May 2023 | Final Environmental Impact Report
State Clearinghouse No. 2023010230

MCKINLEY ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT

for Santa Monica-Malibu Unified School District

Prepared for:

Santa Monica-Malibu Unified School District
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PLACEWORKS

Table of Contents

Table of Contents

List of Figures

Figure **Page**

1. Introduction

1.1 INTRODUCTION

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

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

(a) The Draft Environmental Impact Report (DEIR) or a revision of the DEIR;

(b) Comments and recommendations received on the DEIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies that provided comments on the DEIR;

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process;

(e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the McKinley Elementary School Campus Master Plan Project Final EIR (Proposed Project) during the public review period, which began March 21, 2023, and ended May 5, 2023. This document represents the independent judgment of Santa Monica-Malibu Unified School District (SMMUSD or District), who is the Lead Agency for the Proposed Project. This document and the circulated DEIR make up the FEIR, in accordance with CEQA Guidelines section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

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

Section 2, Response to Comments. This section provides a list of agencies, organizations, and interested persons commenting on the DEIR, copies of comment letters received during the public review period, and individual responses to written comments. This section also includes responses to written and verbal comments received at a public meeting held by the SMMUSD on April 18, 2023, regarding the DEIR. To facilitate review of the responses, each comment letter and verbal comment has been reproduced and assigned a number (A1 through A3 for letters/emails received from agencies; O1 for a letter/email from one organization; and R1 through R5 for letters/emails and verbal comments received from residents). Individual comments within each letter have been numbered and the letter is followed by responses with references to the corresponding comment number.

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

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

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

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

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

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

2. Response to Comments

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

This section provides all written responses received on the DEIR and SMMUSD's responses to each comment.

Comment letters/emails and specific comments are given letters and numbers for reference purposes. Changes to the DEIR text are shown in double underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

Number Reference	Commenting Person/Agency	Comment Format	Date of Comment	Page No.
Agencies				
A1	City of Santa Monica, Public Works Department – Water Resources	Email	May 5, 2023	2-3
A2	City of Santa Monica, Department of Transportation, Mobility Division	Letter	May 4, 2023	2-9
A3	Department of Toxic Substances Control	Letter via Email	April 26, 2023	2-13
Organizations				
O1	Santa Monica Families for Safe Streets	Letter/Email	May 3, 2023	2-19
Individuals				
R1	John Agoglia	Verbal	April 18, 2023	2-45
R2	Juan Matute	Verbal	April 18, 2023	2-47
R3	Neal Gardner	Verbal	April 18, 2023	2-49
R4	Ron Groezinger	Verbal	April 18, 2023	2-51
R5	Mari Ostendorf	Letter/Email	May 2, 2023	2-53

2. Response to Comments

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Letter A1 – City of Santa Monica, Public Works Department – Water Resources (2 pages)

From: Alex Waite <Alex.Waite@santamonica.gov>
Date: May 5, 2023 at 3:32:30 PM PDT
To: "Upton, Carey" <cupton@smmusd.org>
Cc: Sunny Wang <Sunny.Wang@santamonica.gov>
Subject: McKinley Elementary School Campus Master Plan Project

Hello Carey,

The City of Santa Monica Public Works Department, Water Resources Division (City), appreciates the opportunity to provide comments on the Santa Monica-Malibu Unified School District McKinley Elementary School Campus Master Plan Project (Project) Draft Environmental Impact Report (DEIR). A1-1

The City owns and operates all potable water and sewerage systems within the City of Santa Monica serving approximately 93,000 people and over 18,000 service connections. Additionally, the City owns and operates a recycled water distribution system serving customers for non-potable applications such as irrigation landscaping and toilet flushing. The recycled water distribution system is served by the City's Santa Monica Urban Runoff Recycling Facility and new Sustainable Water Infrastructure Project Advanced Water Treatment Facility (SWIP AWTF), together producing approximately 1.5 million gallons per day of advanced treated recycled water. This recycled water represents a new, drought-resilient, and sustainable water supply to offset imported water use and reduce the City's overall carbon footprint. In 2022, the City enacted a new recycled water ordinance, Santa Monica Municipal Code (SMMC) 7.12.170, regulating the use of recycled water. The SWIP and the use of recycled water to offset imported potable water supplies are key components of the City's goal to become water self-sufficient as identified in the City's 2018 Sustainable Water Master Plan. Please visit the City's website to learn more about the Sustainable Water Master Plan, SWIP and recycled water ordinance: santamonica.gov – Sustainable Water Infrastructure Project (SWIP). A1-2

2. Response to Comments

The Project DEIR states approximately 125,000 square feet of new development is proposed. This additional square footage, including new classrooms and playground space, represents a significant increase on the overall water demand for the McKinley Elementary School property compared to current demand. The increase in water demand presented by this Project may limit the City's ability to meet its local water self-sufficiency goals by necessitating additional imported water deliveries and may also require additional infrastructure improvements, such as replacing distribution pipelines with larger diameter pipes, to serve the Project. To mitigate the environmental impact of increased potable water demand generated by the Project, the City strongly recommends using recycled water to meet all applicable non-potable water applications identified in SMMC 7.12.170 and California Code of Regulations Title 22. The City is in the process of extending the recycled water main to Cloverfield Boulevard and Santa Monica Boulevard at the southern corner of the Project area with an expected completion of Summer 2024. Connecting the Project area to the recycled water distribution system is anticipated to require limited additional infrastructure with significant benefits to the Project in terms of reducing potable water demand and consequently imported water delivery to the City, reducing overall carbon footprint, and promoting sustainable building and potable water conservation practices.

A1-3

Please contact the Water Resources Division at alex.waite@santamonica.gov or (424) 299-6733 to learn more about the use of recycled water for the Project as well as opportunities to use recycled water at other Santa Monica-Malibu Unified School District campuses.

A1-4

Thank you,

Alex Waite, P.E.
Supervising Civil Engineer
City of Santa Monica, Public Works Department – Water Resources
2500 Michigan Ave., Building 1, Santa Monica, 90404
Office: 424.299.6733
Email: alex.waite@santamonica.gov

City of Santa Monica

A1. Response to Comments from City of Santa Monica, Public Works Department – Water Resources, dated May 5, 2023.

A1-1 This comment contains general or introductory information.

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

A1-2 The comment provides a description of the City's potable water, recycled water, and sewerage systems. It provides a description of the City's distribution of recycled water which is served by the Santa Monica Urban Runoff Recycling Facility and the Sustainable Water Infrastructure Project Advanced Water Treatment Facility (SWIP AWTF). Additionally, the comment describes policies and goals enacted by the City to regulate the use of recycled water and to become water self-sufficient.

Pages 5.8-6 and 5.8-7 of the DEIR provide a listing of state and City code and policy documents, including the City's Groundwater Sustainability Plan, Water Neutrality Ordinance, and Efficient Landscape and Irrigation Standards. In response to the comment, a description of Santa Monica Municipal Code (SMMC) 7.12.170 and the 2018 Sustainable Water Master Plan have been added as revisions to the DEIR.

The proposed revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; nor suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but SMMUSD declines to adopt it.

A1-3 The comment states that an additional 125,000 square feet of development on the campus (classrooms and playground) that would result from the Proposed Project would represent a significant increase in water demand for the McKinley ES campus compared to current demand. And that this increased water demand may limit the City's ability to meet local water self-sufficiency goals because the campus would require additional imported water, and because the campus may also require new infrastructure improvements (replaced water distribution pipelines). The comment recommends using recycled water to meet all applicable non-potable water requirements in order to mitigate the potential increased water demands. The comment states that the City is in the process of extending the recycled water main to Cloverfield Boulevard and Santa Monica Boulevard just south of the Proposed Project's Site (estimated completion 2024).

