements with the Santa Monica-Malibu Unified School" (City of Santa Monica 2022a).

Operation of the school facilities for community use typically occur outside normal school operating hours, generally after 3:00 pm on weekdays, and after 8:00 a.m. on Saturdays and Sundays. Indoor activities are typically completed by 9:00 p.m. but would be permitted until 10 p.m., and all outdoor activities would be completed by sunset, on both weekdays and weekends. Parking for Civic Center uses would be provided in the school's on-site surface parking lots. These occasional uses would not be changed with the Proposed Project.

2.5 CAMPUS HISTORY

The original campus was constructed in 1905 about one-quarter mile northwest of its present-day location and was rebuilt in 1922 at its current location. The new campus was designed by Los Angeles master architectural firm Allison & Allison in the Italian Renaissance Revival style of architecture. In 1933 a magnitude 6.4 earthquake in Long Beach caused extensive damage throughout the city of Long Beach and surrounding communities. Following the earthquake, the architectural firm of Parkinson & Parkinson rehabilitated the damaged school from 1935 to 1937.

Although construction ceased during the World War II years (1939 to 1945), development and expansion of the campus resumed shortly thereafter to meet increased demand. Subsequent construction at the school in the post-war era (1945 to 1968) was not completed as part of long-term planning efforts. In 1951, architect Joe M. Estep designed the cafeteria building to the west of the main building. The cafeteria was connected via two arcades, thereby creating the smaller West Courtyard. In 1973, the architectural firm of Powell, Morgridge, Richards & Coghlan remodeled the campus. This work included alterations to the main entrance and the replacement of windows and doors. In 1973, Building D was constructed as the preschool for the campus (see Figure 4and Figure 5).

The existing campus has four permanent buildings as well as athletic facilities, open spaces, and artwork. Building A (Cafeteria) was constructed in 1951 and designed by Joe M. Estep. Building B (Classrooms Building) was constructed in 1923 and designed by Allison & Allison. The building was rehabilitated by Parkinson & Parkinson in 1935 to 1937 and by Powell, Morgridge, Richards & Coghlan in 1973. Building C (Classrooms/Kindergarten) was constructed in 1923 and designed by Allison & Allison. The building was expanded by Allison & Allison in 1929 and 1930. It was rehabilitated by Parkinson & Parkinson in 1935 to 1937 and by Powell, Morgridge, Richards & Coghlan in 1973. An addition was added to the west wing facing the courtyard circa 1958. The building was again altered in 1999. Building D (preschool) was constructed circa 1973.

The Santa Monica Boulevard Quad that is south of Building C along Santa Monica Boulevard dates to the beginnings of the campus (circa 1923) and has been modified over time; the Main Courtyard also dates to the early development of the campus (circa 1923). The West Courtyard dates to circa 1951 and was created by the arcade built at that time.

The Main Courtyard of the campus also includes "Storybook Land," a four-foot-tall, cast stone sculpture that depicts two children reading a book and was created by artist Stefan De Vriedt in 1936. The sculpture was funded by the Works Progress Administration (WPA). In 1937, a bronze plaque was installed by the WPA in Building C after its reconstruction. As shown in Table 1, Buildings B and C were constructed in the 1920's; Building A was constructed in the 1950's; and Building D was constructed in the 1970's.

2.5.1 Historical Resources

In February 2021, the District adopted Board Policy (BP) 7113 and the accompanying Administrative Regulation (AR) 7113, which were developed to identify and clarify treatment of historical resources present

2. Environmental Setting

on properties within the District's jurisdiction. The Board Policy and Administrative Regulation require completion of a historic resources inventory (HRI) of a school campus prior to approval of either a master plan or design of a school facilities project at that campus. In 2022, the District commissioned an HRI of the McKinley Elementary School campus. The purpose of the HRI is to review the existing buildings, structures, and features located at the school; review previous evaluations of the school through historic survey, environmental review, or other official actions; identify and evaluate any potential historic resources within the school, including their character-defining features; and review the required consideration of historic resources within the school under the California Environmental Quality Act (CEQA). This campus HRI was prepared in conformance with BP and AR 7113 as they relate to McKinley ES.

As part of the HRI, the buildings and features of the McKinley ES campus were considered collectively for their potential eligibility for listing in the National Register, the California Register, and/or listing at the local level as a historic district. Based on visual observation of the campus, research of primary and secondary sources, and an analysis of the eligibility criteria for listing at the federal, state, and local levels, the HRI identified a potential historic district at McKinley ES that is eligible for listing in the California Register of Historical Resources and for designation as a City of Santa Monica historic district[1] (HRG 2022). The following are identified as contributing elements of the historic district: Buildings B and C, two site features (Santa Monica Boulevard Quad and Main Courtyard), and two additional features ("Storybook Land" Sculpture and WPA Bronze Plaque) with a period of significance from 1923 to 1937 (see Table 6, *Features in the Historic District* and Figure 6, *Historic District Boundary*). All other buildings and features on-site were determined ineligible for listing at the federal, state, and local levels (Historic Resources Group 2022). The historic district is further discussed in Section 5.4, Cultural Resources, below. The SMMUSD Board of Education (Board) reviewed the HRIs during the February 7, 2022 Board meeting. The Board provided direction to proceed with the campus plans and to proceed with the design of the first phase of the Proposed Project (SMMUSD 2023).

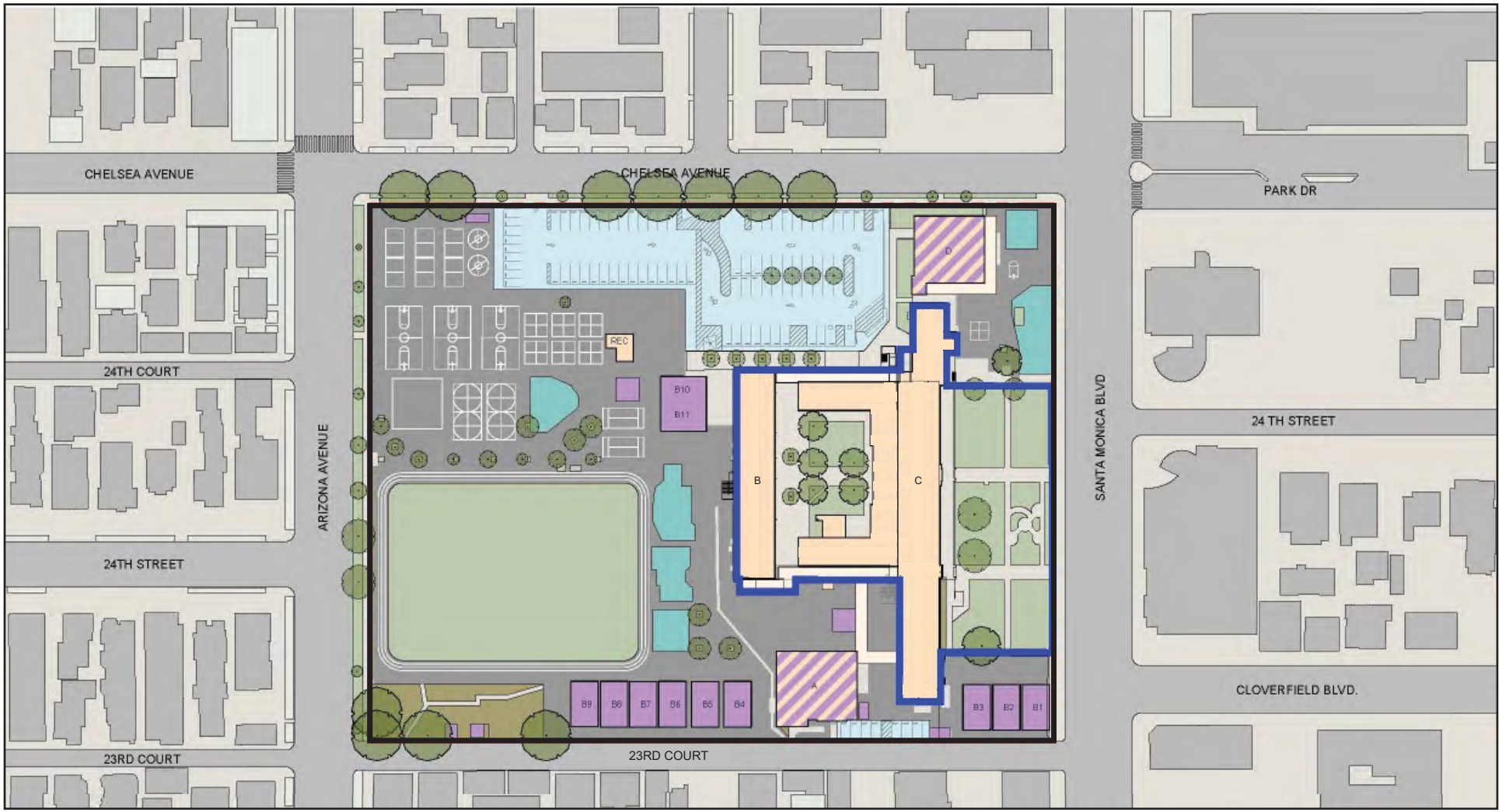
Table 6 Features in the Historic District

Current Feature Name	Year Built	Integrity	Status	Building Style
Buildings				
Building B	1923	Fair	Contributor	Italian Renaissance Revival
Building C	1923	Fair	Contributor	Italian Renaissance Revival
Site Features				
Santa Monica Boulevard Quad	1923	Good	Contributor	N/A
Main Courtyard	1923	Good	Contributor	N/A
Additional Features				
"Storybook Land" Sculpture	1936	Very Good	Contributor	N/A
WPA Bronze Plaque	1937	Very Good	Contributor	N/A

Source: Historic Resources Group 2022.

[1] As governed by Santa Monica Municipal Code Section 9.56.100 (Landmarks and Historic Districts Ordinance)

Figure 6 - Historic District Boundary



Source: Johnson Favaro, 2022.

2. Environmental Setting

This page intentionally left blank.

3. Project Description

3.1 PROPOSED PROJECT DEVELOPMENT

The Proposed Project, which involves implementation of a Campus Master Plan, would be constructed in three phases and would occur over 5.7 acres of the 6.48-acre District-owned campus. Redevelopment and modernization of McKinley ES includes the demolition and removal of some existing structures, renovation of structures to remain, and constriction of two new buildings and outdoor facilities. As listed in Table 7, *Summary of Building Removal and Demolition*, 11 existing portable classrooms (B1 through B11), playground restrooms, one modular building (Building D), and one elevator (serving Building B and C) would be selectively demolished and removed as part of the Proposed Project, for a total of 82,505 square feet of demolition over 3 phases. Figure 7a through 7c, *Proposed Project's Site Plan*, shows ultimate buildout for each phase of the Proposed Project. Each phase of the Proposed Project is dependent on funding availability. Phase 1 is funded, and design is complete.

Table 7 Summary of Building Removal and Demolition

Name	Square Footage
Phase 1	
Eleven Portable Classrooms (B1-B11)	10,560
Playground Restrooms	468
Existing Parking Lot	35,284
Phase 2	
Removal of Elevator that serves Buildings B and C	397
Phase 3	
One Modular Building (Building D)	3,796
Interim Parking Lot	32,000
Total Demolition Square Footage	**82,505**

Source: SMMUSD 2022.

Phase 1

Phase 1 of the Proposed Project would require approximately 11,028 square feet of demolition, including the removal of 11 existing portable classrooms (B1 through B11) and one restroom building located on the playground. Additionally, the Proposed Project would require the removal of the 35,284-square foot parking lot located on the northern portion of the campus along Chelsea Avenue.

Phase 1 of the Proposed Project would include the construction of a new, permanent, 24,410-square-foot, two-story classroom building that would contain eight new elementary classrooms; a new front office; and school support spaces, including outdoor classrooms. As shown in Figure 7, the new classroom building would replace the 11 portable classrooms and would be constructed in the location of the former parking lot. The new

building would connect to Building Cs and B at the second floor with covered walkways, and the new building would create a new west courtyard adjacent to Building C, with ornamental plantings and learning garden.

Phase 1 of the Proposed Project would also include renovation of the existing library within its current location on the eastern wing of Building C. The renovated library would be approximately 1,354 square feet and include new openings in existing walls for doors/windows; new floor framing; new ceiling and casework, upgraded lighting, new electrical, new data systems; and modifications to the heating ventilation and air conditioning (HVAC) system. The expanded library would accommodate 50-60 students, provide sitting and standing position for staff, with visibility and clear lines of sight, and would include multi-purpose and collaborative areas to support presentations, and provide access to tablets for students. The library renovation would not increase the library area.

Phase 1 of the Proposed Project would implement a new drop-off/pick-up queue along Chelsea Avenue. A new interim 32,000-square foot parking lot providing 93 stalls would be near the corner of Chelsea Avenue and Arizona Avenue, with an additional 2 stalls provided on the south side of the new building. The interim parking lot would remain at its proposed location until the implementation of Phase 3 of the Proposed Project. New playground areas totaling 7,000 square feet would be provided in place of the removed portables (B1 through B11)(see Figure 7a, *Proposed Project's Site Plan – Phase 1*).

Phase 2

Phase 2 of the Proposed Project would include the demolition of the existing elevator serving Buildings B and C and stair core serving Building C.

Phase 2 would include an interior renovation of 2,330 square feet of administrative area in Building C. The former location of the front office in Building C would be renovated to provide a new faculty center with a work room, collaborative staff room, six offices, and a room for records. Phase 2 also includes the construction of a new elevator and stair core, and a new 3,500 square foot lunch shelter with lunch tables would be provided along the multipurpose room (Building A) to provide shade for outdoor seating, and a new learning garden to grow edible plants adjacent to the cafeteria. Phase 2 of the Proposed Project would also centralize the elementary playground areas and concentrate them closer to the core of the campus, which would result in a safe and visible play area. The field would be reconfigured to a standard rectangular play field centrally located in the southern portion of the campus. (see Figure 7b, *Proposed Project's Site Plan – Phase 2*).

Phase 3

Phase 3 of the Proposed Project would include the demolition of one preschool classroom modular building (Building D) and removal of the existing learning garden.

A new 26,500-square-foot, two-story transitional kindergarten, kindergarten, and elementary classroom building would be constructed during Phase 3. The new building would be constructed at the location of the interim parking lot adjacent to the new two-story classroom building constructed in Phase 1 (see Figure 7a). Four kindergarten classrooms, one transitional kindergarten class and two preschool classrooms would be

located on the first floor; and four 4th grade classrooms and two Teaming Studios would be located on the second floor, with outdoor classrooms adjacent to all indoor learning spaces.

In Phase 3, the area of the interim parking lot would be reduced to provide a total of 15 stalls for early education, visitors, and American with Disabilities Act (ADA) requirements along the Chelsea Ave drop off/pick up queue, and a new parking lot with 78 parking stalls would be added in the northwest portion of the campus near the corner of Arizona Avenue and 23rd Street. One new parking lot in the western part of the campus would be provided along 23rd Court in place of the former location of the learning garden and portable classrooms B4 through B9. The remaining buildings would remain as is (see Figure 3-7c, *Proposed Project's Site Plan – Phase 3*).

As shown in Table 8, *Summary of Proposed Project Total Development*, the Proposed Project would provide 14 new classrooms, new and reconfigured playfields/playgrounds and parking lots, for a total of 128,464 square feet of building space on the McKinley ES campus. At completion, Proposed Project would result in a total of 33 classrooms, from preschool through fifth grade, including special education, and dedicated outdoor play areas for preschool through kindergarten for a total of 173,718 square feet of building space. New building heights would not exceed 42 feet-8 inches.