The Project involves modernization of the existing McKinley ES campus. The net increase in square footage would be 119,113, a bit less than stated in the comment. Despite this square footage increase, water demand would not significantly increase. The Proposed Project would not increase capacity or enrollment of students, faculty, or staff at

2. Response to Comments

McKinley ES. While the total amount of square footage to be developed by the Project would exceed current square footages of existing school facilities, this increase in square footage is needed in order to replace undersized and inflexible facilities with larger, flexible spaces that accommodate modern, diverse learning styles and allow for variable uses, such as rotational learning in the classroom and project-based learning that allows simultaneous individualized, small group, and large group instruction (Project Objective #3) and provide enhanced, modern support spaces that already exist—such as libraries, cafeteria, labs, maker spaces, and other student services (Project Objective #4). The total number of faculty, staff and students (those who consume water and drive demand) would not change with the additional square feet of physical development.

Additionally, the Proposed Project would include replacement of existing water infrastructure with efficient low-flow fixtures, as stated on page 3-31 of the DEIR, and 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 new building spaces would accommodate the current capacity of students and provide access to water and restrooms in closer proximity as opposed to current conditions in which students walk to other buildings from the portable classrooms. The facilities and water infrastructure would serve to meet existing demand.

Regarding outdoor landscaping, the total landscaped/irrigated areas onsite would increase by 0.68 acres after completion of phased development as shown on Page 5.11-14 of the DEIR. However, irrigation for landscaped areas would be, in part, supplied with an on-site cistern that captures stormwater from the onsite LID features and pumps it to the on-site irrigation system, as described on page 90 of the Initial Study (Appendix B of the DEIR). Therefore, upon completion of the Proposed Project, the water demand for irrigation is anticipated to be similar to or less than current conditions.

Regarding infrastructure that delivers water, utility improvement connections necessary to serve the modernized buildings would be constructed by the District as part of the Proposed Project, as described on Page 3-32 of the DEIR. Given overall demand for potable water is anticipated to be similar to current conditions, there is no need to increase the capacities of water mains.

While the District does not anticipate the need to rely on recycled water to maintain similar water consumption rates as the current conditions as described above, the District, similar to the City, is committed to sustainable practices and development. The District is committed to coordinating with the Santa Monica Public Works Department – Water Resources regarding the timing of the installation of the recycled water main in Cloverfield Avenue, and potential connections to McKinley ES, based on phasing of construction as proposed by the Project.

The comment neither identifies a deficiency in the EIR's analysis nor a new or exacerbated potential significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

A1-4 This comment provides general and contact information to learn more about the use of recycled water options.

This comment is not a direct comment on the content or adequacy of the DEIR and does not raise a specific environmental issue; therefore, no further response is required.

2. Response to Comments

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Letter A2 – City of Santa Monica, Department of Transportation, Mobility Division (1 page)

City of Santa Monica

Department of Transportation, Mobility Division

May 4, 2023

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District

Dear Mr. Upton,

Thank you for including the City of Santa Monica in review of the Draft Environmental Impact Report (EIR) for the Santa Monica-Malibu Unified School District (SMMUSD/District) McKinley Elementary School Campus Master Plan Project. The Proposed Project would renovate and modernize the existing campus to develop new and renovated facilities with no change to existing student capacity, enrollment, or staffing. The City acknowledges that the project would be entirely within the McKinley ES campus, and no offsite improvements are proposed by the District. A2-1

The City of Santa Monica is committed to designing and constructing streets to enhance the safety of students, particularly those rolling, walking, or bicycling, to and from school. We leverage local transportation funds to construct school related infrastructure projects. In Spring 2017, the City's Safe Routes to School (SRTS) program hosted walking audits with SMMUSD and school staff, parents/caregivers, and city staff to collect input to inform recommendations for street redesign and safety treatments at multiple District campuses, including McKinley ES. As a result of this collaborative process, Safe Routes to School improvements around McKinley ES have been identified and the design work is underway. The City met with the District on February 16, 2023 to discuss the improvements and the timing for implementation. A2-2

Upon completion of the designs, the City will be seeking construction bids for the development of those identified SRTS improvements. Once the procurement process is complete, we anticipate construction to occur in 2024. A2-3

Sincerely,

Jason Kligier, AICP
Mobility Division Manager

1685 Main Street, Mail Stop 38, Santa Monica, California 90401
santamonica.gov • @cityofsantamonica • @santamonicacity

2. Response to Comments

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A2. Response to Comments from City of Santa Monica, Department of Transportation, Mobility Division, dated May 4, 2023.

A2-1 This comment contains introductory or general information. The comment provides a description of the Proposed Project and acknowledgement that the Proposed Project would be developed entirely within the McKinley ES campus, and that no offsite improvements are proposed.

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

A2-2 This comment states the City of Santa Monica's goals to provide Safe Routes to School (SRTS) for students. The comment provides a description of the City's SRTS program. The City indicates improvements around the McKinley ES campus have been identified, and design work for the proposed improvements is in progress. The City indicates a meeting was held with the District during preparation of the DEIR.

The comment is acknowledged. Page 5.12-4 of the DEIR lists the SRTS projects that have been identified by the City that are generally referenced in this letter. The District is committed to continuing to work with the City during implementation of these City-initiated SRTS projects. These City-initiated SRTS projects are additional, but separate pedestrian and vehicular improvements to those that are included on campus, as described in the Project Description. This comment is not a direct comment on the content or adequacy of the DEIR and does not raise a specific environmental issue; therefore, no further response is required.

A2-3 This comment states that the City will be seeking construction bids for the development of improvements identified in the SRTS program, and anticipate construction beginning in 2024.

The District appreciates this update and commitment to implementing the SRTS projects that were identified with City, staff, and caretakers, and will continue to coordinate with the City as needed through implementation. This comment is not a direct comment on the content or adequacy of the DEIR and does not raise a specific environmental issue; therefore, no further response is required.

2. Response to Comments

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Letter A3 – Department of Toxic Substances Control (3 pages)

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
5796 Corporate Avenue
Cypress, California 90630

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 26, 2023

Mr. Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
1717 4th Street
Santa Monica, CA 90401
cupton@smmusd.org

RE: MCKINLEY ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT
DATED MARCH 21, 2023 (STATE CLEARINGHOUSE NUMBER: 2023010230)

Dear Mr. Upton:

The Department of Toxic Substances Control (DTSC) received a Notice of Completion (NOC) of a Draft Environmental Impact Report (DEIR) for the McKinley Elementary School Campus Master Plan Project (Project). The Proposed Project would renovate and modernize the existing campus to develop new and renovated facilities that would support a project-based learning approach at McKinley Elementary School (ES) that would expand instructional strategies currently in place within the district and would address future learning that is flexible, adaptable, and project-centered in its delivery. The Proposed Project would be constructed in three phases and would occur over approximately 5.70 acres of the 6.48-acre campus. Redevelopment and modernization of McKinley ES includes the demolition and removal of some existing structures, renovation of structures to remain, and construction of two new buildings and outdoor facilities. Eleven existing portable classrooms (B1 through B11), playground restrooms, one modular building (Building D), and one elevator (serving Building B and C) would be

A3-1

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2. Response to Comments

selectively demolished and removed as part of the Proposed Project, for a total of 82,505 square feet of demolition over 3 phases. Each phase of the Proposed Project is dependent on funding availability. Phase 1 is funded, and the design is complete. The Proposed Project would provide fourteen new classrooms, new and reconfigured playfields/playgrounds, and parking lots, for a total of 137,030 square feet of building space on the McKinley ES campus. At completion, the Proposed Project would result in a total of thirty-three classrooms, from preschool through fifth grade, including special education, and dedicated outdoor play areas for preschool through kindergarten for a total of 182,284 square feet of building space.