Table 8 Summary of Proposed Project's Total Development

Building	Status	Classrooms	Square Footage	Maximum Height
New Construction				
Phase 1				
One New Classroom Building (New Elementary Classrooms and New Front Office and School Support Spaces)	New	8	24,410	42 feet- 8 inches
New Parking Lot (Arizona Avenue/Chelsea Avenue)	New	-	32,000	-
Renovated Library	Existing	-	1,354	No Change
Interim Playground[1]	New	-	7,000	-
Phase 2				
Renovation of Building C	Existing	-	2,330	-
Lunch Shelter along Building A	New	-	3,500	-
New Elevator and Stair core for Building B and C.	New	-	870	-
Reconfigured Playfields and Playgrounds	New	-	7,500	-

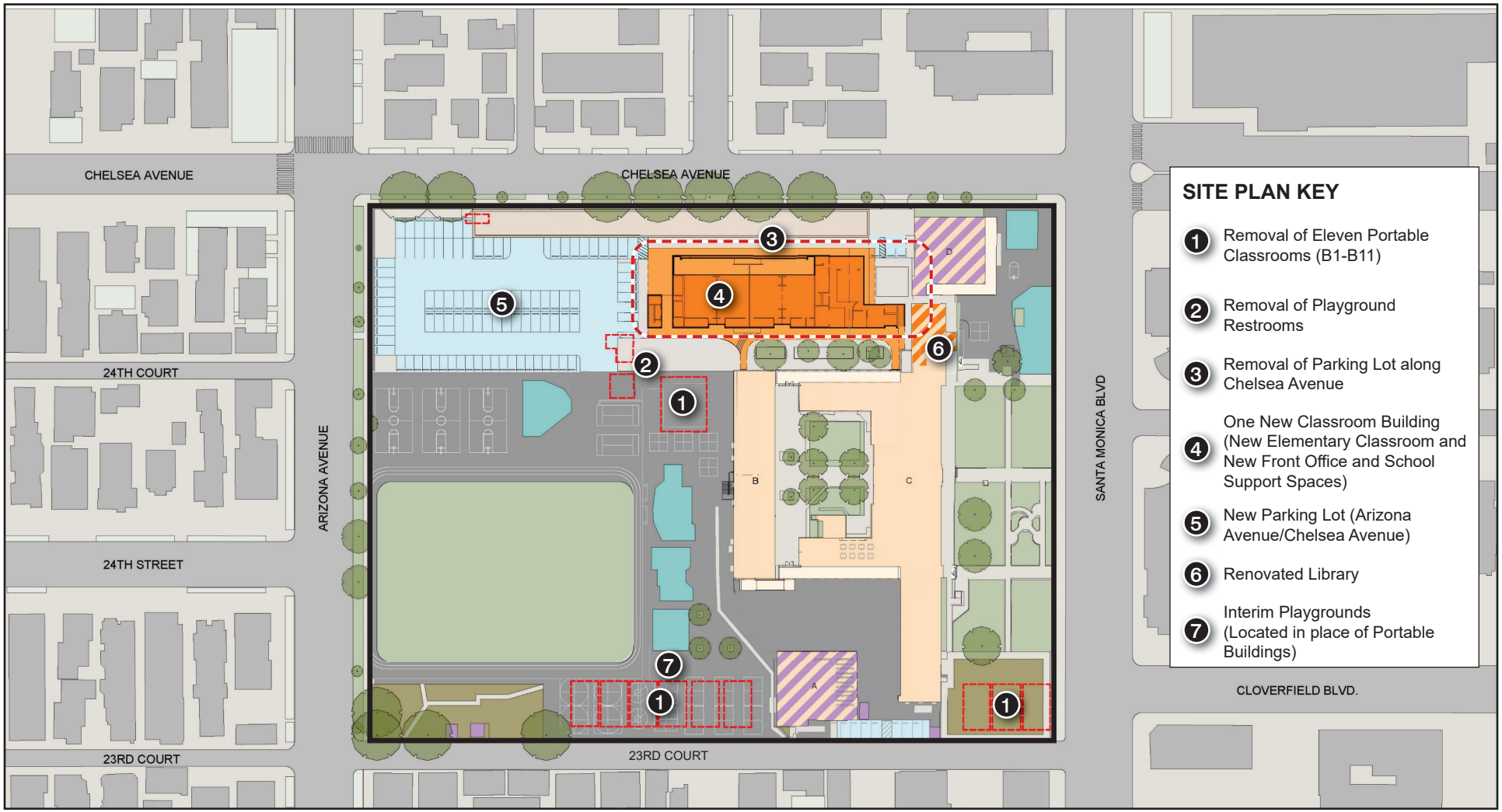
3. Project Description

Table 8 Summary of Proposed Project's Total Development

Building	Status	Classrooms	Square Footage	Maximum Height
Phase 3				
New Two-Story Building for T-K/Kindergarten and Elementary Classrooms	New	6	26,500	42 feet- 8 inches
New Parking Lots (Arizona Avenue/23rd Court)	New	-	23,000	-
Subtotal – New Development		**14**	**128,464**	**-**
Existing Buildings				
Building A	Existing	-	4,439	23 ft-8 in
Building B	Existing	8	13,425	41 ft-4 in
Building C	Existing	11	27,390	38 ft-6 in
Subtotal – Existing Development		**19**	**45,254**	**-**
Total		**33**	**173,718**	**-**

Source: SMMUSD 2022.
1: Interim playground located in place of portable buildings

Figure 7a - Proposed Project Site Plan - Phase 1



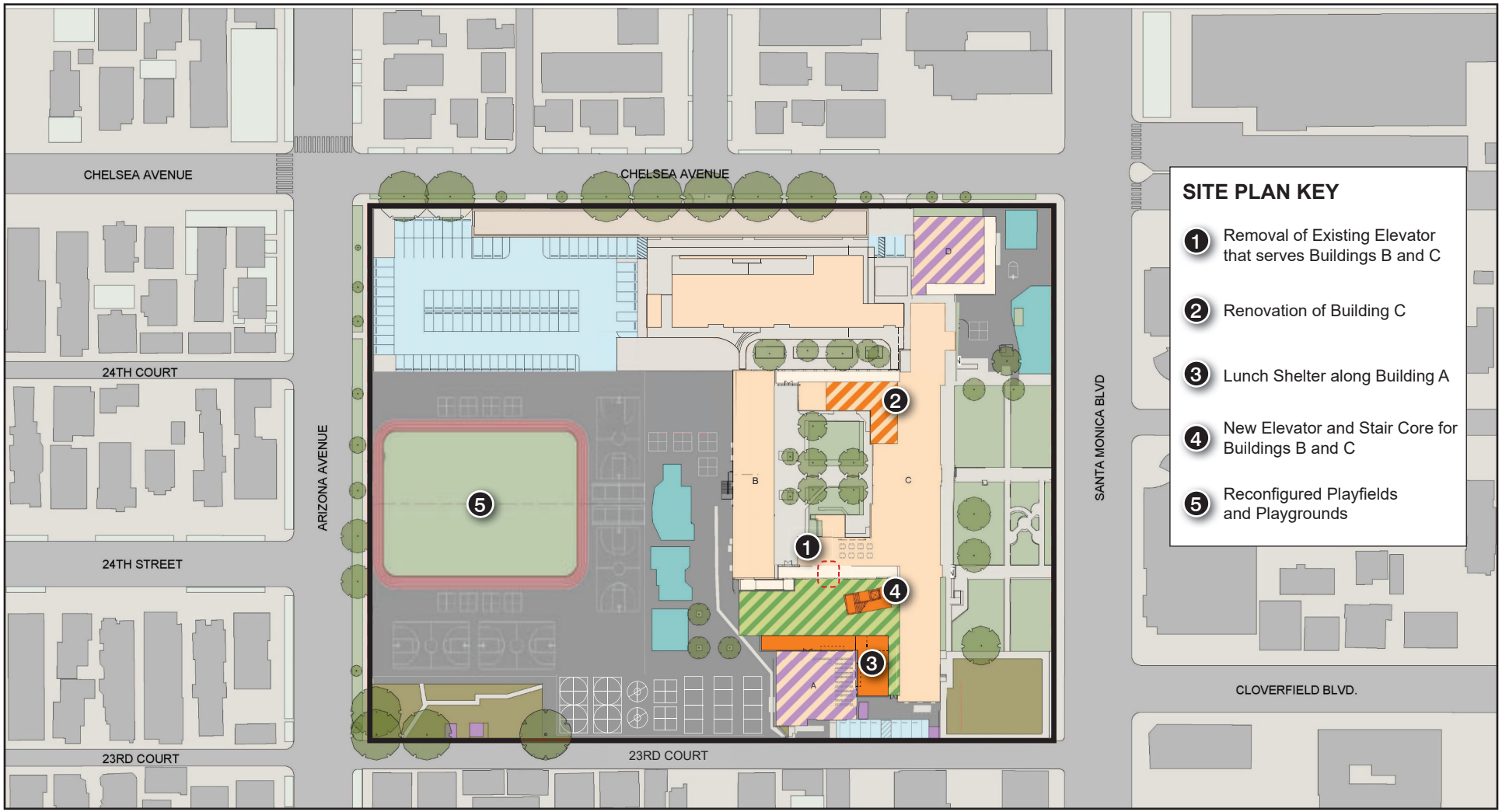
Source: Johnson Favaro, 2022.

PlaceWorks

3. Project Description

This page intentionally left blank.

Figure 7b - Proposed Project Site Plan - Phase 2



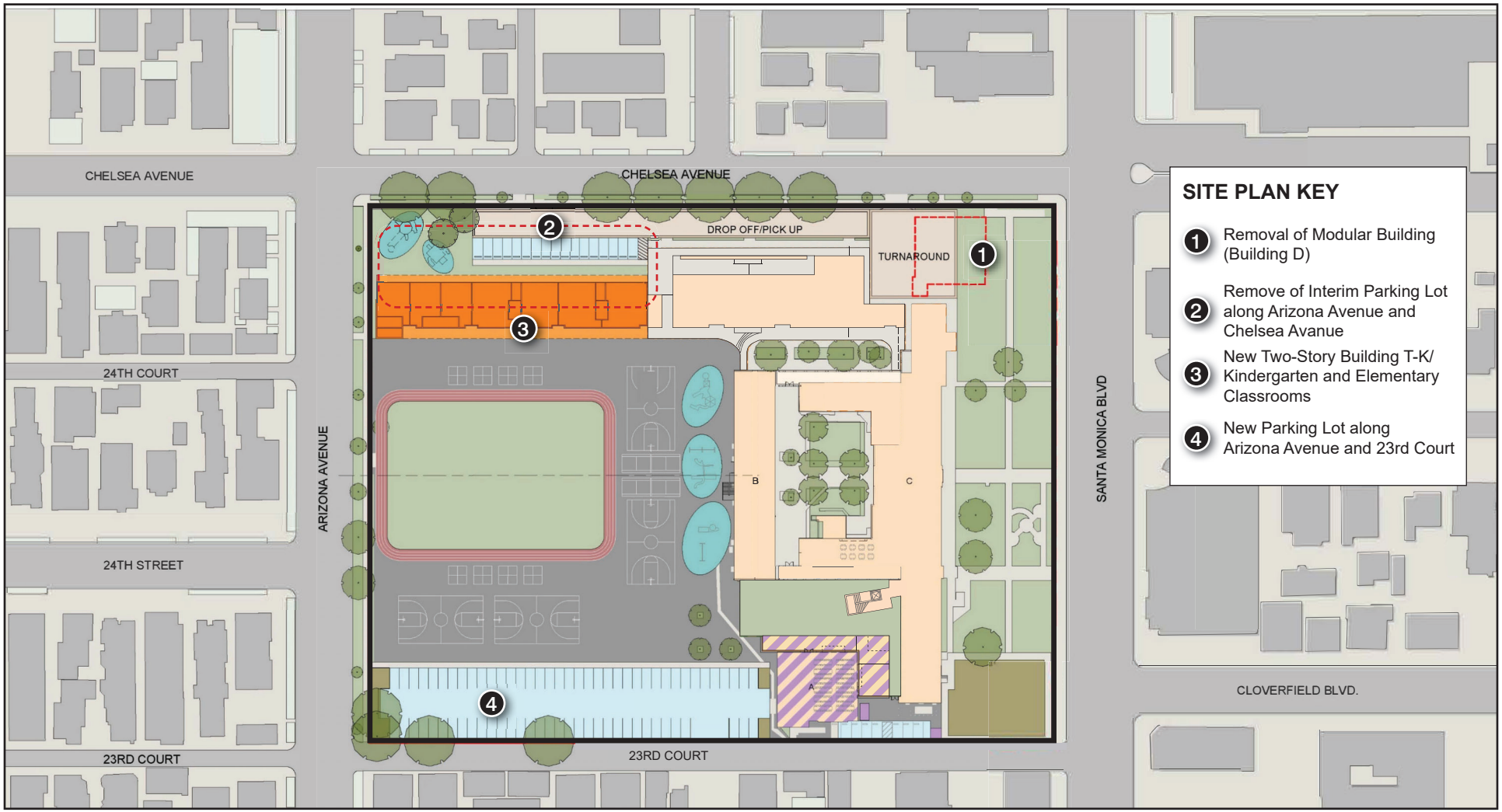
Source: Johnson Favaro, 2022.

PlaceWorks

3. Project Description

This page intentionally left blank.

Figure 7c - Proposed Project Site Plan - Phase 3



Source: Johnson Favaro, 2022.

PlaceWorks

3. Project Description

This page intentionally left blank.

3.1.2 Outdoor Facilities

The current configuration of the campus puts playground areas away from the heart of campus, limiting surveillance and supervision capability. The playground configuration creates 'blind spots' for supervision of the students, and it is not visible from the core campus. The preschool play areas are currently located adjacent to Building D with a chain link fence separating the play yards from Chelsea Avenue and Santa Monica Boulevard. Therefore, the current playground configuration compromises student safety and the staff's ability to control student activity.

As part of the Proposed Project, the early education and kindergarten play yard would be immediately adjacent to the early education classroom building separated from the elementary playgrounds for greater safety. The elementary playground areas would be centralized and concentrated closer to the core of the campus, which would result in a safe and visible play area. The field would be reconfigured to a standard rectangular play field centrally located in the northern portion of the campus. The overall U-shaped configuration would provide most of the security enclosure with most outdoor spaces at the center of campus.

3.1.3 Site Access, Circulation, and Parking

Currently, site access is provided from Santa Monica Boulevard and along Chelsea Avenue. Building C faces Santa Monica Boulevard, and its architecture still signals that this is the front of school; however, because now most children arrive by automobile and are dropped off and picked up, and because of the busy arterial nature of Santa Monica Boulevard, the front of school has migrated to the Chelsea Avenue frontage.