A3-1 Cont'd

DTSC has identified that the Project's DEIR includes a Phase I Environmental Assessment (Phase I) in Appendix I. The Phase I was submitted separately to DTSC for review on September 27, 2022. DTSC issued a determination letter on the Phase I on October 26, 2022. The letter and additional information on McKinley Elementary School (60003412) Site can be found on EnviroStor DTSC determined that a completion of Preliminary Environmental Assessment (PEA) is needed for the Site to address, but may not be limited to, the Recognized Environmental Conditions identified in the Phase I.

If state funding is anticipated, then preparation of a PEA is required with DTSC's oversight pursuant to California Education Code prior to the new development or any construction. For school projects that do not require state funding, DTSC recommends environmental review under the DTSC school program oversight to ensure the school is safe for students and staff.

A3-2

DTSC appreciates the opportunity to comment on the NOP and proposed DEIR. Should you need any assistance with evaluating and cleaning-up school sites, please visit DTSC's Site Mitigation and Restoration Program page and follow the 3-Step-Process.

If you have any questions, please contact Lina Hijazi, Project Manager at (714) 484-5334 or via email at Lina.Hijazi@dtsc.ca.gov.

A3-3

Mr. Upton
April 26, 2023
Page 3

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
CEQA Unit-Permitting/HWMP
Department of Toxic Substances Control

cc: (via email)
Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Ms. Lina Hijazi
Project Manager
Site Mitigation and Restoration Program
Department of Toxic Substances Control
Lina.Hijazi@dtsc.ca.gov

Mr. Dave Kereazis
Associate Environmental Planner
CEQA Unit-Permitting/HWMP
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

2. Response to Comments

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A3. Response to Comments from Department of Toxic Substances Control, dated April 26, 2023.

A3-1 This comment contains introductory information and a summary description of the Proposed Project.

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

A3-2 This comment states that the Proposed Project Phase I Environmental Site Assessment (ESA) was reviewed by the Department of Toxic Substances Control (DTSC), and a Preliminary Environmental Assessment (PEA) would be required to address Recognized Environmental Conditions (RECs) identified in the Phase I ESA if State funding is anticipated for the Proposed Project.

The Proposed Project would not seek or require State funding. As stated on page 5.7-14 of the DEIR, the management, use, storage, and transportation of such hazardous materials is subject to current local, state, and federal laws. Compliance with regulatory requirements and implementation of Mitigation Measures HAZ-1 and HAZ-2 would ensure that such materials would be properly removed, handled, and disposed. These measures would minimize the potential for the release of hazardous building materials and soil contaminants during construction activities and would ensure that students, faculty, and visitors at McKinley ES and surrounding residences are not exposed to hazardous material releases.

Additionally, in compliance with section 17268 and 17213 of the California Education Code, SMMUSD, as the lead agency, may approve a project for the construction of a new school building, if the project and the lead agency comply with the same requirements specified in subdivision (a) of section 17213 for school site acquisition; which states:

The governing board of a school district shall not approve a project involving the acquisition of a school site by a school district, unless all of the following occur:

a. The school district, as the lead agency, as defined in Section 21067 of the Public Resources Code, determines that the property purchased or to be built upon is not any of the following:

    1. The site of a current or former hazardous waste disposal site or solid waste disposal site, unless if the site was a former solid waste disposal site, the governing board of the school district concludes that the wastes have been removed.

    2. A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Article 5 (commencing with Section 78760) of Chapter 4 of Part 2 of Division 45 of the Health and Safety Code for removal or remedial action pursuant to Part 2 (commencing with Section 78000) of Division 45 of the Health and Safety Code.

2. Response to Comments

3. A site that contains one or more pipelines, situated underground or aboveground, that carries hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood.

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

A3-3 This comment provides general and contact information.

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

Letter O1 – Santa Monica Families for Safe Streets (10 pages)

McKinley Master Plan Draft EIR Comments

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

Draft EIR Comments Regarding McKinley Elementary School Campus Master Plan Project (SCH #2023010230)

From Juan Matute and Santa Monica Families for Safe Streets
May 3, 2023

Applicability of EIR Scoping Comments to Greenhouse Gas Emissions (GHG)

The Draft Environmental Impact Report (DEIR) for the McKinley Elementary School Campus Master Plan Project erroneously states that no Scoping comments were received on GHG emissions. We believe that the comments submitted by Santa Monica Families for Safe Streets on the implementation of Safe Routes to School projects apply to both GHG emissions and transportation. O1-1

2. Response to Comments

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

The transportation comments previously submitted by Santa Monica Families for Safe Streets states that the proposed project, without Safe Routes to School implementation measures likely conflicts with an applicable GHG reduction plan (the Southern California Association of Governments 2020 Sustainable Communities Strategy/Regional Transportation Plan, or SCAG 2020 SCS/RTP):

O1-2

DEIR Section 5.12.3.2 states, without providing supporting evidence, a finding that:

> "Construction and operation of the Proposed Project would not prohibit or interfere with the RTP/SCS GHG per-capita reduction targets of 8 percent by 2020 and 19 percent by 2035, or the associated reduction in VMT per capita for year 2045 by 4.1 percent compared to baseline conditions for the year."

Santa Monica Families for Safe Streets argues that there is substantial evidence that the proposed project is inconsistent with SCAG's 2020 RTP/SCS and therefore the DEIR is inadequate. Santa Monica Families for Safe Streets also proposes a framework for a mitigation measure that, if developed to meet CEQA's standards for effective and adequate mitigation measures and included in the final EIR, would result in an adequate EIR. The next sections of this comment detail our argument and the potential remedy.

O1-3

Safe Routes to School is one of 20 Strategies in the applicable Sustainable Communities Strategy

Government Code § 65080 requires Metropolitan Planning Organizations, like the Southern California Association of Governments (SCAG), to prepare a Sustainable Communities Strategy (SCS) that demonstrates how the region will achieve prescribed targets for per-capita reductions in greenhouse gas emissions from passenger vehicles and light duty trucks. Prior to the 2020 Regional Transportation Plan/Sustainable Communities Strategy, the California Air Resources Board (CARB) set the 2035 per-capita target for the Southern California Association of Governments at 19%. This plan, SCAG's 2020 RTP/SCS, is the applicable greenhouse gas reduction plan for passenger vehicles and light duty truck transportation in the Southern California Region.

O1-4

Page 27 of the Final Connect SoCal Sustainable Communities Strategy Technical Report Adopted on September 3, 2020 section on GHG Reduction Approach lists 20 "strategies, policies and measures that help per-capita reduce greenhouse gas emissions." The Technical Report states "These strategies, measures and policies collectively result in approximately 14 percent per-capita GHG reductions using the Activity Based Model, and 5 percent reductions using off-model methodologies." One of these 20 listed strategies, policies, and measures is "Safe Routes to School (Active Transportation Technical Report)". This evidence supports the argument that safe routes to school implementation in Santa Monica was anticipated by this applicable greenhouse gas reduction plan.