Both staff parking, early education parking, and student drop-off and pick-up are through the Chelsea Avenue lot, which creates inefficiency and safety issues. A staff parking lot with 82 parking stalls is on the eastern side of the campus, adjacent to the existing playground and Buildings B, C, and D; it is accessed from Chelsea Avenue. Additionally, one small parking lot with eight parking spaces is adjacent to Building A, near the corner of 23rd Court and Santa Monica Boulevard, and service and deliveries occur separately and appropriately along 23rd Court, a city alley backing up to residential garages

Main site access would remain along Chelsea Avenue after implementation of the Proposed Project. The Proposed Project would include a new early education/visitor parking lot with 15 parking stalls on Chelsea Avenue that would include an off-street lane for drop-off/pick-up and an arrival court east of the existing Building C. The existing lot in the eastern portion of the campus would be removed. One new parking lot in the western part of the campus would be provided along 23rd Court. The parking lot would include approximately 78 parking stalls and would provide staff and after-hours/weekend community parking. It would also retain 7 existing stalls along 23rd Court. Therefore, the Proposed Project would increase parking on the existing campus from 90 to 100 parking spaces.

Emergency vehicle access would continue to be provided on all four sides of campus. Additionally, access would be provided from the arrival court adjacent to Chelsea Avenue and the west parking lot, and truck access is afforded at the center of campus via Arizona Avenue and the playground areas.

3.1.4 Pedestrian Access

As described previously, the main pedestrian and vehicle entrance to the school would be along Chelsea Avenue, which would include a new arrival court for student pick-up and drop-off; additionally, pedestrian entry to the campus would remain along Santa Monica Boulevard at the front of campus for access to Building C. All classrooms on the ground and second floors would be connected via covered outdoor walkways on the inward-facing side of the east and west classroom wings. The preschool, transitional kindergarten, and kindergarten classrooms would provide separate dedicated entrances with dedicated parking for parents to walk children into class, and a dedicated reception and office area required near drop-off/pick-up. Special education classrooms would provide access to dedicated drop-off/pick-up to accommodate buses; adjacency to parking (for instructors, aides, and volunteers); easy access to general classrooms, multipurpose room, library, and other daily use programs; proximity to administrative services, including nurse, flex administration office areas, psychology, speech therapy, and adjacency to culinary cafe for integration with the rest of the student body.

Circulation within and around Building C would be restored and improved with outdoor covered walkways and classrooms at the perimeter of the main courtyard and covered outdoor walkways connecting the auditorium and multipurpose culinary café (Building A) across the new south courtyard.

3.1.5 Safety and Security

Most of the campus is secured with buildings in which all circulation occurs on the inward-facing sides of its east and west wings. Walls secure the enclosure of the early education and kindergarten play area at the northeast corner of campus. Perimeter fences and walls secure the south courtyard, the learning garden, and the north campus field and playground areas. Parking lots are secured with vehicle gates at each of the two locations east and west, and after-hours community access is afforded via gates on the north and west sides of campus.

3.1.6 Landscaping Improvements

Perimeter landscaping and street trees would be provided at Arizona Avenue. Early education, kindergarten, and elementary play areas, as well as the playground areas and corners of the field, would include multiple trees. New trees would be placed in the new learning garden and east courtyard created between the new classroom building and Building C's north wing. Existing mature trees in the main courtyard and at the northwest corner of campus would be maintained.

3.1.7 Sustainability Features

All new buildings developed under the Proposed Project would be designed using applicable green building practices, including those of the most current Building Energy Efficiency Standards (24 CCR Part 6) and California Green Building Standards Code (CALGreen; 24 CCR Part 11). The Proposed Project would be developed with High Performance Schools (CHPS) Green Building Resolution Standards, and would be consistent with the energy-related goals and actions of the Districtwide Plan for Sustainability (SMMUSD 2019). As part of implementation of the Strategic Energy Management Plan, the District would continue to install occupancy sensors in all classrooms and offices to allow lights to be shut off when unoccupied; establish

lighting- and equipment-efficiency standards for all new equipment that meet or exceed Title 24 standards, where feasible; install Title 24–compliant or better HVAC units for District sites that require cooling; install wireless thermostats for new HVAC units to allow District to implement energy saving strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling; install energy management systems (EMS) for remaining school sites to allow control at both the site and District level; and connect wireless thermostats to the EMS system. Additional bike racks would be installed to accommodate at least 10 percent of regular building occupants, with a goal to reach 20 percent capacity by 2030.

3.1.8 Utilities

Utility improvements necessary to serve the proposed buildings and modernization would be constructed. The future on-site utilities would connect to existing facilities serving the campus. The Proposed Project would only connect to existing utilities, and no utility expansion would be required.

Electrical

Electrical utilities for the Proposed Project would connect to the existing electrical lines within the McKinley ES campus, including an existing power pole located on the northeastern corner of the campus, and one electrical power pole located on the southeastern corner of the campus. Additionally, one electrical line re-route may be required on the northern boundary of the campus, along Chelsea Avenue. In-depth analysis would be performed to determine necessary improvements for future phases of the Proposed Project.

Sewer

The existing campus has several points of connection to public sewer mains. Sewer mains generally run north to south on along Santa Monica Boulevard onto Chelsea Avenue and 23rd Court (alley). In-depth analysis would be performed to determine necessary improvements for future phases of the Proposed Project.

Water

The Proposed Project would need to reconnect to existing downspouts on the eastern and southwestern boundaries of the campus. Additionally, secondary SD main routing will be shown once the location and depths are verified. In-depth analysis would be performed to determine necessary improvements for future phases of the Proposed Project.

3.2 PROJECT CONSTRUCTION

The Proposed Project would be constructed in three phases, with construction activities for Phase 1 anticipated to start in the summer 2023, and construction activities for Phase 2 and 3 anticipated to start in summer 2025. The construction for Phase 1 would occur over approximately 18 months and include the following activities: grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, landscaping, and parking lot improvements. The District would request a 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 am to 6:00 pm on weekdays and 9:00 am to

3. Project Description

5:00 pm on Saturday; and prohibits construction on Sundays and holidays. However, the District intends on obtaining the After-Hours Construction Permit, which would allow Proposed Project construction to begin at 7 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. As required under the After-Hours Construction Permit, the District would need to provide one sign posting along the street frontage of each construction area and notifications to neighbors within a 500-foot radius of construction activities. The notifications must include a description of the activities covered under the After-Hours Construction Permit 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 4.12.1.110 and any allowances made by the City under the After-Hours Construction Permit.

School operation would continue during construction as under current conditions, and students would occupy existing buildings on the McKinley ES campus during construction activities. Table 9, *Proposed Project's Phasing*, provides details for each construction phase, including timing, amount of demolition, new construction, and infrastructure improvements for each phase.

Table 9 Proposed Project's Phasing

Phase	Demolition	Demolition Square Footage	New Construction	New Building Square Footage	Timeline
1	• Eleven Portable Classrooms (B1-B11) • Playground Restrooms • Existing Parking Lot	46,312	• One New Classroom Building (New Elementary Classrooms and New Front Office and School Support Spaces) • New Parking Lot (Arizona Avenue/Chelsea Avenue) • Renovated Library • New Playgrounds	72,264	Summer 2023 (18 months)
2	• Removal of Elevator that serves Buildings B and C	397	• Renovation of Building C • Lunch Shelter along Building A • New Elevator and Stair core for Buildings B and C • New Playfields and Playgrounds	6,700	Summer 2025 (18 months)
3	• One Modular Building (Building D) • Interim Parking Lot	35,796	• New Two-Story Building for T-K/Kindergarten and Elementary Classrooms • New Parking Lots (Arizona Avenue/23rd Court and Chelsea Avenue)	49,500	Summer 2028 (21 months)

Source: SMMUSD 2022.

3.2.1 Construction Phasing

The Proposed Project would be developed in three phases over approximately four years. Phase 1 is funded, and Phase 2 and 3 would depend on funding availability. The Proposed Project's activities occurring in each phase are described below.

Phase 1

Phase 1 of the Proposed Project would include the removal of 11 portable classrooms and playground restrooms. Phase 1 would develop eight new classrooms in a new building, a new front office and school support spaces, a new parking lot, and new drop-off/pick-up areas. The existing library would be renovated as part of Phase 1.

Phase 2

Phase 2 of the Proposed Project would include renovation of building C to provide a new faculty center, new lunch shelter, and new exit stairs and elevator.

Phase 3

Phase 3 of the Proposed Project would include removal of the modular preschool classroom building, removal of the existing learning garden, and removal of the interim parking lot. The new two-story transitional kindergarten/kindergarten elementary classroom building and new parking on the northwest side of the campus would be included in Phase 3.

3.2.2 Construction Grading

Excavation would result in approximately 7,900 cubic yards of cut and fill throughout all three phases of the Proposed Project, as shown in Table 10, *Proposed Project Cut/Fill by Phase*, and no imported soils would be necessary.

Table 10 Proposed Project's Cut/Fill by Phase

Phase	Cut (cy)	Fill (cy)	Project Phase Total (cy)
1	3,700	3,700	0
2	1,700	1,700	0
3	2,500	2,500	0
Total	**7,900**	**7,900**	**0**

Source: SMMUSD 2022

3.2.3 Construction Traffic

Construction of the Proposed Project would temporarily generate additional traffic on the existing area roadway network. 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 drop-off or pick-up times. As described in Section 3.2, *Project Construction*, above, the District intends to obtain and After-Hours Construction Permit, which would allow Proposed Project construction from to begin at 7:00 a.m., instead of 8:00 a.m. The earlier arrival of the contractor would allow them to be within the work area prior to student arrival/drop-off, which would improve safety and reduce traffic congestion during construction activities. Additionally, 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.

3.2.4 Construction Staging

The limits of construction staging for each phase of the Proposed Project would be minimal and confined to each phase area. Additionally, a designated area for stockpiling activities would be available within the campus. This would serve as a meeting point for hauling operations and coordination with trucking entry, turn around, and exit.

3.3 REQUIRED PERMITS AND APPROVALS

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

3.3.1 Lead Agency Approval

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

3.3.2 Other Required Permits and Approvals

A public agency other than the lead agency that has discretionary approval power over a part of a project is known as a "responsible agency," defined by CEQA Guidelines section 15381. A state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California is known as a "trustee agency," defined by CEQA Guidelines section 15386. The Proposed Project would not require approval from a Trustee Agency. The responsible agencies and their corresponding approvals for the Proposed Project may include:

State Agencies

Since the District is expected to seek State funding, the California Department of Toxic Substances Control (DTSC) would have to give Site Certification that the campus would not cause unacceptable exposures to hazardous substances.

City Of Santa Monica

- Santa Monica Fire Department and Police Department (Approval of Site Plan for Emergency Access)
- Public Works/Engineering (for grading permit)
- Santa Monica Community Development Department – After-Hours Construction Permit (Permit approval for a permit authorizing construction activity during the times prohibited by the City of Santa Monica Municipal Code section 4.12.110)

3.3.3 Other Reviewing Agency Actions and Approvals

The following agencies would have ministerial review and approvals over the Proposed Project:

- Division of the State Architect (Approval of Construction Drawings)
- Los Angeles Regional Water Quality Control Board (RWQCB) (issuance of waste discharge requirements)
- South Coast Air Quality Management District (SCAQMD)

3. Project Description

This page intentionally left blank.

4. Environmental Checklist

4.1 PROJECT INFORMATION

1. **Project Title:** McKinley Elementary School Campus Master Plan Project

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

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

4. **Project Location:** The McKinley ES campus is located at 2401 Santa Monica Boulevard (Assessor's Parcel Number [APN] 4276-023-900) in the Mid-City neighborhood of the city of Santa Monica, Los Angeles County, California. The campus consists of a 6.48-acre rectangular parcel that includes the existing McKinley ES campus and is entirely District-owned . The campus is approximately 0.60 mile north of Interstate 10 (I-10), 2.0 miles east of the Pacific Coast Highway (PCH) and Santa Monica State Beach, and is bounded by Santa Monica Boulevard to the southeast, Chelsea Avenue to the northeast, Arizona Avenue to the northwest, and 23rd Court (alley) to the southwest. McKinley ES is surrounded by low-density residential neighborhoods immediately to the north, west, and south. Commercial uses are to the southeast and southwest, and medical offices are to the south across Santa Monica Boulevard. Providence Saint John's Health Center consists of midrise buildings to the west across 23rd Court.

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

6. **General Plan Designation:** Institutional/Public Lands

7. **Zoning:** Institutional/Public Lands (PL)

8. **Description of Project:** The Proposed Project would develop new and renovated facilities that would support a project-based learning approach at McKinley ES that would expand instructional strategies currently in place in the District and would address future learning that is flexible, adaptable, and project-centered in its delivery.

9. **Surrounding Land Uses and Setting:** The McKinley ES campus is surrounded by low-density residential neighborhoods immediately to the north, west, and south. Commercial uses are to the southeast and

southwest, and medical offices are to the south across Santa Monica Boulevard. Providence Saint John's Health Center consists of midrise buildings to the west across 23rd Court. The campus is surrounded by properties zoned for Low-Density Residential (R2) and Mixed-Use Boulevard Low (MUBL). The surrounding residential neighborhood streets include Chelsea Avenue, Arizona Avenue, and 23rd Court (alley). Santa Monica Boulevard, a regional transportation corridor, is immediately south of the campus. Wilshire Boulevard is one block north of the campus.

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

- State Agencies
  - Since the District is expected to seek State funding, the California Department of Toxic Substances Control (DTSC) would have to give Site Certification that the campus would not cause unacceptable exposures to hazardous substances.

- City of Santa Monica
  - Santa Monica Fire Department and Police Department (Approval of Site Plan for Emergency Access)
  - Public Works/Engineering (for grading permit)
  - Santa Monica Community Development Department - After-Hours Construction Permit (Permit approval for a permit authorizing construction activity during the times prohibited by the City of Santa Monica Municipal Code section 4.12.110)

- Other Reviewing Agency Actions and Approvals

  The following agencies would have ministerial review and approvals over the Proposed Project:

  - Division of the State Architect (Approval of Construction Drawings)
  - Los Angeles Regional Water Quality Control Board (RWQCB) (Issuance of waste discharge requirements)
  - South Coast Air Quality Management District (SCAQMD)

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

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The Proposed Project would comply with tribal consultation requirements pursuant to Assembly Bill 52 (AB 52). The Gabrieleño Band of Mission Indians – Kizh Nation and Torres Martinez Desert Cahuilla Indians are on the SMMUSD's notification list pursuant to AB 52. The District provided notification letters to these tribes on January 12, 2023 and as of the time of publication of this Initial Study, no response has been received.

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

4.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

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

Carey Upton

Digitally signed by Carey Upton
DN: cn=Carey Upton, o=Santa Monica - Malibu Unified School District, ou=Chief Operations Officer, email=cupton@smmusd.org, c=US
Date: 2023.01.10 14:07:17 -08'00'

1/10/2023

Signature *Date*

Carey Upton, Chief Operations Officer

4.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

4. Environmental Checklist

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

9. The explanation of each issue should identify:

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

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

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

4. Environmental Checklist

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

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

4. Environmental Checklist

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

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

4. Environmental Checklist

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

5. Environmental Analysis

Section 4 provided a checklist of environmental impacts. This Section provides an evaluation of the impact categories and questions contained in the checklist and determines whether there is the potential for environmental impacts that should be further analyzed in an EIR.

5.1 AESTHETICS

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

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

Less Than Significant Impact. Scenic vistas are panoramic views of features such as mountains, forests, the ocean, or urban skylines. The City's scenic resources include the Santa Monica State Beach, the Pacific Ocean, Santa Monica Canyon, the Santa Monica Mountains National Recreational Area, Marine Park, and the bluffs overlooking the beach (City of Santa Monica 2015). The City's scenic vistas can be characterized as hillside areas south of Ocean Park Boulevard, Palisades Park, Hotchkiss Park, and the east-west streets from the beach to Ocean Avenue. The closest scenic vista to the campus is the hillsides south of Ocean Park Boulevard approximately 1.4 miles away. There are no protected or designated scenic vistas or views in the Proposed Project's vicinity, and the Proposed Project would not obscure any scenic vistas.

The campus and surrounding area lack significant topography and are developed with urban land uses. The campus is fully developed with an existing elementary school campus, playgrounds, on-site parking, and ancillary educational uses. The Santa Monica Mountains, located about five miles north of the Project Site, are partially visible in the background from the Project Site and surrounding area. The Proposed Project's elements, including the new two-story classroom building, would be visible from the surrounding neighborhood; however, the new development would not degrade background views of the Santa Monica Mountains. Implementation of the Proposed Project would not result in the obstruction or degradation of existing scenic views. Therefore, the Proposed Project's impacts on scenic vistas are less than significant, and this issue will not be further analyzed in the EIR.

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

No Impact. The closest designated state scenic highway is Route 27 (designated in March 2017), approximately 5.8 miles northwest of the campus. The nearest eligible designated state scenic highway is Pacific Coast Highway (PCH), located 1.7 miles west of the campus (Caltrans 2019). The Proposed Project would not be visible from a scenic highway, and would not result in changes to existing uses, and construction would remain within the campus. Therefore, the Proposed Project would not damage scenic resources within a state scenic highway. No impacts would occur, and this impact will not be further analyzed in the EIR.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. The McKinley ES campus contains an existing developed elementary school campus. It is surrounded by adjacent residential uses and qualifies as an "urbanized area."[2] The Proposed Project includes the removal of 11 existing portable classrooms (B1 through B11), playground restrooms, one modular building (Building D), and one elevator (serving Building B and C) would be selectively demolished and removed. The Proposed Project would reconstruct and modernized the school and would not conflict with the Institutional zoning or regulations governing scenic quality. The new buildings could differ in scale, mass, density, and character. Therefore, the Proposed Project could potentially result in the degradation of the visual character and quality of public views of the campus and its surroundings. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

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

Potentially Significant Impact. The two major causes of light pollution in the campus area spill light and glare from existing sources of light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against (or reflects off) a dark background or shiny surface. Existing sources of light on the campus include light emanating from building interiors, building and security lights, and parking lot lights. The campus is located within a residential area with sensitive receptors to increases in lighting or glare. Implementation of the Proposed Project would result in new development (i.e., new buildings, parking lots) with associated lighting and structures that could affect the surrounding sensitive receptors. Therefore, new sources of light and glare could result in adverse impacts to day- and nighttime views. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

5.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts on agriculture and farmland are significant environmental effects, lead agencies may refer to the California Important Farmland Finder Map prepared by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP), updated in 2022. The FMMP identifies and maps significant farmland. Farmland is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service. The DOC manages the Williamson Act Contract Land Map showing William Act Contracts, updated in 2017.

[2] Public Resources Code Section 21071/CEQA Guidelines 15191(m)(1) for an incorporated city "Urbanized area" means the city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. City of Santa Monica has a population of about 91,000 and the adjacent City of Los Angeles has a population of about 3,850,000.

Would the project:

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

No Impact. The Proposed Project would be developed on an existing elementary school campus. The campus is identified as Urban Built-Up Land and is not identified as an area of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2022a). The campus is adjacent to a residential area and is not located adjacent to areas designated as unique farmland, prime farmland, or farmland of statewide importance; thus, the Proposed Project would not physically impact nor alter the use of agricultural fields. Therefore, the Proposed Project would not alter any farmland resources, and no impacts would occur. This issue will not be further analyzed in the EIR.

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

No Impact. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The campus is not subject to a Williamson Act contract, and the existing zoning is PL (Institutional/Public Lands). The Proposed Project would not conflict with agricultural zoning or a Williamson Act contract (DOC 2017). Therefore, no impact would occur. This issue will not be further analyzed in the EIR.

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

No Impact. The Proposed Project's development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (PRC §12220(g)). Timberland is defined as "land….which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (PRC §4526). The campus is zoned for school use as a public facility and is not zoned for forest land or timberland use. There are no timberland-zoned production areas within the campus or surrounding areas. Therefore, no impacts would occur. This issue will not be further analyzed in the EIR..

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

No Impact. McKinley ES is located on the campus of an existing elementary school within a built-out area, and no significant forest land uses are present onsite nor in the immediate vicinity. Development of the Proposed Project would not require any changes to the existing environment that could result in the conversion of forest land to non-forest use. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The campus is completely developed within a built-out area of the City of Santa Monica, and no significant agricultural uses or forest land uses are present onsite nor in the immediate vicinity. Development of the Proposed Project would not result in the conversion of farmland to nonagricultural uses or forest land to non-forest use. Therefore, no impact would occur. This issue will not be further analyzed in the EIR.

5.3 AIR QUALITY

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

Would the project:

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

Potentially Significant Impact. The campus is in the South Coast Air Basin (SoCAB), which is under the jurisdiction of the South Coast Air Quality Management District (South Coast AQMD). The South Coast AQMD is the air pollution control agency primarily responsible for preparing the Air Quality Management Plan (AQMP) in coordination with the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the US Environmental Protection Agency (EPA). The AQMP is a comprehensive air pollution control program for making progress towards and attaining the established state and federal ambient air quality standards (AAQS). The 2016 AQMP was adopted by the governing board of the South Coast AQMD on March 3, 2017[3]. The Proposed Project would redevelop McKinley ES, which would result in an increase in air pollutant emissions during project-related construction. Because the Proposed Project is not anticipated to result in an increase in student capacity, it is not anticipated to conflict with the AQMP. An air quality assessment will be prepared to analyze the Proposed Project's potential air quality impacts and consistency with the AQMP. This impact will be analyzed in the EIR, and mitigation measures will be identified as necessary.

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

Potentially Significant Impact. The SoCAB is designated nonattainment for Ozone (O_3) and fine particulate matter ($PM_{2.5}$) under the California and National AAQS, nonattainment for particulate matter (PM_{10}) under the California AAQS, and nonattainment for lead under the National AAQS (US EPA 2022). According to South Coast AQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact (South Coast AQMD 1993). Construction activities associated with the Proposed Project would generate a short-term increase in air pollutants that could cumulatively contribute to the nonattainment designations of the SoCAB. Because the Proposed Project is not

[3] South Coast AQMD released a draft updated 2022 AQMP that has not yet been approved.

anticipated to result in an increase in student capacity, it would not result in an increase in emissions during long-term operation of proposed facilities and would not cumulatively contribute to the nonattainment designations within the region. The EIR will further evaluate the Proposed Project's potential to result in a cumulatively considerable net increase in criteria pollutants. Mitigation measures will be identified as necessary.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. Groups of individuals most likely to be affected by air pollution are those most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. The closest sensitive receptors include the on-site student population as well as the adjacent residential uses to the McKinley ES campus along Chelsea Avenue to the northeast, Arizona Avenue to the northwest, and 23rd Court (alley) to the southwest, and Providence Saint John's Health Center to the west.

The Proposed Project's construction activities could potentially expose residents, students, and staff to elevated concentrations of air pollutant emissions from construction equipment exhaust and fugitive dust. An air quality assessment will be prepared to evaluate potential localized impacts from construction of the Proposed Project, including comparison of construction phase NOX, CO, PM10, and PM2.5 against their respective South Coast AQMD localized significance thresholds (LST) as well as a health risk assessment for toxic air contaminants (TACs) associated with construction equipment exhaust. This issue will be further analyzed in the EIR and mitigation measures will be identified as necessary.

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

Less Than Significant Impact. Nuisance odors from land uses in the SoCAB are regulated under South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Proposed Project would modernize and upgrade the

existing McKinley ES and would not result in the types of odors generated by the aforementioned land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities, may generate odors. However, these odors would be low in concentration and temporary. Therefore, overall, any odors generate from construction and operation of the Proposed Project are not expected to affect a substantial number of people. Therefore, impacts would be less than significant. This issue will not be addressed in the EIR.

5.4 BIOLOGICAL RESOURCES

Would the project:

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

No Impact. Sensitive biological resources are habitats or species that have been recognized by federal, state, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. The campus is fully developed, consisting of an active existing elementary school and is surrounded by urban developed uses. Vegetation at the campus consists of ornamental trees and plants, and a grass field on the existing playground There is no native habitat and no suitable habitat for threatened, endangered, or rare species on or near the site. The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the campus is very low. Therefore, no impact would occur on special-status species. This issue will not be addressed in the EIR.

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

No Impact. The campus is fully developed, consisting of an active existing elementary school. The U.S. Fish and Wildlife Service (USFWS) manages the National Wetlands Inventory (NWI), a digital Wetlands Mapper with vetted data to represent current information on wetlands, riparian, and deep-water habitats (USFWS 2022). There are no riparian habitats that exist on or adjacent to the campus (USFWS 2022). Thus, the Proposed Project would not affect any riparian habitats or other sensitive natural communities. Therefore, no impact would occur. This issue will not be addressed in the EIR.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to the USFWS's NWI, there are no wetlands near or within the McKinley ES campus (USFWS 2022). The campus is entirely developed and does not contain any waterways or undeveloped land

capable of supporting federally protected wetlands. Therefore, no wetlands would be impacted by the development activities that would occur on-site as a part of the Proposed Project. No impact would occur. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. Wildlife corridors refer to established migration routes commonly used by resident and migratory species for passage from one geographic location to another. Movement corridors may provide favorable locations for wildlife to travel between different habitat areas, such as foraging sites, breeding sites, cover areas, and preferred summer and winter range locations. They may also function as dispersal corridors allowing animals to move between various locations within their range.

The Proposed Project would require ground disturbances across the entire campus; however the campus is fully developed with an existing elementary school and is not suitable to function as a corridor for migratory wildlife.

Landscaped trees, shrubs, and structures present within the campus may provide nesting habitat for native bird and raptor species protected under the federal Migratory Bird Treaty Act (MBTA) and Fish and Game Code sections 3503 et seq. The Proposed Project would require the removal of some trees and shrubs within the Project Site. Construction activities would comply with the MBTA and Fish and Game Code sections 3503 et seq. To minimize direct impacts on nesting birds and raptors, nesting bird surveys would be conducted prior to the start of construction activities that may occur during the nesting season (February 1 through August 31). A qualified biologist would conduct a nest survey within one week prior to the commencement of construction to ensure that no active nests would be lost. If an active nest is located, then the nest would be flagged and construction within 300 feet (500 feet for raptors) of the nest would be postponed until the biologist has confirmed that the nest is no longer active.

Preconstruction nest surveys and compliance with the MBTA would ensure a less than significant impact to migratory wildlife species. This issue will not be further analyzed in the EIR.

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

No Impact. The Proposed Project would comply with the City of Santa Monica tree protection ordinance SMMC Chapter 7.40, Tree Code section 7.40.160 Protection of Trees; which requires that during the erection, repair, alteration or removal of any building, house, or structure in the City, any person in charge of such work shall protect any tree, shrub or plant in any street, sidewalk, parkway, alley or other public property within the City in the vicinity of such building or structure with sufficient guards or protectors as to prevent injury to said tree, shrub or plant arising out of or by reason of said erection, repair, alteration or removal. Although existing trees would be removed from the McKinley ES campus, it is not considered to be public property as described in the SMMC, which focuses on City of Santa Monica Property. No trees in public property, including adjacent sidewalks, would be removed or damaged as a result of implementation of the Proposed Project. Because the

trees that may be potentially removed within the school campus are not protected by a preservation policy or an ordinance the impacts of tree removal and/or relocation would be less than significant. The Proposed Project would not conflict with local polices or ordinances protecting biological resources. This issue will not be further analyzed in the EIR.

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

No Impact. The campus is within an urban and developed area. The campus is not within the area of an adopted Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state Habitat Conservation Plan. Therefore, the Proposed Project would not conflict with a Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state Habitat Conservation Plan and no impact would occur. This issue will not be further analyzed in the EIR.

5.5 CULTURAL RESOURCES

Would the project:

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

Potentially Significant Impact. According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." As discussed above in Section 3, *Project Description*, based on visual observation of the campus, research of primary and secondary sources, and an analysis of the eligibility criteria for listing at the federal, state, and local levels, the HRI identified a potential historic district at McKinley ES that is eligible for listing in the California Register of Historical Resources and for designation as a City of Santa Monica historic district under Chapter 9.56.100 (Landmarks and Historic Districts Ordinance) of the SMMC (HRG 2022). The following are considered to be contributing elements of the historic district: Buildings B and C, two site features (Santa Monica Boulevard Quad and Main Courtyard), and two additional features ("Storybook Land" Sculpture and WPA Bronze Plaque) with a period of significance from 1923 to 1937. The Proposed Project would result in building demolition and construction of new buildings that are part of a historic district. A historical resources assessment will be prepared to assess potential impacts to historical resources, in conformance with BP and AD 7113 as they relate to McKinley ES. Therefore, impacts to historical resources are potentially significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project would require ground disturbing activities within the McKinley ES campus during construction, which may result in the disturbance of archaeological resources. Excavation to depths greater than current foundations has the potential to encounter unknown archaeological

resources. An archaeological resources assessment will be prepared to assess potential impacts to archaeological resources. Therefore, impacts to archaeological resources are potentially significant and will be further analyzed in the EIR.

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

Less Than Significant Impact. There are no cemeteries or known human burials at the campus, which has been previously disturbed during construction of the existing school; however, ground disturbance (i.e., grading and excavation) would have the potential to result in discovery of human remains (although the potential is considered very low). In this unlikely event, the District would be responsible for compliance with Health and Safety Code section 7050.5 and CEQA Guidelines section 15064.5. Health and Safety Code section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin. Further, pursuant to Public Resources Code section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Los Angeles County coroner determines the remains to be Native American, the Native American Heritage Commission (NAHC) shall be contacted within 24 hours. Subsequently, the NAHC shall identify the most likely descendant. The most likely descendant shall then make recommendations and engage in consultations concerning the treatment of the remains, as provided in Public Resources Code section 5097.98. Adherence to existing legal requirements associated with human remains would reduce impacts associated with the disturbance of human remains. Therefore, impacts would be less than significant, and this impact will not be further analyzed in the EIR.

5.6 ENERGY

Would the project:

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

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

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

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

The Proposed Project would redevelop the existing school; therefore, increased electrical, gas, and transportation energy demands could result from Project implementation. Therefore, impacts related to energy use during operation would be potentially significant. The EIR will provide anticipated increase in demands and analyze potential impacts to existing energy services.

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

Potentially Significant Impact. The Proposed Project would redevelop and modernize the existing campus through renovation of structures to remain, construction of two new buildings, new and reconfigured playfields and playgrounds, and two new and reconfigured parking lots. The Proposed Project could conflict with a state or local plan for renewable energy or energy efficiency. Therefore, this impact would be potentially significant. Consistency with the energy-related goals and actions of the Districtwide Plan for Sustainability will be further analyzed in the EIR.

5.7 GEOLOGY AND SOILS

The following evaluation of geology and soils is based, in part, on the Geotechnical Exploration Report prepared for the campus in November 2021 by Leighton Consulting, Inc. The Geotechnical Exploration Report evaluates geologic, soil, and groundwater conditions at and in the immediate vicinity of the campus, as well as providing site-specific recommendations for geotechnical seismic design and on-site soil.