2

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

Safe Routes to School infrastructure in Santa Monica are included within the SCS's strategies, policies, and measures

Safe Routes to School is a program that includes education, encouragement, and engineering (infrastructure) to support safe biking and walking to school. In describing off-model methodologies, it is clear that Safe Routes to School infrastructure improvements are the critical implementation measure to attain the -19% GHG target. These off-model methodologies are described in the SCAG Final Connect SoCal 2020 RTP/SCS Active Transportation Technical Report as including:

> "SAFE ROUTES TO SCHOOL INFRASTRUCTURE Safe Routes to School (SRTS) strategies aim to increase the number of children walking and bicycling to school by implementing infrastructure improvements to the pedestrian and bicycle network within a specified distance from a school. SRTS strategies are comprehensive approaches to reduce the number of Single Occupant Vehicle (SOV) trips to schools and shorten commute trips where one stop of the trip is at a school. SRTS infrastructure strategies include a variety of implementation approaches that complement and build off of the larger pedestrian and bicycle infrastructure strategies by focusing on improvements within school service areas and improvements to school sites themselves. These include crossing and intersection improvements, bikeways, bicycle/skateboard parking, improvements to drop-off and pick-up areas to reduce conflicts, and safety improvements to monitor and reduce traffic speeds. Implementation of safe routes to school infrastructure should follow a community engagement process centered on environmental justice.
>
> - Strategy 1 – Complete school-area improvements to pedestrian and bicycle networks, drop-off areas and school sites to improve safety and reduce conflicts with vehicles.
> - Strategy 2 – Install school site improvements for storage of bicycles, skateboards and other micro-mobility devices.
> - Strategy 3 – Implement vehicle speed reductions in school zones (e.g., 15 miles per hour) per the California Vehicle Code."

The Technical Report notes that "Safe Routes to School Plans for nearly 200 schools within the SCAG region, and 13 first-last mile plans for projects throughout the SCAG region were analyzed to identify cost estimates." The City of Santa Monica's Bike Action Plan, Pedestrian Action Plan, and Safe Routes to School program are referenced in tables 12, 13, and 14 of this Technical Report.

Therefore, there is a fair argument that the Southern California Association of Governments anticipated implementation of Safe Routes to School infrastructure projects as measures to comply with SB 375.

O1-4 Cont'd

The applicable Greenhouse Gas Reduction Plan's Program EIR relies on these off-model adjustments

The Certified Final Connect Socal (2020 RTP/SCS) Program Environmental Impact Report.

O1-5

3

2. Response to Comments

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

"Table 3.8-10, SB 375 Analysis" contains a footnote, "/c/ Includes off-model adjustments for 2035 and 2045" which indicates that the off-model adjustments are part of the SCAG-certified EIR.

Table 3.8-10
SB 375 Analysis

	2005 (Baseline)	2020 (Plan)	2035 (Plan)
Resident population (per 1,000)	17,161	19,194	21,110
CO2 emissions (per 1,000 tons)	204.0/a/	204.5/b/	198.6/b/
Per capita emissions (pounds/day)	23.8	21.3	18.8
% difference from Plan (2020) to Baseline (2005)			–8%
% difference from Plan (2035) to Baseline (2005)			–19%/c/

Note:
/a/ Based on EMFAC2007
/b/Based on EMFAC2014 and SCAG modeling, 2019.
/c/ Includes off-model adjustments for 2035 and 2045
Source: SCAG modeling, 2019.
http://www.scag.ca.gov/committees/CommitteeDocLibrary/jointRCPC110515fullagn.pdf

The DEIR asserts, without sufficient evidence, that the project would not conflict with an applicable GHG reduction plan

O1-5 Cont'd

DEIR Section 5.12.3.2 states, without providing evidence, a finding that "Construction and operation of the Proposed Project would not prohibit or interfere with the RTP/SCS GHG per-capita reduction targets of 8 percent by 2020 and 19 percent by 2035, or the associated reduction in VMT per capita for year 2045 by 4.1 percent compared to baseline conditions for the year."

DEIR Impact 5.6-2 states "The Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. [Threshold GHG-2])"

> "The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. Nevertheless, the Proposed Project would redevelop and modernize facilities for the existing and future students of McKinley ES within an existing operational school campus and would not change underlying zoning or uses on the Proposed Project's Site. The Proposed Project would continue to serve the local student population within the surrounding communities. Since the modernization of the existing school campus would continue to be a local-serving land use, and because the Proposed Project would not result in an increase in student capacity or staff, the Proposed Project would not generate an increase in VMT. Therefore, the Proposed Project would

4

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

not interfere with SCAG's ability to implement the regional strategies in Connect SoCal, and impacts would be less than significant."

However the SMMUSD-proposed threshold here of "not generating an increase in VMT" does not apply here as the SCAG RTP/SCS proposes implementation of Safe Routes of School projects as part of VMT *reduction* measures that demonstrate compliance with the California Air Resources Board's targets for the Southern California Region (-19%).

O1-5 Cont'd

After triggering CEQA, the threshold for significance is **plan consistency.** By not proposing or incorporating Safe Routes to School Projects as part of the project description or mitigation measures, the project therefore "conflicts with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gases" (CEQA guidelines Appendix G, VII - Greenhouse Gas Emissions b)

If the project is inconsistent with an applicable greenhouse gas reduction plan, as we assert here, then the VMT threshold for GHG analysis is not the baseline (no change in pre-project trip attraction VMT) but rather some percentage *below* the baseline (approx 19% below the baseline). Thus if the EIR does not establish consistency with the SCS, it is not eligible for tiering from the SCSs' Program EIR and would require additional environmental review to support a finding of significance. Furthermore, to establish consistency with the negative target of the SCS, a VMT-based project-level model's threshold of significance would be a 5% to 19% reduction in VMT as a result of project implementation. It is unclear how this claim would be supported without either implementation of parking pricing or the proposed Safe Routes to School mitigation measure, neither of which are contained in the DEIR.

O1-6

Plan Consistency Establishes Tiering of GHG Impacts Under an SCS with an Adopted and Certified PEIR

Establishing consistency with applicable plans, particularly the RTP/SCS, is essential to validly tiering from that previous plan's analysis. This is why the CEQA Guidelines Appendix G asks if the project will "Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?"

CEQA Guidelines at 14 CCR § 15152 allow lead agencies preparing EIRs to tier environmental review from previously-adopted and certified applicable Program, Master, or Plan EIRs. An adopted Program EIR provides a shield against which individual project or plan EIRs can tier. The SCAG RTP/SCS and Santa Monica Land Use and Circulation Element *LUCE) are Program EIRs that enable tiering - or reliance on prior environmental review to address impacts that are often indirect or cumulative in nature. The RTP/SCS framework set forth by SB 375 and subsequent amendments enables tiering of greenhouse gas impacts. Without the ability to tier, each project would have to analyze cumulative greenhouse gas emissions.

O1-7

5

2. Response to Comments

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

CEQA Guidelines Appendix G plan consistency requirement is a shortcut for whether or not the project can tier from the EIR of a prior applicable Greenhouse Gas Reduction plan.

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

O1-7 Cont'd

CEQA Guidelines at 14 CCR § 15183.5 establishes the specific procedures a lead agency (in this case, SCAG) may use to establish tiering of Greenhouse Gas impacts as provided in § 15152.