Would the project:

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

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

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. The campus is not located within an Alquist-Priolo Earthquake Fault Zone (Leighton Consulting 2021). No active faults are known across the campus (Leighton Consulting 2021). The campus is located within a City

of Santa Monica Fault Hazard Management Zone. The City Fault Hazard Management Zone is defined roughly as the area located between the active Northern strand and inactive Southern strand of the Santa Monica Fault Zone. The campus is located approximately 1,300 feet northwest of the mapped Southern strand, characterized as a structurally inverted Miocene normal fault that was active as a reverse fault during Miocene and latest Pliocene time (circa 1.5 to 5 mya); Quaternary strata are not deformed by this strand (Leighton Consulting 2021). The campus is located approximately 3,300 feet southeast of the mapped Northern strand, which is considered active. Based on subsurface exploration and geologic literature review, the potential for surface fault rupture within the campus is considered low (Leighton Consulting 2021). The nearest active fault is the Santa Monica Fault approximately 0.15 mile north of the campus (Leighton Consulting 2021). Therefore, there would be no impact associated with rupture of a known earthquake fault. This issue will not be analyzed further in the EIR.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The campus is situated in a seismically active region. As is the case for most areas of Southern California, ground-shaking resulting from earthquakes associated with nearby and more distant faults may occur at the campus. The closest major active faults are the Santa Monica Fault, Malibu Coast Fault, Newport-Inglewood Fault, Hollywood Fault, and the Palos Verdes Fault, approximately 800 feet, 2.8 miles, 4.5 miles, 5.4 miles, and 6 miles away respectively. These faults could have the potential to generate strong seismic ground shaking at the campus during an earthquake event. During the operation of the proposed development, seismic activity associated with active faults can be expected to generate moderate to strong ground shaking at the campus. Review of recent seismological and geophysical publications indicates that the seismic hazard for the campus is high (Leighton Consulting 2021).

All proposed structures would be designed and built in accordance with applicable current building codes and standards. The most recent building standard adopted by the legislature and used throughout the state is the 2022 version of the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]). These codes provide minimum standards to protect property and the public welfare and safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. Construction of the Proposed Project would adhere to the most recent version of the CBC. The Proposed Project design would be approved by the Department of the State Architect (DSA) and construction would be monitored by a DSA approved inspector. The Proposed Project would comply with the legal requirements school construction implemented to reduce impacts associated with strong seismic ground shaking. Impacts associated with strong seismic ground shaking would be less than significant, and this impact will not be further analyzed in the EIR.

5. Environmental Analysis

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the sudden decrease in the strength and stiffness of unconsolidated, saturated cohesionless soils typically resulting from seismic ground shaking. For soils to liquefy, the intensity and duration of the seismically induced cyclic loading must be sufficient to increase the excess pore water pressures to such an extent that the effective stresses on the soil particles reduces to zero. If liquefaction is initiated, the saturated soils behave temporarily as a viscous fluid and, consequently, lose their capacity to support the structures founded on them.

Review of both the Beverly Hills Quadrangle Seismic Hazard Zone and the City of Santa Monica Geologic Hazards map indicates that the campus is not within an area potentially susceptible to liquefaction (Leighton Consulting 2021). The campus is mapped within an area identified on the City of Santa Monica Geologic Hazards as a low to medium Liquefaction Risk. The site is underlain by stiff to hard clays interbedded with medium dense to dense sand and silty sand and groundwater is approximately 50 feet below ground surface (bgs). The potential for liquefaction and lateral spreading to affect the site is considered low (Leighton Consulting 2021). Therefore, impacts would be less than significant, and this impact will not be further analyzed in the EIR.

iv) Landslides?

Less Than Significant Impact. Significant landslides and erosion typically occur on steep slopes where stormwater and high winds can carry topsoil down hillsides. The McKinley ES campus is not located in an area mapped as potentially susceptible to seismically-induced landslides. No landslides are mapped or known to exist at the campus or vicinity. The campus is relatively flat and is not located adjacent to a significant slope. The potential for seismically induced landslides to affect the site is low (Leighton Consulting 2021). Implementation of the Proposed Project would not expose people or structures to substantial adverse hazards due to landslides, and impacts would be less than significant. This impact will not be further analyzed in the EIR.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place. Erosion occurs naturally by agents such as wind and flowing water; however, grading and construction activities can greatly increase erosion if effective erosion control measures are not used. Common means of soil erosion from construction sites include water, wind, and being tracked off-site by vehicles. The construction contractor would be required to take all measures deemed necessary during grading to provide erosion control devices in order to protect exposed soil and adjacent properties from storm damage and flood hazard originating on the Proposed Project. The Proposed Project would be required to comply with National Pollutant Discharge Elimination System (NPDES) permit requirements to control pollutants from being discharged into the water. Under the NPDES permit, which applies to grading activities of more than one acre and is administered under the Regional Water Quality Control Board (RWQCB), the SMMUSD would be required to prepare and implement a Storm Water Pollution Prevention Program (SWPPP), including a best management practices (BMP) program to address construction-related discharges. BMPs include, but are not limited to, the implementation of erosion and sediment controls. Because construction would occur throughout the year,

erosion-control BMPs must be implemented to ensure that sediment is confined to the construction area and not transported off-site. During construction, all stormwater runoff would be diverted to the appropriate catch basins and drainage channels subject to all applicable regulatory statutes and permits.

Soil erosion during the operation of the Proposed Project would be controlled by implementation of an approved landscape and irrigation plan, installation, and maintenance of post-construction BMPs, and paving of surface parking areas.

Adherence to the NPDES permit requirements and preparation of the SWPPP, and adherence to the erosion-control standards of the most current CBC would minimize the potential for erosion. The Proposed Project would have a less-than-significant impact associated with soil erosion or loss of topsoil. This impact will not be further analyzed in the EIR.

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

Less Than Significant Impact. As discussed above, the campus is not located within a liquefaction or landslide zones.

Lateral Spreading: Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. It differs from the slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass involved. The campus is underlain by stiff to hard clays interbedded with medium dense to dense sand and silty sand and groundwater is approximately 50 feet bgs. Thus, the potential for liquefaction and lateral spreading to affect the campus is considered low (Leighton Consulting 2021). Therefore, this impact would be less than significant and will not be further analyzed in the EIR.

Subsidence: The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. The Proposed Project would not result in excessive withdrawal of groundwater during construction and operation. Therefore, impacts associated with subsidence would be less than significant and will not be further analyzed in the EIR.

Collapsible Soils: Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. The collapse potential of the soils underlying campus is considered low. Considering the depth of groundwater, the risk of soil expansion and collapse are considered low if foundations are embedded a minimum of two feet below the lowest adjacent grade. The Proposed Project would adhere to the design recommendations provided in the Geotechnical Report that would reduce impacts associated with collapsible soils. Therefore, impacts associated with collapsible soils would be less than significant and will not be further discussed in the EIR.

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

Less Than Significant Impact. Expansive or shrink-swell soils are soils that swell when subjected to moisture and shrink when dry. Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. According to the Geotechnical Investigation Report, one expansion index test was performed from one representative bulk sample collected within the upper five feet which indicated an expansion index of 42, corresponding to a low potential for expansion. Due to the clayey nature of the near surface soils expansion potential is anticipated to vary, the expansion properties of the soil below the proposed new classroom building should be considered as medium (EI=51 to 90). Additional testing of soils upon completion of grading would be performed to confirm the results of the initial testing (Leighton Consulting 2021). The Proposed Project would follow design recommendations listed in the geotechnical report prepared for the Proposed Project. These include, but are not limited to, seismic design parameters, foundation design, grading, use of nonexpansive soils, etc. Additionally, implementation of standard engineering and earthwork construction practices, such as proper foundation design and proper moisture conditioning of earthen fills, would reduce the effects associated with expansive soils. Impacts resulting from expansive soils would be less than significant, and this impact will be further analyzed in the EIR.

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

No Impact. The Proposed Project would not include the installation or use of septic tanks or alternative wastewater disposal systems. The Proposed Project would connect to the existing sanitary sewer system for wastewater disposal. Thus, no impact related to alternative wastewater disposal systems would occur. This impact will not be further analyzed in the EIR.

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

Potentially Significant Impact. According to the Archaeological and Paleontological Resources Assessment, no fossil localities are located within the McKinley ES campus (Cogstone 2022). However, based upon fossils found in similar sediments, the campus has a higher sensitivity for paleontological resources, and impacts to unique paleontological resources could be potentially significant. This impact will be further analyzed in the EIR.

5.8 GREENHOUSE GAS EMISSIONS

Would the project:

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

Potentially Significant Impact. Global climate change is not confined to a particular project site and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even

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

While the Proposed Project is not anticipated to result in an increase in student capacity, it could potentially generate GHG emissions that could significantly impact the environment. The EIR will evaluate the potential for the Proposed Project to generate a substantial increase in GHG emissions, and mitigation measures will be incorporated as necessary.

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

Potentially Significant Impact. The California Air Resources Board's (CARB) Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target, established by AB 32 and SB 32, of 40 percent decrease in 1990 emission levels by 2030. In addition, SB 375, the Sustainable Communities and Climate Protection Act of 2008, was adopted by the legislature to reduce per capita vehicle miles traveled and associated GHG emissions from passenger vehicles. The Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal; SCAG 2020) identifies the per capita GHG reduction goals for the SCAG region. Development of the campus under the Proposed Project would generate a net increase of GHG emissions within the region. As a result, the Proposed Project has the potential to conflict with GHG reduction targets of CARB's Scoping Plan, and impacts are potentially significant. The EIR will evaluate consistency with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Mitigation measures will be identified as necessary.

5.9 HAZARDS AND HAZARDOUS MATERIALS

The following evaluation of hazards and hazardous materials is based, in part, on the Phase I Environmental Site Assessment prepared for the McKinley ES campus in April 2022 by Alta Environmental DBA NV5.

Would the project:

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

Potentially Significant Impact. Hazardous materials associated with the Proposed Project would consist mostly of construction related equipment and materials. Use and/or storage of hazardous materials at the campus are expected to be minimal and would not constitute a level that would be subject to regulation.

5. Environmental Analysis

Construction

During the construction phase, hazardous materials in the form of solvents, glues, and other common construction materials containing toxic substances may be transported to the site, and construction waste that possibly contains hazardous materials could be transported off-site for disposal. Federal, state, and local regulations govern the disposal of wastes identified as hazardous that could be produced during removal of existing asphalt and storage buildings, as well as during construction activities. The use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the City of Santa Monica and Los Angeles County Fire Department (LACoFD) would be required through the duration of the Proposed Project's construction. However, modernization of buildings could result in exposure to hazardous building materials containing polychlorinated biphenyls (PCBs), asbestos-containing building materials, lead-based paint, pesticides, and other hazardous building materials due to the age of the buildings and structures. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during the Proposed Project's construction would be potentially significant. This issue will be further analyzed in the EIR.

Operation

Operation of the Proposed Project would involve the limited use of hazardous materials for air conditioning, janitorial, maintenance, and repair activities. These materials would include commercial cleansers, lubricants, and paints. However, these types of materials are not considered acutely hazardous and would be used in limited quantities. The SMMUSD School Safety Plan outlines procedures to protect students and staff from exposure to hazards and hazardous materials. The SMMUSD School Safety Plan contains procedures to address evacuation, clean up, and communication to protect students and staff in case of a hazardous material spill (SMMUSD 2018). No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur within the McKinley ES campus.

The use, storage, transport, and disposal of hazardous materials of the Proposed Project would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, County of Los Angeles Department of Environmental Health, and LACoFD. Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials

during the Proposed Project's operation would not occur. Impacts would be less than significant. This topic will not be further analyzed in the EIR.

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

Potentially Significant Impact. A Phase I ESA conducted for the Proposed Project concluded that there is no evidence of a vapor encroachment condition (VEC), recognized environmental condition (REC), controlled REC, or historic REC (HREC) in connection with the campus (Alta Environmental 2022). However, based on the age of the buildings on the Site, there is the possibility for lead-based paint (LBP) residues within the shallow soil. Based on the age of historical and current structures on the campus, arsenic, lead-based paint, asbestos, pesticides, and PCBs in caulking may have been historically used at the Site. As a result, there is a potential for these compounds to be present in the shallow soils onsite (Alta Environmental 2022). Based on the findings of this assessment, the Proposed Project could result in a risk of release of hazardous materials into the environment. Therefore, potentially significant impacts may occur. This topic will be further analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project encompasses 5.7 acres of the 6.48-acre McKinley ES campus. As discussed in Section 5.9(a), operation of the Proposed Project is not anticipated to involve the handling of hazardous materials other than commercial cleansers, lubricants, and paints in limited quantities. However, construction of the Proposed Project would include the use and transport of hazardous materials in the form of fuel, solvents, glues, and other common construction materials containing toxic substances and construction waste. Furthermore, as discussed in Section 5.9(b), based on the age of historical and current structures on the campus, the Proposed Project could involve a risk of release of hazardous materials into the environment. Therefore, implementation of the Proposed Project could result in hazardous emissions or handling of acutely hazardous materials, substances, or waste. Impacts would be potentially significant. This topic will be further discussed in the EIR.

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

Potentially Significant Impact. Government Code section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Resources Control Board (SWRCB) has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. The McKinley ES campus does not appear on any regulatory agency database such as GeoTracker and EnviroStor (Alta Environmental 2022). However, regulatory database records and historical records indicate that a drycleaner operated at an adjoining property northeast of the campus located at 2441 Santa Monica Boulevard. Records indicate that perchloroethylene (a chlorinated solvent) was used at this facility. No violations, leaks, spills, or releases are

recorded for the drycleaning facility. However, based on the proximity of this facility to the campus and inherent environmental risk associated with dry-cleaning facilities this facility is considered to represent a possible REC. Therefore, impacts are potentially significant and this issue will be further analyzed in the EIR.

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

Less Than Significant Impact. The nearest public-use airport to the campus is Santa Monica Airport, approximately 1.75 miles southeast of the campus. The airport is governed by the Santa Monica Airport Code and the Los Angeles Regional Planning Commission /Airport Land Use Commission's Airport Land Use Compatibility (ALUC) guidelines (Los Angeles County ALUC 2004). The campus is not located within the airport's Planning Boundary/Airport Influence Area (Los Angeles County ALUC 2003), and therefore, the Proposed Project is not subject to the airport's land use restrictions. Federal Aviation Regulations Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Federal Aviation Regulations Part 77 requires that any applicant who intends to perform any construction or alterations to structures that exceed 200 feet in height above ground level must notify the Federal Aviation Administration for the Proposed Project's approval. The Proposed Project does not include structures 200 feet or greater in height that would conflict with FAR Part 77 regulations. The tallest building would be less than 55 feet. As a result, the Proposed Project would not result in safety hazards for people residing or working in the area.

Occupants of the campus would not be exposed to excessive noise from airport operations. As shown in the noise contour figure, the campus is not located within any noise contours for the airport (City of Santa Monica 2022). The Proposed Project would result in improvements to the existing campus facilities. No new land use is proposed. Therefore, implementation of the Proposed Project would not result in the exposure of occupants of the campus to increased safety hazards or noise related to airport operations. Impacts would be less than significant. This topic will not be further analyzed in the EIR.

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

Potentially Significant Impact. The Standardized Emergency Management System (SEMS), California Code of Regulations, Title 19, Division 2, section 2443, requires compliance with the SEMS to "be documented in the areas of planning, training, exercise, and performance." Emergency preparedness in the City of Santa Monica is overseen by the Office Emergency Management (OEM), and includes the Community Emergency Response Team (CERT) and a business continuity plan**.** The OEM addresses the planned response by the City of Santa Monica to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The purpose of EOM is to protect the community of Santa Monica from the loss of life and property in the event of a natural or man-made disaster (City of Santa Monica 2022c). Additionally, the City of Santa Monica Office of Emergency Management has adopted a Multi-Hazard Functional Emergency Plan, which is intended to address a wide range of natural and manmade emergencies and disasters (City of Santa Monica 2013). The District and Santa Monica College adopted an All-Hazard Mitigation Plan, which includes strategies and recommendations to reduce risks associated with the identified

hazards (SMMUSD 2017). In addition, the District adopted a Comprehensive School Safety Plan for all campuses, including the McKinley ES campus, that addresses specific procedures to follow in the event of various types of emergencies (SMMUSD 2018).

The Proposed Project would not interfere with the implementation of the OEM and any of the daily operations of the City's Emergency Operation Center (EOC), or the City's Fire and Police Departments. All construction activities would be required to be performed per the City's and the Fire Department's standards and regulations. Project plans would also be required to comply with all design standards established by DSA including Policy 07-03, "Fire Department and Emergency Access Roadways and School Drop-Off Areas." The purpose of this policy is to establish requirements based on State Fire Marshal Regulations contained in Titles 19 and 24 of the California Code of Regulations, and the California Vehicle Code for fire and emergency access roadways on public school or community college campuses, including fire and emergency access roadways combined with student drop-off and pick-up areas. DSA would review project plans to ensure that plans, specifications, and construction comply with California's building codes (Title 24 of the California Code of Regulations). As such, the Proposed Project would be subject to DSA plan review thereby ensuring the proposed design and internal circulation would meet all applicable regulations.

On-site vehicle and pedestrian circulation would be modified as part of the Proposed Project and could physically interfere with emergency responders. Impacts on emergency response or evacuation plans would be considered potentially significant and will be further analyzed in the EIR.

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

Less Than Significant Impact. According to the California Department of Forestry and Fire Protection (CAL FIRE), the City of Santa Monica, including the campus, is within a local responsibility area designated as a non-very high fire hazard severity zone (non-VHFHSZ)(CAL FIRE 2011). The campus is in an urban area, and there are no wildlands susceptible to wildfire on or near the campus. The nearest Fire Hazard Severity Zone to the campus is approximately 1.5 miles north. Therefore, the Proposed Project would not directly or indirectly expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, impacts would be less than significant, and this impact will not be further analyzed in the EIR.

5.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Potentially Significant Impact. Urban runoff from storms or nuisance flows (runoff during dry periods) from development projects can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, fertilizers, pesticides, trash, and sediment. This runoff can flow directly into local streams or into storm drains and continue through pipes until it is released untreated into a local waterway and eventually the ocean.

5. Environmental Analysis

Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats.

The construction and operational phases of the Proposed Project could have the potential to impact water quality. Construction activities may impact water quality due to the erosion of exposed soils. Therefore, impacts are considered potentially significant. This issue would be further analyzed in the EIR.

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

Potentially Significant Impact. The City of Santa Monica supplies potable water through a combination of local groundwater (approximately 60-70 percent of the total water supply) and imported water from the Metropolitan Water District (MWD), which accounts for approximately 30-40 percent of total water supply (Santa Monica 2021). As described in Section 3, *Project Description*, the Proposed Project would not change current enrollment or staffing therefore overall water demand is not expected to increase (and could in fact decrease with new fixtures and irrigation). Therefore, there would be no significant change in water use and no impact on groundwater supplies.

Additionally, it is unlikely that groundwater would be encountered during construction that would require dewatering, since groundwater was not encountered in our borings or cone penetrometer tests (CPTs) to the maximum depth explored of 51.5 feet bgs. Historic groundwater levels, as interpreted from the Beverly Hills 7.5 Minute Quadrangle, Los Angeles County, indicate historic high groundwater was at a level of approximately 40 feet bgs (Leighton Consulting 2021). Therefore, construction dewatering would not be necessary and would not impact groundwater recharge.

The campus is already built out with hardscape and impervious surfaces; however, the Proposed Project would increase the amount of impervious surfaces on the Project Site. Therefore, the Proposed Project could potentially result in a significant impact related to groundwater recharge. This topic will be further analyzed in the EIR.

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

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

Less than Significant Impact. Erosion and siltation impacts that could result from alteration of drainage patterns would, for the most part, occur during the Proposed Project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways.

The Proposed Project would not involve the alteration of any natural drainage channels or any watercourse. Most of the potential erosion and siltation impacts would occur during the construction phase (e.g., grading, clearing, excavating, and cut-and-fill activities) of the Proposed Project. The Proposed Project's

construction includes the removal of existing buildings and hardscape, which would expose loose soil to potential wind and water erosion. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. The SWRCB mandates that projects that disturb one or more acres of land must obtain coverage under the Statewide Construction General Permit (CGP). The CGP requires that prior to the start of construction activities, the project applicant must file Permit Registration Documents (PRD) with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. the Proposed Project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would describe the BMPs to be implemented during the Proposed Project's construction activities, including:

- Minimize disturbed areas of the site.
- Preserve existing vegetation to the maximum extent practicable.
- Revegetate exposed areas as quickly as possible.
- Install on-site sediment basins to prevent off-site migration of erodible materials, as needed.
- Install velocity dissipation devices at outlets of sediment basins.
- Implement dust control measures, such as silt fences and regular watering of areas.
- Stabilize construction entrances/exits.
- Install storm drain inlet protection measures.
- Install sediment control measures along the site, such as silt fences or gravel bag barriers.

The incorporation of these SWPPP measures during the construction phase would minimize the potential for erosion and siltation impacts.

The operational phase of the Proposed Project would contain a number of LID features to reduce the impact of erosion and siltation. The site design, source control, and treatment control BMPs for the operational phase would include the following:

- Control peak runoff through the installation of vegetated swales, pervious pavement and flow-through planters that connect to existing stormwater infrastructure.
- Use native or drought-tolerant vegetation and shrubs in landscaped areas to minimize water usage and reduce stormwater flows.

Implementation of the Proposed Project's construction phase and operational phase BMPs would ensure that erosion and siltation impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The campus is already built out with hardscape and impervious surfaces, and implementation of the Proposed Project would not substantially increase the amount of impervious surfaces on the Project Site. Runoff at the existing school is currently collected via ditches and storm drain inlets and conveyed to underground piping that connects to existing storm drains beneath Chelsea Avenue and Santa Monica Boulevard. With the implementation of the Proposed Project LID features, including vegetated swales, flow-through planters and pervious pavement, the amount of stormwater runoff reaching the City's storm drain system should be less than under existing conditions.

With the implementation of site BMPs designed to collect and detain peak runoff flows, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding. Therefore, impacts related to stormwater drainage and flooding are less than significant. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. As stated in the previous impact discussion, campus is already built out with hardscape and impervious surfaces, and implementation of the Proposed Project would not substantially increase the amount of impervious surfaces on the campus. The current plan is to detain and treat runoff with vegetated swales and flow-through planters and decrease the amount of runoff with the use of permeable pavement. Therefore, the amount of stormwater runoff diverted to the City's storm drain system would be less than the discharge rates under existing conditions and the capacity of the storm drain system would not be exceeded.

The Proposed Project would not create substantial additional sources of polluted runoff. During the construction phase, the Proposed Project would be required to prepare a SWPPP that includes erosion controls, thus limiting the discharge of pollutants from the site. During operation, the Proposed Project would implement LID features and BMP measures that minimize the amount of stormwater runoff and associated pollutants.

With implementation of these measures, the Proposed Project would not substantially increase the rate or amount of stormwater runoff in a manner that would cause flooding. Therefore, stormwater runoff would not exceed the capacity of existing or planning storm drain facilities and impacts would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The campus is within Federal Emergency Management Act (FEMA) Flood Zone Designation X (Zone X) (FEMA 2021). Zone X is an area of minimal flood hazard, usually depicted on Flood Insurance Rate Maps (FIRMs) as above the 500-year flood level Additionally, the McKinley ES campus is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding

in the unlikely event of a tank failure (DSOD 2022). The campus is not within a flood hazard area and implementation of the Proposed Project would not place new structures within a flood hazard area or redirect flood flows; therefore, no impact would occur. This issue will not be further analyzed in the EIR.

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

No Impact. As noted in Section 3.10(c)(iv), above, the campus is not in a flood hazard area. The campus is also not within an area subject to tsunami nor seiches (Leighton 2021; DSOD 2022). All chemicals and potentially hazardous materials on-site would be stored, used, and transported in compliance with local, state, and federal regulations. Therefore, the Proposed Project would result in no impact related to the release of pollutants due to Project inundation from flooding, tsunami, and seiche. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The Los Angeles RWQCB monitors surface water quality through implementation of the Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, also referred to as the "Basin Plan," and designates beneficial uses for surface water bodies and groundwater within the area. The Basin Plan also contains water quality criteria for groundwater.

The Proposed Project would be subject to the Statewide CGP and implementation of BMPs specified in the SWPPP during construction. This would minimize the potential for erosion or siltation impacts to occur that could impact receiving waters. Also, the installation of LID features such as vegetated swales, flow-through planters, and pervious pavement, as well as the capture and reuse irrigation system would treat and control runoff before it enters the City's storm drain system and thus improve the water quality of the stormwater. Therefore, the Proposed Project would not conflict with or obstruct the implementation of the Basin Plan.

The campus is located within the Santa Monica Groundwater Basin (City of Santa Monica 2021), which is covered under the 2022 Groundwater Sustainability Plan (GSP). This basin has been characterized by the Department of Water Resources as a medium priority subbasin. The groundwater basin is not adjudicated, and the City of Santa Monica is the only municipality that pumps groundwater from this basin. The GSP provides management criteria to ensure that the sustainable yield of the groundwater basin is not exceeded. Since the Proposed Project would not increase enrollment over existing conditions, no additional groundwater will be necessary for this Proposed Project, and the Proposed Project would not interfere with the implementation of the GSP.

As discussed in the Sections 3.10(a) and (b), above, compliance with existing laws and regulations would ensure that the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and would result in a less than significant impact. This issue will not be further analyzed in the EIR.

5.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The campus is located within an established and currently operating elementary school campus. The surrounding area is fully developed with urban land uses, including residential land uses. The Proposed Project construction and operational activities would occur within the existing campus and would not divide an established community. Therefore, no impacts related to the physical division of an established community would result from the Proposed Project. This issue will not be further analyzed in the EIR.

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

No Impact. The zoning and General Plan Land Use designation for the school property is Institutional/Public Lands, which is the designation for the use and development of public or semi-public facilities, including municipal offices, schools, libraries, museums, or performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This District is consistent with the Institutional/Public Lands land use designation. The Proposed Project would be developed within the boundaries of the McKinley ES campus. The Proposed Project's development would not require modification to the site's General Plan land use and zoning designations. Development of the Proposed Project would not conflict with any applicable land use plans, policies or regulations. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

5.12 MINERAL RESOURCES

Would the project:

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

No Impact. The campus is mapped Mineral Resource Zone 1 (MRZ-1) by the California Geological Survey, indicating that it is located in an area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. According to the DOC California Geologic Emergency Management Division (CalGEM), no mineral resource recovery sites are located on or in the immediate vicinity of the campus (DOC 2022c). The two nearest oil and gas wells to the campus are idle dry wells and are located approximately 1.6 miles to the north. The nearest active well is approximately three miles to the south (DOC 2022c). Additionally, the nearest mine is approximately 15 miles northeast of the campus (DOC 2016). No mineral resources are identified on or near the campus in the City's General Plan. As a result, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and no impacts would occur. This issue will not be addressed in the EIR.

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

No Impact. As discussed in 5.12(a), the campus is not mapped in a mineral resource area, a surface mining district, an oil drilling district, or in a State-designated oil field. The campus has a land use designation of Institutional/Public Lands and is developed with an operating elementary school campus. As such, it is not currently used for mineral resource extraction, and there are no plans to use the site for mineral resource extraction in the future due to the lack of presence of mineral resources. Therefore, development of the Proposed Project would not cause a loss of availability of a mining site, and no impact would occur. No further analysis is required.

5.13 NOISE

Would the project result in:

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

Potentially Significant Impact. Implementation of the Proposed Project would involve construction, including removal of some existing buildings/facilities, and operational activities that would generate noise levels that may expose sensitive land uses to noise levels in excess of the noise standards. Short-term construction activities could elevate ambient noise levels at nearby noise-sensitive receptors. Santa Monica Municipal Code section 4.12.110(a) limits construction to the hours of 8:00 a.m. to 6 p.m., Monday through Friday; 9:00 a.m. to 5:00 pm on Saturday. Construction is not allowed on Sundays or on holidays. However, the District intends on obtaining the After-Hours Construction Permit, which would allow Proposed Project construction to begin at 7 a.m. to help improve pedestrian safety and reduce traffic congestion during construction activities. According to Section 4.12.110(b) noise created by construction activity shall not cause the equivalent noise level to exceed the noise standards specified in Table 11, *Noise Standards for Zone I* below, for the noise zone where the measurement is taken, plus 20 dBA. The Proposed Project's construction activities could result in a substantial temporary increase in ambient noise levels in the Proposed Project's vicinity. Impacts are potentially significant.

Table 11 Noise Standards for Noise Zone I[1]

Days	Time Interval	Allow Leq (Exterior Noise)	Allow Leq (Construction Noise)	Allow Leq (Exterior Noise)	Allow Leq (Construction Noise)
		15-minute continuous measurement period		5-minute continuous measurement period	
Monday- Friday	10 p.m. to 7 a.m.	50 dBA	70 dBA	55 dBA	75 dBA
	7 a.m. to 10 p.m.	60 dBA	80 dBA	65 dBA	85 dBA
Saturday and Sunday[2]	10 p.m. to 7 a.m.	50 dBA	70 dBA	55 dBA	75 dBA
	8 a.m. to 10 p.m.	60 dBA	80 dBA	65 dBA	85 dBA

Source: Santa Monica Municipal Code 2022, Chapter 4.20, Noise

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

2 No Construction will be allowed on Sunday or holidays

Long-term operation of new development under the Proposed Project could result in long-term noise impacts if Proposed Project-related noise sources substantially increase noise levels in the vicinity of the campus at levels that exceed thresholds identified by the SMMC at offsite sensitive receptors. Operational noise sources will likely include stationary sources such as heating, ventilation, and air conditioning units; activities associated with outdoor activities; and educational and recreational uses. Temporary and long-term noise as a result of the Proposed Project's implementation is potentially significant. Impacts associated with temporary construction-related noise levels and long-term operational noise levels will be further analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project's construction can generate varying degrees of groundborne vibration, depending on the specific activities and equipment (e.g., pile drivers, jackhammers, dozers, haul trucks) used. Construction equipment can generate vibrations that spread through the ground and diminish with distance from the vibration source. The effect on buildings and sensitive receptors in the vicinity of the construction site varies depends on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to architectural damage at the highest levels. There are nearby buildings/structures, including buildings identified as part of a historic district that might be uniquely susceptible to damage from vibration and sensitive receptors near the campus that could be affected by any construction-related groundborne vibration generated at the campus. This construction-related vibration impact is potentially significant and will be further analyzed in the EIR.

The Proposed Project involves the modernization of an existing school campus. This use would not create operational-related groundborne vibration or noise on the campus as there are no notable sources of vibrational energy associated with these uses. Therefore, no operational-related groundborne vibration or groundborne noise impact would result from the Proposed Project.