> (a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic review. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).
> (b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.
>
> (1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:
>
> (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
> (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
> (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
> **(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;**
> (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
> (F) Be adopted in a public process following environmental review.
>
> (2) Use with Later Activities. A plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must

O1-8

6

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of greenhouse gas emissions, an EIR must be prepared for the project.
(c) Special Situations. As provided in Public Resources Code sections 21155.2 and 21159.28, environmental documents for certain residential and mixed use projects, and transit priority projects, as defined in section 21155, that are consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in an applicable sustainable communities strategy or alternative planning strategy need not analyze global warming impacts resulting from cars and light duty trucks. A lead agency should consider whether such projects may result in greenhouse gas emissions resulting from other sources, however, consistent with these Guidelines. Cal. Code Regs. Tit. 14, § 15183.5

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65457, Government Code; Sections 21003, 21061,21068.5, 21081(a)(2), 21081.6, 21083.05, 21083.3, 21093, 21094, 21100, 21151, 21155, 21155.2, 21156, 21157, 21157.1, 21157.5, 21157.6, 21158, 21158.5 and 21159.28, Public Resources Code; California Native Plant Society v. County of El Dorado (2009) 170 Cal.App.4th 1026; and Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th 1099.

1. New section filed 2-16-2010; operative 3-18-2010 (Register 2010, No. 8).

O1-8 Cont'd

Santa Moncia Families for Safe Streets asserts that the McKinley Master Plan DEIR, without the Safe Routes to School measures, is inconsistent with the SCS and ineligible for tiering under 14 CCR § 15183.5 (a)(1)(D):

> "Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;"

Our technical analysis and the above cited section of the CEQA guidelines establish the argument for the inapplicability of tiering. Public Resources Code § 21094 is included below to demonstrate SMMUSD's legal requirement to establish consistency with the SCAG 2020 RTP/SCS's PEIR.

O1-9

Public Resources Code § 21094. LATER PROJECTS; TIERED ENVIRONMENTAL IMPACT REPORTS; INITIAL STUDY; USE OF PRIOR REPORTS

(a) Where a prior environmental impact report has been prepared and certified for a program, plan, policy, or ordinance, the lead agency for a later project that meets the requirements of this section shall examine significant effects of the later project upon the environment by using a tiered environmental impact report, except that the report on the later project is not required to examine those effects that the lead agency determines were either of the following:

7

2. Response to Comments

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

(1) Mitigated or avoided pursuant to paragraph (1) of subdivision (a) of Section 21081 as a result of the prior environmental impact report.
(2) Examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

(b) This section applies only to a later project that the lead agency determines is all of the following:
(1) Consistent with the program, plan, policy, or ordinance for which an environmental impact report has been prepared and certified.
(2) Consistent with applicable local land use plans and zoning of the city, county, or city and county in which the later project would be located.
(3) Not subject to Section 21166.

O1-9 Cont'd

Because the proposed project is inconsistent with the SCAG 2020 RTP/SCS, SMMUSD's proposed project, at both the initial study and DEIR phase, violates PRC § 21094 (b)(1) and therefore makes forfeits the ability to tier analysis and mitigation of GHG emissions from passenger vehicles and light duty trucks from the SCS's PEIR.

To avoid the additional environmental review that is required from the project as currently proposed, Santa Monica Families for Safe Streets proposes an additional transportation mitigation measure:

Why:	To establish consistency with the Southern California Association of Governments 2020 Regional Transportation Plan/Sustainable Communities strategy and safely accommodate the transportation of pupils who walk or bike to school and their caregivers
What:	Work with community stakeholders to update the 2019 McKinley Elementary Safe Routes to School plan and implement this plan. Contribute financially to this plan's development and implementation if the City of Santa Monica determines that funding for the "Six Schools" Safe Routes is inadequate to implement the identified Safe Routes to School improvements at McKinley Elementary.
Who:	City of Santa Monica (responsible agency), with the advice and consultation of SMMUSD and community stakeholders.
Where:	Improvements identified by the City of Santa Monica located in the area within 1,000 feet of the property line of McKinley Elementary School as identified
When	Implement infrastructure component of the updated McKinley Elementary Safe Routes to School plan by December 31, 2025

O1-10

8

Santa Monica Families for Safe Streets

McKinley Master Plan Draft EIR Comments

A nexus and proportionality exists for the school district to pay impact fees to cause implementation of the mitigation measures

Vehicle traffic attracted by the school travels to the same location and at the same time as students walking and biking to school. At SMMUSD's discretion, the McKinley project has incorporated on-site project design features to operate automobile pickup and drop-off more efficiently, resulting in less dwell time for driving parents and possibly facilitating automobile pickup and dropoff that induces additional automobile trips.. This establishes a nexus for the school's trip attraction activity and the active transportation safety impact condition that safe routes to school infrastructure is intended to mitigate.

These project definition and design decisions create additional impacts that must be mitigated, just as any lead agency would if it pursued discretionary action to approve a drive-thru coffee shop next to a school, which would bring trip attraction at the same time that students were walking to school. When CEQA is triggered, these impacts to the SCS-compliant Safe Routes to School Program must be mitigated.

Existing law provides for city-wide mitigation measures such as Transportation Impact Fees (TIF). Santa Monica Municipal Code 9.66 establishes such fees for private development. However, SMMUSD does not pay TIF fees to the City of Santa Monica for its development projects and therefore must cause the safe routes to school infrastructure implementation measure to exist by means other than through the payment of a Transportation Impact Fee.

O1-11

The District anticipated and voters approved the need for traffic control devices as part of the School's capital plan and funding

With Measure SMS the District anticipated and voters approved the need for Traffic Control Devices as part of the school modernization construction program.

Quick-build mitigations are an authorized expenditure for the source of funds used for the project.

The text of Measure SMS, adopted by Santa Monica voters in 2018, allows SMMUSD to use bond proceeds for "traffic control devices." California's Manual of Uniform Traffic Control Devices defines traffic control devices to include: flexible delineators and posts, speed feedback signs, crosswalk markers, and crosswalk barricades. This definition also includes US Reflector Model K71 flexible traffic posts that can be used for pedestrian and bicyclist safety (see exhibit #2 for an example in the City of Los Angeles), a current best practice for quick-build street safety projects. This definition also includes speed feedback signage such as TrafficCalm IQ series or school-specific applications from TAPCO.

O1-12

9

2. Response to Comments

McKinley Master Plan Draft EIR Comments

The DEIR contains a scriber's error that may be indicative of a rushed environmental review that did not consider all applicable changes to CEQA and the SCAG Sustainable Communities Strategy

Appendix K states "The trip generation for *Grant* Elementary School was estimated using the rate published for Land Use Code 520 (Elementary School) in the Institute for Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). The proposed project would not eliminate the school's existing programs, and it is not the intent of the project to expand the school enrollment capacity. The most recent student population figure was 688 students, approximately 48 of which are TK, and Kindergarten students and 640 students in Grades 1 through 5."

O1-13

The Santa Monica Malibu Unified School Districts board meeting records list purchase orders with Placeworks from 10/14/21 to 11/09/21 for the McKinley and Grant Assessment Project of $241,518.00 and $242,693.00 for a total of $484,211 (see Exhibit #1). Given the likely applicability of the Class 14 exemption, any public controversy shall not require preparation of an environmental impact report (PRC § 21082.2(b)).

O1-14

Given that Placeworks was preparing both DEIR documents and that less than two months passed between the Notice of Preparation and Notice of Completion, this scriber's error (and other possible scribers' errors, may indicate that the EIR was *pro forma* and did substantively address environmental issues outside of the Historical Resources category, where the District had seen prior controversy and prospects of litigation. However, this is not a *Focused* EIR and therefore requires review of all potentially significant impacts, including the plan inconsistency detailed above.