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

No Impact. The nearest public-use airport to the campus is Santa Monica Airport, approximately 0.5 miles southeast of the campus. The campus is not within any airport noise contours (Santa Monica 2022a). Therefore, no impact would occur, and this impact will not be addressed in the EIR.

5.14 POPULATION AND HOUSING

Would the project:

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

No Impact. The campus is located within a built-out, urbanized community, and no new roads or extensions of existing roads are proposed. The Proposed Project does not include the construction of any new homes or businesses or changes to the existing land uses onsite**.** As discussed in Section 3.0, *Project Description*, construction activities of the Proposed Project would demolish and remove 10 existing modular classrooms, a portion of one permanent building, playground restrooms, and shade structures; construct two new buildings, outdoor play areas, and two new and reconfigured parking lots; and renovate one existing building, the existing library, and the existing central garden. The Proposed Project includes improvements to the campus that would accommodate current and future planned student enrollment in accordance with the District's education specifications by providing adequately-sized learning environments. Similar to other construction projects in the region, the Proposed Project's construction workers are expected to be drawn from the large, available regional labor force, who would commute to the campus during the construction phases. As such, the Proposed Project would not induce construction employees to move to the Proposed Project's vicinity. Therefore, no direct or indirect increases in population growth would result with the Proposed Project's implementation, and no impact would occur. No further analysis in the EIR is required.

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

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

5.15 PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. Fire protection services are provided to the campus by the City of Santa Monica Fire Department (SMFD). The McKinley ES campus is served by Fire Station 3 located at 1302 19th Street, approximately 0.25 mile west of the campus. Fire Station 3 is both a traditional fire-fighting company, as well responding to aircraft- and hazardous materials-related emergencies. The station houses two paramedic-staffed fire engines, 3 and 4. Station 3 crews respond to all fire and life safety emergencies in their district, including medical emergencies. (SMFD 2022). The proposed campus modernization efforts would not result in an increase in student enrollment or faculty at the campus. As such, the Proposed Project would not increase demand for fire protection services beyond existing conditions. Furthermore, upgrades to existing buildings and construction of new buildings would be subject to current fire code and SMFD requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access. Compliance with fire code

standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would be subject to DSA review to ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by DSA and California's building codes (Title 24 of the California Code of Regulations). DSA would review fire department and emergency access roadways and school drop-off and pick-up areas to ensure adequate emergency access is maintained. Fire alarm systems, elevator systems, and building occupancy would also be reviewed for compliance with current safety standards and regulations. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives such that environmental impacts would result. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

b) Police protection?

Less Than Significant Impact. Police protection services are provided to the campus by the Santa Monica Police Department (SMPD). The SMPD operates from one station located at 333 Olympic Boulevard, approximately 1.2 miles west of the campus. According to the most recent SMPD Biennial Report for 2019 to 2020, the SMPD is comprised of 219 sworn officers and 205 civilian personnel. In 2020, the SMPD responded to 97,000 calls for service (SMPD 2021). The Proposed Project would not increase student enrollment or staff and would not induce population growth; therefore, the Proposed Project would not increase the need for additional police protection services. Active construction areas would be fenced and would remain secured outside of work hours. Any increase in police demands would be temporary and would not require construction of new or expanded police facilities. Since the project would not increase the student population or intensify use of the campus, project implementation would not increase the demand for police services or generate a need for additional law enforcement facilities. The Proposed Project would not increase student population or demand and would not result in new adverse impacts on existing police service such that environmental impacts would result. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

c) Schools?

No Impact. The Proposed Project involves the modernization of the existing McKinley ES campus. As of 2021, the District enrolled approximately 9,200 students in Transitional Kindergarten through 12th grade in nine elementary schools, three middle schools, two comprehensive high schools, a continuation high school, a K-8th grade alternative school and Project-Based Learning High School pathway. The Proposed Project is designed to update the campus facility to align with the Districtwide Educational Specifications (SMMUSD 2019). The Proposed Project would develop new and renovated facilities that would support a project-based learning approach at McKinley ES that would expand instructional strategies currently in place in the District and address future learning that is flexible, adaptable, and project-centered in its delivery. Typically, the demand for schools is created by new housing development or activities that generate additional population. The Proposed Project would not generate an increase in student enrollment. The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. Therefore, the Proposed Project would have no impact related to schools. This issue will not be further analyzed in the EIR.

d) Parks?

Less Than Significant Impact. Typically, the demand for parks is created by the development of new housing and/or actions that generate additional population. As described above, the Proposed Project would serve an existing student population and would not induce population growth, housing, or student enrollment in the area. The Proposed Project would not increase the use of existing parks or recreational facilities, or the need for new parks or recreational facilities in the City of Santa Monica. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

e) Other public facilities?

No Impact. The Proposed Project does not include development of residential or commercial uses and would not contribute to population growth in the City of Santa Monica. Therefore, the Proposed Project would not increase the demand for public facilities, such as library services or other administrative services in the City of Santa Monica. Therefore, the Proposed Project would have no impact related to other public facilities, and no mitigation is required. This impact will not be further analyzed in the EIR.

5.16 RECREATION

Would the project:

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

No Impact. Typically, the demand for parks is created by the development of new housing and/or actions that generate additional population. There are 60 parks located throughout the City. The closest park to the campus is Clover Park, located at 2600 Ocean Park Boulevard and approximately 0.20 miles southeast of the campus. There are also a number of recreational facilities located throughout the City that run various programs, including five community gardens, aquatics center, and gym. The Proposed Project would serve an existing student population and would not increase student enrollment. The Proposed Project would not result in an increase in students or staff at the school and would not increase population in the surrounding community and would not result in the need for construction of new recreational facilities. The Proposed Project is intended to modernize the McKinley ES campus with facilities that would accommodate current and planned future student enrollment in accordance with the District's educational specifications. As the proposed facilities and upgrades would be adequate to serve the existing and future student population, increased demand for off-site recreational resources, parks, or other facilities within the City is not anticipated as a result with the Proposed Project's implementation. As such, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that the substantial physical deterioration of recreational facilities would occur or be accelerated. There would be no impact, and this issue will not be further analyzed in the EIR.

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

No Impact. Refer to response 5.16 (a), above. The Proposed Project would not require the construction or expansion of additional recreational facilities that would have an adverse effect on the environment. Therefore, no impacts related to recreational facilities would occur and no further analysis is required in the EIR.

5.17 TRANSPORTATION

The following evaluation of transportation and pedestrian safety is based, in part, on the McKinley ES Access and Pedestrian Safety Analysis prepared for the McKinley ES campus in September 2022 by IBI Group.

Would the project:

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

Potentially Significant Impact. Implementation of the Proposed Project would potentially result in the modification of on-site pedestrian and vehicular circulation. An access and pedestrian safety analysis will be prepared to assess existing and proposed conditions for vehicular access (parking and pick-up/drop-off operations) and safety related to pedestrian circulation. The analysis will be prepared in accordance with relevant City of Santa Monica Development Standards and the Santa Monica Department of Transportation standards. This assessment will help form the basis for the impact analysis to be provided in the EIR. The EIR will address consistency with existing programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. This impact is potentially significant and will be further analyzed in the EIR.

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

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

Construction of the Proposed Project would require the mobilization of workers, vendors, equipment, and haul trucks to and from the campus, which would generate a temporary increase in traffic. The Proposed Project would modernize the McKinley ES campus and would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school. An access and pedestrian safety analysis will be prepared for the Proposed Project and will address the Proposed Project's trip generation and address consistency with CEQA Guidelines section 15064.3. This impact is potentially significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. Currently, site access is provided from Santa Monica Boulevard and along Chelsea Avenue. Building C faces Santa Monica Boulevard, and its architecture still signals that this is the front of school; however, because now most children arrive by automobile and are dropped off and picked up, and because of the busy arterial nature of Santa Monica Boulevard, the front of school has migrated to the Chelsea Avenue frontage.

Main site access would remain along Chelsea Avenue after implementation of the Project. The Proposed Project would include a new early education/visitor parking lot with 15 parking stalls on Chelsea Avenue that would include an off-street lane for drop-off/pick-up and an arrival court east of the existing Building C. The existing lot in the eastern portion of the campus would be removed. One new parking lot in the western part of the campus would be provided along 23rd Court. The parking lot would include approximately 78 parking stalls and would provide staff and after-hours/weekend community parking. It would also retain 7 existing stalls along 23rd Court. Therefore, the Proposed Project would increase parking on the existing campus from 90 to 100 parking spaces. Therefore, impacts are considered potentially significant in this regard. An access and pedestrian safety analysis will be prepared to assess existing and proposed conditions for vehicular access (parking and pick-up/drop-off operations) and safety related to pedestrian circulation. Impacts related to circulation/transportation design features are potentially significant and will be further analyzed in the EIR.

d) Result in inadequate emergency access?

Potentially Significant Impact. The Project proposes modifications to vehicular access and circulation on the campus. To address fire and emergency access needs, the Proposed Project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and Fire Department. The Proposed Project would also be subject to review by DSA who oversees design and construction for K–12 schools. The Proposed Project would also be required to comply with all design standards established by DSA including Policy 07-03, "Fire Department and Emergency Access Roadways and School Drop-Off Areas." The purpose of this policy is to establish requirements based on State Fire Marshal Regulations contained in Titles 19 and 24 of the California Code of Regulations, and the California Vehicle Code for fire and emergency access roadways on public school or community college campuses, including fire and emergency access roadways combined with student drop-off and pick-up areas. DSA would review project plans to ensure that plans, specifications, and construction comply with California's building codes (Title 24 of the California Code of Regulations). As such,

the Proposed Project would be subject to DSA plan review thereby ensuring the proposed design and internal circulation would meet all applicable regulations.

The City and Fire Department would be responsible for reviewing the Proposed Project's compliance with related codes and standards prior to issuance of building permits. Due to campus vehicular circulation modifications, impacts related to emergency access are potentially significant and will be further analyzed in the EIR.

5.18 TRIBAL CULTURAL RESOURCES

Would the project:

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

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

In accordance with Public Resources Code section 21080.3.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the Proposed Project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation for tribal cultural resources. The Gabrieleno Band of Mission Indians – Kizh Nation and Torres Martinez Desert Cahuilla Indians are on the SMMUSD's notification list pursuant to AB 52. The District provided notification letters to these tribes on January 12, 2023 and as of the time of publication of this Initial Study, no response has been received. Impacts to tribal cultural resources are considered significant.

In addition to notification of and potential consultation with Native American tribes that have requested to be notified of projects in the City, a Sacred Lands search request was sent to the Native American

Heritage Commission (NAHC). The NAHC indicated that that there are no sacred lands known within the McKinley ES campus and immediate area. Impacts to tribal cultural resources will be further analyzed in the EIR.

5.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less than Significant Impact. The Proposed Project would redevelop and modernize portions of the existing campus, which would require installation of the utility improvements to serve the new buildings and outdoor facilities. All utility infrastructure improvements (specifically water, sewer, electrical, natural gas, and telecommunications) would be developed within the campus during each phase of construction. Following full buildout of the Proposed Project, the school would operate under the same staffing and enrollment capacity as under current conditions. Off-site improvements to connecting utilities are not anticipated. Additionally, new construction would comply with the latest CALGreen Building Standards Code, which would result in reductions in water and wastewater generation and power and natural gas consumption.

Following is a discussion of the Proposed Project's potential impacts on water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities.

Water Supply Facilities

The City provides potable water to the campus, and its supplies are sourced from local groundwater from the Santa Monica Groundwater Basin and water purchased from the Metropolitan Water District of Southern California (MWD). The Proposed Project includes construction of new school buildings within the existing footprint of McKinley Elementary School, which would require the installation of utility improvements necessary to serve the new buildings and facilities. Water is currently provided to the campus by the City's existing water mains along Chelsea Avenue and 23rd Court. Potable water and fire water would be provided to the new buildings through connections to the existing water main along Chelsea Avenue.

The proposed water system improvements would be designed and constructed in accordance with City code requirements and would require City approval. In addition, the Proposed Project is required to implement section 7.16.020, Water Conservation Requirements, to reduce water consumption impacts. The Proposed Project would be designed to include green building practices/features pursuant to CALGreen that would help reduce water usage and demand, including drought-tolerant landscaping with automatic irrigation systems and high-efficiency plumbing fixtures. Specifically, project development would include mandatory standards from Division 5.3, Water Efficiency and Conservation, of CALGreen.

The Proposed Project would not increase the student or staff population; therefore, there would be no net increase in indoor water supply. In fact, the installation of low-flow plumbing fixtures would reduce the water

demand as compared to current conditions. Outdoor irrigation would be supplied with an on-site cistern that captures stormwater from the LID features and pumps it to the on-site irrigation system. Therefore, upon completion of the Proposed Project, the water demand should be less than current conditions.

The Proposed Project's development would not require the construction of new or expanded water facilities that could cause significant environmental effects. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

Wastewater Treatment Facilities

The City provides wastewater collection and conveyance service to the McKinley ES campus. Wastewater generated at the campus is conveyed to the City of Los Angeles' Hyperion Water Reclamation Plant (HWRT). According to the City of Los Angeles' Wastewater Facilities Plan, the HWRT is projected to treat average wastewater flows of 283 million gallons per day (mgd) in 2040 and has a flow capacity of 450 mpd (Los Angeles 2018). The proposed modernization of McKinley Elementary School is not expected to result in an increase in wastewater generation as staffing and enrollment would not increase. In fact, wastewater generation rates are projected to be less than current conditions with the installation of low-flow plumbing fixtures that are required by the CALGreen Building Standards Code, and would be consistent with the energy-related goals and actions of the Districtwide Plan for Sustainability (SMMUSD 2019). Wastewater generated at the new buildings will be conveyed to the existing City sanitary sewer main beneath Chelsea Avenue.

Therefore, the Proposed Project's development would not require the construction of new or expanded wastewater facilities that could cause significant environmental effects. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

Stormwater Drainage Facilities

Impacts related to storm drainage facilities are addressed in Section 4.10, *Hydrology and Water Quality*, Impact c.iii, above. As discussed in that Section, the McKinley ES campus is already built out with hardscape and impervious surfaces, and implementation of the Proposed Project would not substantially increase in the amount of impervious surfaces on the campus. The proposed plan is to detain peak runoff on-site, treat runoff with vegetative swales and flow-through planters, and reuse runoff for site irrigation with the construction of a capture and reuse system near the southeast corner of the school site. Excess water would be discharged to the existing City storm drains beneath Chelsea Avenue and Santa Monica Boulevard. With the implementation of these LID features, the amount of stormwater discharged to the City's storm drain system should be significantly less than the volume discharged under existing conditions.

Implementation of the LID features, as outlined in Section 4.10, would ensure that a new or expanded storm drain system would not be necessary and impacts would be less than significant. This issue will not be further analyzed in the EIR.

Electricity and Natural Gas Facilities

Electricity would be supplied by the Clean Power Alliance, distributed through the grid owned and operated by SCE, and natural gas would be supplied by SoCalGas. All new utility infrastructure will be installed underground.

Total mid-electricity consumption in SCE's service area is forecast to decrease by approximately 13,411 GWh between 2018 and 2030 (CEC 2020a). SCE forecasts that it will have sufficient electricity supplies to meet demands in its service area and the electricity demand due to the Proposed Project's development is within the forecast increase in SCE's electricity demands. Project development would not require SCE to obtain new or expanded electricity supplies.

Additionally, the total gas consumption in the SoCalGas service area was approximately 7,406 million therms in 2019, with slightly decreasing demand projected up to 2030 (CEC 2020b). The natural gas consumption rate for the Proposed Project is typical for projects of this size and is a modest increase in gas use in the context of SoCalGas' service territory.

Furthermore, the Proposed Project would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The Proposed Project would also comply with CALGreen requirements related to energy and water conservation. These measures will decrease electricity and gas consumption.

Therefore, the Proposed Project would not result in a substantial increase in natural gas and electrical service demands. SCE and SoCalGas would not need to expand their supply and transmission facilities to handle the demand generated by the Proposed Project. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

Telecommunication Facilities

Various private services, including AT&T and Time Warner Communications, provide telecommunication services to the City, including the McKinley ES campus. The Proposed Project would include onsite connections to offsite telecommunication services and facilities in the immediate area of the campus. The construction-related impacts associated with these improvements are analyzed throughout this Initial Study as part of the Proposed Project's development. Additionally, facilities and infrastructure for the various telecommunication providers are adequate to serve the needs of the Proposed Project. Therefore, the Proposed Project's development would not require the construction of new or expanded telecommunication facilities. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The 2020 Urban Water Management Plan (UWMP), adopted in June 2021, evaluated the reliability of water service to its customers under normal conditions, a single dry year, and a drought period lasting five consecutive years. The UWMP determined that even under a five-year drought, there would be adequate water supplies within the City's service area (City of Santa Monica 2021). The City estimates

that water demands in its service area for normal years would increase from approximately 10,514 acre-feet per year in 2020 to approximately 15,262 acre-feet per year in 2040, and it would have sufficient water supplies to meet proposed growth in its service area for normal, single-dry, and multiple-dry years (Santa Monica 2021).

The proposed modernization of McKinley Elementary School would not increase the student or staff population and therefore, there would be no increase in indoor water demand. In fact, compliance with the provisions of CALGreen Building Standards Code for new construction would require the installation of low-flow plumbing fixtures, which would reduce water consumption as compared to current conditions. And as part of the LID features of the Proposed Project, a capture and reuse system will be installed to supply water for outdoor irrigation. This would further reduce the water demand of the Proposed Project.

Therefore, there would be sufficient water available to serve the Proposed Project and reasonably foreseeable future development during normal, dry, and multiple-dry years and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. Sewer infrastructure servicing the City, including the McKinley ES campus, is maintained by the Santa Monica Water Resources Division. The City's sewer system consists of a combination of gravity sewers, force mains, monitoring stations and a lift station to help convey sewage to the City of Los Angeles' Hyperion Wastewater Treatment Plant (HTP). The City's sanitary sewer facilities include approximately 152 miles of pipelines, 2 two permanent flow monitoring and sampling stations and one, 26 mgd pumping station (Santa Monica 2017). On average, 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day. Because the amount of wastewater entering the plant can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd (Los Angeles 2022).

As noted in impact 5.19.a, the Proposed Project would not result in more waste water generation than existing conditions as the Proposed Project would not increase capacity. The Proposed Project would incorporate indoor water conservation measures that would reduce waste water generation rates. Therefore, impacts would be less than significant and will not be further analyzed in the EIR. This topic will not be further analyzed in the EIR.

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

Less Than Significant Impact. Solid waste would be generated during construction and operation of the Proposed Project. Solid waste from all District schools is collected by Waste Management and includes landfill trash, comingled recycling, and organic waste collection and disposal. There are separate color-coded dumpsters for each waste stream (black for trash, blue for recycling, and green for organic waste). Solid waste generated in the City of Santa Monica is disposed of at 14 landfills throughout southern California, including Chiquita

Canyon Sanitary Landfill, Sunshine Canyon City/County Landfill, Antelope Valley Public Landfill, and others (Santa Monica 2021). The combined remaining capacity of the landfills is 648.7 million tons.

Demolition of the existing buildings would generate demolition debris. Section 5.408, Construction Waste Reduction, Disposal, and Recycling, of the California Green Building Standards Code (CALGreen, §5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, demolition from the Proposed Project would not significantly impact landfill capacity. In accordance with section 8.108.130 of the Santa Monica Municipal Code, as well as the City's Department of Public Works, applicants for construction or demolition permits involving a regulated project shall complete and submit a waste management plan (WMP) (Santa Monica 2021).

The Proposed Project is not anticipated to increase student capacity and therefore, there would be no increase in the amount of solid waste generated by the McKinley ES campus. The Proposed Project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals and impacts would be less than significant. This topic will not be further analyzed in the EIR.

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

Less Than Significant Impact. The City of Santa Monica and the District comply with State requirements to reduce the volume of solid waste through recycling and organic waste diversion. The City's 2020 per capita disposal rates of 3.8 pounds per person per day (ppd) per residents and 4.0 ppd per employee are well below the CalRecycle targets of 10.9 ppd per resident and 13.5 ppd per employee (CalRecycle 2019). Also, the District has implemented a Sustainability Plan that describes the District's recycling, diversion and waste generation goals for 2020, 2025 and 2030 (Santa Monia-Malibu Unified School District 2019).

The District currently complies with federal, state, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act and local recycling and waste programs. The District and its construction contractor would comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. CALGreen section 5.408, Construction Waster Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The Proposed Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant. This topic will not be further analyzed in the EIR.

5.20 WILDFIRE

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

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

No Impact. The campus is located within a local responsibility area designated as a non-VHFHSZ (CAL FIRE 2011). The campus is not located in or near an SRA or lands classified as VHFHSZ. The nearest Fire Hazard Severity Zone to the campus is approximately 1.5 miles north. The Proposed Project would not impair an adopted emergency evacuation or response plan within such an area. No impact would occur and further analysis will not be required in the EIR.

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

No Impact. The McKinley ES campus is not located in or near an SRA or lands classified as VHFHSZ. The campus is generally flat without significant topography, and there are no steep slopes where high winds can exacerbate wildfire risks. The campus is developed within an urban and built area. No wildlands exist within the immediate vicinity of the campus. Therefore, the Proposed Project would not exacerbate wildfire risks or expose the Proposed Project's occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire within such an area. No impact would occur, and this topic will not be further analyzed in the EIR.

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

No Impact. The Proposed Project does not require the installation or maintenance of associated infrastructure. Therefore, the Proposed Project would not exacerbate fire risk or result in temporary or ongoing impacts to environment. No impacts would occur, and this topic will not be further addressed in the EIR.

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

Less than Significant Impact. Refer to Responses 3.7(a)(iii) and 3.10(c)(i) and (ii). The topography of the campus is relatively flat, and the soils on the McKinley ES campus are not susceptible to landslides. Additionally, implementation of the Proposed Project would not alter the existing drainage patterns or substantially increase the amount of runoff. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, and impacts would be less than significant, and this topic will not be further addressed in the EIR.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Impact. As stated in Section 5.4, *Biological Resources*, the McKinley ES campus is presently developed with an existing school, and ongoing operations greatly reduces the potential for sensitive habitat or species to be present on-site. The campus is in an urban and fully developed area and would not have an impact on the habitat or population level of fish or wildlife species; threaten a plant or animal community; or impact the range of a rare or endangered plant or animal. However, as stated in Section 5.5, *Cultural Resources*, the Proposed Project would require ground disturbing activities within the McKinley ES campus during construction of the Proposed Project, which may cause the disturbance of archaeological resources. Excavation to depths greater than current foundations has the potential to encounter unknown archaeological resources. Additionally, as stated in Section 5.7, *Geology and Soils*, based upon fossils found in similar sediments, the McKinley ES campus is potentially sensitive to paleontological resources, and impacts on unique paleontological resources could be potentially significant. Thus, the potential exists for as-yet undiscovered archaeological resources, paleontological resources, or human remains to be encountered during excavation and grading activities. These topics will be further analyzed in the EIR to evaluate potential impacts and formulate any appropriate avoidance (or mitigation) measures, if applicable.

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

Potential Significant Impact. The Proposed Project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. As described in Sections 5.1 through 5.20 of this Initial Study and Section 5.21(a) above, the Proposed Project could potentially result in significant short-term and long-term impacts to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, and tribal cultural resources. These topics will be further analyzed in the EIR to evaluate potential impacts and formulate any appropriate avoidance (or mitigation) measures, if applicable.

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

Potentially Significant Impact. Potentially significant impacts are identified in this Initial Study related to aesthetics, air quality, cultural resources, energy, geology and soils, paleontological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, and transportation. Cumulative

impacts to the resources for which potentially significant impacts are identified in this Initial Study will be addressed in the EIR. Mitigation measures will be recommended as needed.

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

Potentially Significant Impact. Development of the Proposed Project could create direct and indirect adverse effects on the public and/or the environment. The Proposed Project has the potential to affect human beings through impacts related to aesthetics, air quality, cultural resources, energy, paleontological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, and tribal cultural resources. The significance of these potential impacts will be analyzed in the EIR, and applicable mitigation measures will be identified.

6. References

California Department of Conservation (DOC). 2016. Mines Online. Accessed December 1, 2022. https://maps.conservation.ca.gov/mol/index.html.

———. 2017. State of California Williamson Act Contract Land. Accessed December 1, 2022. https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf.

———. 2022a. California Important Farmland Finder (CIFF). Accessed December 1, 2022. https://maps.conservation.ca.gov/dlrp/ciff/.

———. 2022b. CGS Information Warehouse: Tsunami Hazard Area Map. Accessed December 1, 2022. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=tsunamievacuation.

———. 2022c. CalGEM GIS Well Finder. Accessed December 1, 2022. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-116.42689/36.65438/6.

California Department of Forestry and Fire Protection (CAL FIRE). 2011, September. Very High Fire Hazard Severity Zones in LRA. Accessed December 1, 2022. https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf

CalRecycle. 2019a. SWIS Facility/Site Activity Details Chiquita Canyon Sanitary Landfill (19-AA-0052). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037.

———. 2019b. SWIS Facility/Site Activity Details Sunshine Canyon City/County Landfill (19-AA-2000). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702.

California Department of Transportation (Caltrans). 2019. California State Scenic Highway System Map. Accessed December 1. 2022. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

California Division of Safety of Dams (DSOD). 2022. Dam Breach Inundation Map Viewer. Accessed December 1, 2022. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2.

California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf.

6. References

Cogstone. 2022, August. Archaeological and Paleontological Resources Assessment for the McKinley Elementary School Campus Master Plan Project, City of Santa Monica, Los Angeles County, California.

Converse Consultants. 2021, December 9. Geotechnical Investigation Report.

Department of Toxic Substances Control (DTSC). 2022. EnviroStor. Accessed December 1, 2022. https://www.envirostor.dtsc.ca.gov/public/map/.

Federal Emergency Management Agency (FEMA). 2021, December. FEMA Flood Map Service Center: Search By Address. Accessed December 1, 2022.

Historic Resources Group (ARG). McKinley Elementary School, Santa Monica, CA, Historic Resources Inventory Report. January 2022.

IBI Group. McKinley ES Access and Pedestrian Safety Analysis. 2022, September 15.

Los Angeles County Airport Land Use Commission (Los Angeles ALUC). 2003, May 13. Santa Monica Airport, Airport Influence Area. Accessed December 1, 2022. https://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf.

———. 2004, December 1. Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan. Accessed December 1, 2022. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf.

Alta Environmental (NV5). 2022, April 19. Phase I Environmental Site Assessment Report.

Santa Monica, City of. 2015, July 24. Santa Monica Land Use and Circulation Element. Accessed December 1, 2022. https://learn.sharedusemobilitycenter.org/wp-content/uploads/policy-documents-4/Santa%20Monica_Revised%20LUCE%207.24.15_web.pdf.

———. City of. September 26, 2017. City Council Meeting Agenda Item 8.A. https://publicdocs.smgov.net/WebLink/0/edoc/2348965/SR-09-26-2017-8A.pdf.

———. 2018a. *Local Coastal Plan 2018 Update*. https://www.smgov.net/Departments/PCD/Plans/Local-Coastal-Plan-2018-Update/

———. June 2021. 2020 Urban Water Management Plan. https://santamonica.gov/media/Users/smgov_5Calfredo_2Egonzalez/WRPP/2020_UWMP.pdf.

———. 2022a. *Master Facility Use Agreements with the Santa Monica-Malibu Unified School District*. https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=36030435&AID=255645&MID=11599

———. 2022b, December 1. GIS Open Data Portal, Airport Noise Contours. Accessed December 1, 2022. https://gisdata.santamonica.gov/datasets/smgov::airport-noise-contours/explore?location=34.075982%2C-118.214350%2C9.95.

6. References

Santa Monica-Malibu Unified School District (SMMUSD). 2017. All-Hazard Mitigation Plan. Accessed December 1, 2022. http://fip.smmusd.org/downloads/HazardMitigationPlan091117.pdf.

———. 2018, February. School Safety Plan. Accessed December 1, 2022. https://ca50000164.schoolwires.net/cms/lib/CA50000164/Centricity/Shared/SchoolSafetyPlan.pdf

———. 2019. February. Districtwide Plan for Sustainability. http://fip.smmusd.org/Sustainability032119.pdf.

———. 2019, April. Accessed December 1, 2022. https://www.smmusd.org/cms/lib/CA50000164/Centricity/Domain/4171/Ed-Specfications.pdf.

———. 2023. Santa Monica-Malibu Unified School District Board of Education. February 17, 2022. https://simbli.eboardsolutions.com/SB_Meetings/ViewMeeting.aspx?S=36030435&MID=9729

Santa Monica Fire Department (SMFD). 2022. Fire Station 5. Accessed at https://www.santamonica.gov/places/fire-stations/fire-station-5.

Santa Monica Police Department (SMPD). 2021, December. Santa Monica PD Biennial Report 2019 to 2020. Accessed December 28, 2021. https://www.youtube.com/watch?v=WlEGBlQKaUI.

South Coast Air Quality Management District (South Coast AQMD). 1993. California Environmental Quality Act Air Quality Handbook.

State Water Resources Control Board (SWRCB). 2022. GeoTracker. Accessed December 1, 2022. https://geotracker.waterboards.ca.gov/map/.

US Environmental Protection Agency (US EPA). 2022. Criteria Air Pollutants. https://www.epa.gov/criteria-air-pollutants.

U.S. Fish and Wildlife Service. (USFWS) 2022. Wetlands Mapper. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

6. References

This page intentionally left blank.

7. List of Preparers

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Carey Upton, Chief Operations Officer

MASSETTI CONSULTING, LLC

Julian Capata, Facility Improvement Projects

Michael Burke, Design Manager

PLACEWORKS

Addie Farrell, Principal

Arabesque Said-Abdelwahed, Senior Associate

Alen Estrada-Rodas, Associate

Danielle Clendening, Planner

Steve Bush, Senior Engineer

Dina El Chammas, Senior Engineer

John Vang, Senior Associate

Kristie Nguyen, Associate

Cary Nakama, Graphic Designer

Alta Environmental DBA NV5

Cogstone

John Gust, Ph.D., RPA

Kim Scott, M.S.

Sandy Duarte, B.A.

Kelly Vreeland, M.S.

Leighton Consulting, Inc.

Carl Kim, Senior Principal Engineer

7. List of Preparers

Joe Roe, Principal Geologist

Eric M. Holiday, Senior Project Geologist

Historic Resources Group

IBI Group

Mike Arizabal, Senior Transportation Planner