O1-15

10

O1. Response to Comments from Santa Monica Families for Safe Streets, dated May 3, 2023.

O1-1 The commenter identifies an error in the DEIR regarding comments provided on the Notice of Preparation (NOP).

In response to this comment, Section 5.6, *Greenhouse Gas Emissions*, of the DEIR has been updated to reflect comments received regarding greenhouse gas emissions (GHG) during the NOP public review period. The changes are shown in Section 3 of the FEIR. The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new potentially significant environmental impact; a substantial increase in the severity of a potentially significant environmental impact; or suggest a Project alternative or Mitigation Measure that would clearly lessen the environmental impacts of the Proposed Project, but the SMMUSD declines to adopt it.

O1-2 The commenter states that without Safe Routes to School (SRTS) implementation measures, the Proposed Project would likely conflict with an applicable GHG emissions reduction plan, which is the Southern California Association of Governments (SCAG) 2020 Sustainable Communities Strategy/Regional Transportation Plan (SCS/RTP) or Connect SoCal. The commenter quotes the DEIR Section 5.12.3.2, "Construction and operation of the Proposed Project would not prohibit or interfere with the SCAG RTP/SCS GHG per-capita reduction targets of 8 percent by 2020 and 19 percent by 2035, or the associated reduction in VMT per capita for year 2045 by 4.1 percent compared to baseline conditions for the year." The commenter states that the DEIR does not include supporting evidence regarding this conclusion.

As discussed in detail below, nothing about the Proposed Project conflicts with the RTP/SCS's GHG reduction goals. As described in the DEIR, the SCAG RTP/SCS is a transportation system long-range vision plan for Southern California to improve mobility options and achieve a more sustainable growth pattern. As stated on page 5.6-23 of the DEIR, the overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). The "Core Vision" in the RTP/SCS includes "…locating housing, jobs, and transit closer together…" "***Connect SoCal*** will help residents thrive, ***providing better access to*** jobs, housing, ***schools***, healthcare, recreation and everything in between." (*Id.* p. 12, emph. added.) The SCAG RTP/SCS is a foundational planning document for the region, allowing public agencies who implement transportation projects to do so in a coordinated manner, while qualifying for federal and state funding (SCAG 2020). SCAG's goal is that the RTP/SCS is used by land use planning jurisdictions, such as cities and counties, for prioritizing transportation projects, encouraging behavior change and furthering regional

strategies that can shape Southern California's transportation and land use development for years to come (SCAG 2020). School districts, including SMMUSD, were not engaged in development of the RTP/SCS.

The RTP/SCS includes the Project List Technical Report intended to provide the public with a comprehensive list of projects anticipated to be initiated or completed through RTP/SCS' horizon year of 2045. This list includes the Federal Transportation Improvement Program (FTIP), which forms the foundation of the RTP project investment strategy and represents the first six years of already-committed funding for projects requiring federal approval or those that are regionally significant, additional financially constrained set of transportation projects above and beyond the FTIP, and strategic projects. There are no projects from the SCAG RTP/SCS Project List Technical Report that are within or near the Proposed Project's Site (see RTP/SCS Project List Technical Report 2020 Tables 1 through 3). SRTS program is listed in the FTIP Projects List for greater Los Angeles County.

As described in the DEIR, GHG emissions associated with the Proposed Project result from the following primary sources: mobile sources (vehicle trips), energy generation for buildings, solid waste generation, and wastewater generation. Overall, through improvements and modernization to the school facilities of the Proposed Project, operational GHG emissions associated with energy use, wastewater generation, and general operation would be reduced and more energy efficient than existing buildings, including portable structures that would be removed (see page 5.6-21 of DEIR).

Mobile source GHG emissions for the Proposed Project are comprised of three main sectors: employee trips, deliveries, and student drop-off/pickup. The first two mobile emission GHG sources, employee trips and trips associated with deliveries (food, materials, etc.), would not change after completion of Project construction. As stated in Chapter 3, *Project Description*, page 3-8, and as clear assumption to the analyses throughout the EIR (see for example page 5.6-21) the Proposed Project would not change or increase the existing student capacity or staffing of McKinley Elementary School.

Students currently arrive/depart campus from a variety of methods (vehicles, walking, bicycle, or other form of alternative transportation wheels). Individual transportation preferences can vary throughout the school year and from year to year (the percentage of students utilizing each commute option is variable), and there are many factors that individual caretakers consider when selecting their preferred drop-off/pickup mode. While the Proposed Project would result in improvements to the vehicular drop-off/pickup conditions, it is speculative to assume, as the commenter infers, that these improvements would substantively change the desired method of student transport (i.e., that they would significantly encourage those who currently take alternative transit methods to revert back to driving a vehicle), such that the Proposed Project would limit the ability of the region from meeting the targeted GHG reduction goals identified in the

RTP/SCS. There is nothing about the proposed improvements to the existing campus that would limit students from utilizing their preferred mode of school commute, whether it be via vehicle or alternative method.

Further, the Proposed Project is not a transportation project, new housing development project, or mixed-use project with regional interest that would result in increased VMT that may affect the region's ability to meet targeted GHG reductions identified in the RTP/SCS. The Proposed Project's Site consists of an existing operational school since 1923. School attendance boundaries would not change and there would be no increase in students traveling to the Project Site from a greater distance beyond the current attendance boundary. Therefore, the Proposed Project would not result in an increase in VMT and corresponding GHG emissions.

As described on Page 5.6-23 of the DEIR, the RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS, but provides incentives for consistency to local governments and developers. SCAG RTP/SCS focuses on transit, transportation, and mobility and protection of the environment and health of residents. State law does not require perfect conformity between a project and the SCAG RTP/SCS.

The Proposed Project would redevelop and modernize facilities for the existing and future students of McKinley ES within an existing operational school campus and would not change underlying zoning or uses on the Proposed Project's Site. The Proposed Project would continue to serve the local student population within the surrounding communities. Since the modernization of the existing school campus would continue to be a local-serving land use, and because the Proposed Project would not result in an increase in student capacity or staff, the Proposed Project would not generate an increase in VMT such that it conflicts with the region's GHG reduction plan (the RTP/SCS). Therefore, the Proposed Project would not interfere or conflict with SCAG's ability to implement the regional strategies in Connect SoCal, and impacts remain less than significant.

Further, the NOP/IS and Notice of Availability (NOA) of DEIR were circulated to SCAG for their review. SCAG provided no comments on the DEIR. Following receipt of this comment letter on the DEIR, the District communicated with SCAG to confirm whether they had comments on the DEIR document and approach (personal communications May 8 and May 9, 2023). SCAG confirmed that they reviewed the NOA for the Proposed Project and did not have any comments regarding the McKinley ES Campus Master Plan Project or the DEIR. For the purpose of determining consistency with CEQA, it is SCAG's opinion that lead agencies, such as local jurisdictions, have the sole discretion in determining a project's consistency with the RTP/SCS. SCAG explained that it does not comment on projects that are not of regional significance, as defined by CEQA section 15206. According to SCAG, existing school campus modernization projects are not considered projects of regional significance.

2. Response to Comments

At McKinley ES, sustainable transportation is promoted through various programs and initiatives to reduce existing school-trip VMT and corresponding GHG emissions. The District has been enrolled in Metro's GoPass student TAP card program for two years, which provides all K-12 students with unlimited rides on Metro lines, the Santa Monica Big Blue Bus, and numerous other transit agencies. The District is already planned to enroll in the program for a third year to continue offering free public transportation to students through the end of June 2024. In this second year of the program, one out of every three SMMUSD students has registered and used their GoPass TAP card. Students who choose public transportation are more active in getting to and from school and engage more socially with their peers while riding. At the start of each year, in association with the Metro GoPass program, District staff provide schools with information on nearby public transportation routes and pedestrian routes. Maps are provided, which include SRTS options and important GoPass program information. This program helps create healthy habits with students, relieves local vehicular traffic congestion, and limits local air pollution from vehicular exhaust.

As stated on page 57 of the SMMUSD Transportation Sustainability Plan, the McKinley Elementary Sustainability and Beautification Committee coordinates an on-going program called Car Free Fridays to encourage students, families, and staff to commute to school using an alternative form of transportation on Fridays. This program serves to continuously educate the community about the available alternative transportation options and the importance of reducing the number of cars on the road. The District seeks to minimize the impact of the District's owned and operated fleet vehicles, such as school buses, as well as District staff and student commuting practices (SMMUSD 2019). The District's commitment to promoting sustainable transportation is highlighted in the Board Policy 5030: Student Wellness, Board Exhibit 5030: Student Wellness, and the 2019 Board-approved Districtwide Plan for Sustainability (SMMUSD 2019). These plans and features supported by the District contribute to the reduction of GHG emissions.

Therefore, the commenters assertion that the Project conflicts with the RTP/SCS is incorrect.

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

O1-3 The commenter claims that the DEIR is inconsistent with SCAG's RTP/SCS and therefore the DEIR is inadequate. The commenter states that their letter details their argument and the potential remedy. They generally refer to proposed mitigation measures that would reduce impacts resulting from this inconsistency.

This introductory comment is responded to in more detail in response to comments O1-4 through O1-11. This specific comment, in of itself, neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact.

O1-4 The commenter states that SRTS is listed as one of 20 strategies that help per-capita reduce greenhouse gas emissions in the SCAG RTP/SCS on Page 27 of the Final Connect SoCal Sustainable Communities Strategy Technical Report Adopted on September 3, 2020, and asserts that SRTS infrastructure improvements are the critical implementation measure to attain a 19 percent reduction in GHG emissions. The commenter states that the SCAG Final Connect SoCal 2020 RTP/SCS Active Transportation Technical Report includes the City of Santa Monica's Bike Action Plan, Pedestrian Action Plan, SRTS program are referenced in Tables 12, 13, and 14 of this Technical Report. The commenter states that there is a fair argument that SCAG anticipated implementation of SRTS infrastructure projects as measures in order to comply with SB 375.

While the Proposed Project does not explicitly use the "Safe Routes To School" phrase to describe the proposed enhancements, implementation of the Proposed Project includes numerous improvements to vehicular and pedestrian safety access points that meet the intent of the three SRTS strategies identified in the comment.

- Landscaped sidewalks and setbacks to improve the pedestrian realm along Chelsea Avenue and Arizona Avenue as described on Pages 5.9-13 and 5.12-12 of the DEIR.

- Pedestrian access points to the campus via the new classroom and office building located along Chelsea Avenue as described on Page 5.12-12 and -13 of the DEIR.

- Installation of additional bike racks (refer to Page 3-31 of the DEIR) to accommodate at least 10 percent of regular building occupants, with a goal to reach 20 percent capacity by 2030 as part of the Districtwide Plan for Sustainability (SMMUSD 2019).

- City's SRTS program aims to make taking active transportation to school a customary part of everyday life and includes the "Bike It Walk It" events each fall and spring, safety training for students and their parents, outreach and events, and infrastructure improvements. McKinley ES participates in the District's Bike It! Walk It! Bus It! (BIWIBI) event held twice a year in October and May. This is a Districtwide sustainable transportation competition focused on getting students to choose alternative ways to get to school besides driving. This year, 78 percent of McKinley's student body or 170 participants from McKinley ES participated in the event (SMMUSD 2023). BIWIBI creates a healthy experience for students biking, walking, scootering, etc. with their friends or parents in the temperate coastal weather. Communications on sustainable transportation benefits are sent to schools and shared with students and staff. This event helps to establish healthy habits among students.

Implementation of the Project would not limit the ability of the City or the District to host such events.

- After completion of the Proposed Project, parking for school staff would be separated from daily drop-off/pickup operations with the new lot located at the northwest corner campus at Arizona and 23rd Court. Access to this lot by vehicles would be separate from where students would enter the McKinley ES campus at the start and end of the school day either on foot or bicycle or via the drop-off/pick-up queue lane along Chelsea Avenue.

- The drop-off and pickup lane would include two lanes wide to allow for maximum flexibility in operations. (e.g., passage of buses in the left lane while drop-off and pick-up is occurring in the other (right lane) adjacent to campus walkways and closest to the school main entrance and/or vehicles in the passenger vehicle queue could depart the queue without having to wait in line behind other vehicles).

- The turnaround at the south end of the drop-off/pickup queue would be sized for buses and vehicles and would be used in conjunction with queue lane or separately (e.g., for buses only). The length of the vehicle queue lane and turnaround is approximately 400 feet.

- Additional drop-off and pickup queue length would be provided along the west side of Chelsea north around the corner and along the south side of Arizona Avenue.

- Only two vehicular entrances/exits would be provided along Chelsea. The north curb cut and entry drive would provide entry into the queue lane across from the first alley south of Chelsea Avenue (roughly where the entry drive is in the existing condition) while the south curb cut and exit drive would provide an exit onto Chelsea at about 180 feet north of the corner of Chelsea Avenue and Santa Monica Boulevard.

- Circulation in the queue lane would be one-way and counterclockwise to allow students exiting vehicles on the passenger side of the car to directly walk onto the sidewalk and into the campus entrance.

- Students who would arrive on foot or bicycle would enter from the sidewalk along Chelsea Avenue at the north and south ends of the vehicular queue lane and turnaround to avoid crossing through any vehicular traffic to get on campus.

The District is committed to providing pedestrian safety at their school sites. The District has identified maintenance projects, separate from and in addition to the Proposed Project, including installing bollards on Santa Monica Boulevard at the Cloverfield intersection. The District is also exploring bike parking locations on campus for cargo bikes.

These proposed improvements would serve to further reduce conflicts, improve safety, and enhance micro-mobility use, and are consistent with the best practices identified in the "Street Design/Engineering Strategies" section of the 2021 Safe Routes Partnership Guidelines (see Appendix 1 to this FEIR). Page 5.12-13 of the DEIR describes how the Proposed Project would not conflict with the goals of the City's Pedestrian Action Plan. The comment provides no specific issues or contrary data regarding this provided analysis in the DEIR.

The commenter asserts that the SRTS program is the critical implementation measure to attain 19 percent GHG reduction. As shown in SCAG RTP/SCS Chapter 5, Measuring our Progress Table 5.4, 2035 Greenhouse Gas Emission Reduction Calculation, multimodal options reflect approximately 3.7 percent of the total strategies and SRTS is only one of the multimodal strategies that also includes transit, pedestrian, and bicycles.[1] The McKinley ES campus is one school within one District of the multitude of districts within the SCAG region including Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The McKinley ES SRTS plan represents only a small percentage of all multimodal strategies. Therefore, contrary to the commenter's assertion, the Proposed Project would not and could not prevent achieving the regional GHG reduction goal of 19 percent. An SCS must "set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks …" (SCAG 2021). The key strategies in the RTP/SCS are focused on reducing commuter trips and improving the transportation network and land use connectivity to do that.

As stated in response to comment O1-2 above, following receipt of this comment letter on the DEIR, the District communicated with SCAG to confirm whether they had comments on the DEIR document and approach (personal communication May 8 and May 9, 2023). SCAG confirmed that they reviewed the NOA for the Proposed Project and did not have any comments regarding the McKinley ES Campus Master Plan Project or the DEIR. For the purpose of determining consistency with CEQA, it is SCAG's opinion that lead agencies, such as SMMUSD, have the sole discretion in determining a local project's consistency with the RTP/SCS (personal communication May 8 and May 9, 2023). SCAG explained that it does not comment on projects that are not of regional significance as defined by CEQA Section 15206. SCAG does not see existing school campus modernization projects as being regionally significant.

In addition to those safety enhancements that would be provided by the Proposed Project, pages 5.12-3 and 5.12-4 of the DEIR identify the specific SRTS projects that are being undertaken by the City of Santa Monica (see also comment letter A-2). During preparation of the DEIR, the District and the City met to discuss the status of these identified SRTS

[1] 0.70/19.12 = 3.7% of the strategy

projects around McKinley ES (February 16, 2023) to ensure they were accurately described. In Spring 2017, the City's SRTS program hosted walking audits with SMMUSD and school staff, parents/caregivers, and city staff to collect input to inform recommendations for street redesign and safety treatments at multiple District campuses, including McKinley ES (City of Santa Monica 2023). As a result of this collaborative process, SRTS improvements around McKinley ES have been specifically identified and are slated to be developed by 2024.

In response to this comment, Section 5.12, *Transportation*, of the DEIR has been updated to reflect the current status of the City-initiated SRTS improvement projects. These changes are shown in Section 3 of the FEIR. The proposed text change does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new potentially significant environmental impact; a substantial increase in the severity of a potentially significant environmental impact; or suggest a Project alternative or Mitigation Measure

Contrary to the commenter's assertion, given the District's proposed safety enhancements as part of the Proposed Project, the District's other ongoing initiatives, and the City's demonstrated commitment to implementing identified SRTS projects at McKinley ES, there is no basis to conclude that the SRTS projects will not be implemented, nor that the Proposed Project would impede the City's SRTS projects or would jeopardize the region's ability to meet GHG reduction goals, as defined in the RTP/SCS. Additionally, the commenters assumption that SRTS projects are a "critical implementation measure" to achieve the 19 percent reduction in GHGs is not accurate as described above. Therefore, no changes are necessary to the EIR regarding this comment.

O1-5 The commenter provides Table 3.8-10, *SB 375 Analysis* of the Certified SCAG RTP/SCS Connect SoCal EIR, which includes a footnote that the analysis includes off-model adjustments for 2035 and 2045. The commenter states that the DEIR does not provide sufficient evidence to support the conclusion that the Proposed Project would not conflict with SCAG's RTP/SCS Connect SoCal and provides an excerpt from the DEIR GHG analysis (page 5.12-11 of the DEIR). The commenter asserts that the DEIR's conclusion that the Proposed Project does not generate an increase in VMT does not apply because SCAG assumed implementation of SRTS projects as part of VMT/GHG reduction measures and suggests that the Proposed Project does not propose or does not incorporate SRTS as part of the Proposed Project's Description or mitigation measures. It is unnecessary to do so, when the City's separate SRTS projects around the McKinley ES campus have been identified and are moving forward. Therefore, the commenter asserts that the Proposed Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

As described above, the Proposed Project would renovate and modernize the existing McKinley ES campus to develop new and renovated facilities with no change to existing student capacity, enrollment, or staffing. The Proposed Project includes vehicle/pedestrian safety improvements, as described above in response to comment O-4. Separately, the City is implementing identified SRTS projects that were developed in conjunction with the community and the District. As discussed in Response to Comment O1-2, the District is actively engaged in Districtwide programs to reduce vehicle trips to its schools. Participation in the District's programs is substantial, and with the VMT decrease, GHG emissions are also decreased. Districtwide, SMMUSD had 2,662 GoPass TAP card participants and 83,539 boardings in Year 1 and had 2,753 participants and 72,525 boardings in the first half of Year 2 (through January 31, 2023). McKinley ES had 152 registrations and 2,644 boardings in Year 1 and 59 new registrations and 2,182 boardings up to present in Year 2. The Bike It! Walk It! Bus it! event takes place twice per year. In October 2022, there were 3,315 participants Districtwide, with 356 from McKinley ES. In the May 2023 event, there were 2,607 participants Districtwide, with 170 from McKinley Elementary School.

The commenter fails to take into consideration the VMT/GHG reductions that are being achieved by the District's programs and will be achieved by the City' SRTS projects. Indeed, CEQA mandates that existing and future conditions must be accounted for in the consistency analysis. "When a proposed project is compared with an adopted plan, the analysis shall examine both the existing physical conditions at the time the notice of preparation is published … as well as the potential future conditions discussed in the plan." (CEQA Guidelines, § 15125(e).) As discussed above, the District has done this in the DEIR and amplified in these responses. Therefore, there is no articulated factual basis presented by the commenter to lead to the conclusion that the Proposed Project plus existing conditions would conflict with the RTP/SCS or limit the ability of the region to achieve the identified GHG reduction targets. No changes to the EIR are necessary.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

O1-6 The commenter essentially states the DEIR incorrectly relies on a baseline threshold (no change in existing VMT/GHG) where it should have relied on a threshold of 19 percent below baseline for a reduction in GHG emissions. They claim without justification that after CEQA is "triggered" that the threshold for significance is plan consistency.

As lead agency, the District has the ability to establish, with justification, applicable thresholds to employ to projects, and may rely on thresholds previously adopted by other agencies (CEQA Guidelines § 15064.7(c, d)). Regarding GHG emissions, the DEIR appropriately describes and evaluates GHG emissions based on the South Coast Air Quality Management District (AQMD) Working Group's bright line threshold (3,000

metric tons of carbon dioxide equivalent). The per-capita reduction thresholds identified in the SCAG RTP/SCS are specific to passenger vehicle commute trips only and do not consider all vehicle trips and vehicle types in the SCAG region.

Regarding VMT, as described in Section 5.12, *Transportation*, page 5.12-9 and 5.12-14 of the DEIR, in lieu of having their own VMT thresholds, the District appropriately defers to the City of Santa Monica's VMT screening criteria system to determine if a VMT analysis would be required. Under Tier 1 of the City's VMT screening criteria, projects that result in development of specific land uses are screened out from further analysis, including new construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase, or if student enrollment is increased, 75 percent of the student body comes from within 2 miles of the school (City of Santa Monica 2020).

The Proposed Project falls under Tier 1 of the City's screening criteria and is, therefore, appropriately screened out from further VMT analysis. VMT analysis and comparison of the Proposed Project against the significance thresholds are not required (see also Appendix K of the DEIR). The Proposed Project would not increase the student or employment population at McKinley ES, and the attendance boundaries of the school would not change; the Proposed Project would not result in increased vehicle trips to and from the school during operation of the Proposed Project when compared to existing conditions. The Proposed Project would not modify primary site access locations and traffic patterns that could potentially result in an increase in the average trip lengths. Additionally, there is no requirement or precedent for individual projects in the SCAG region to reduce VMT for projects that do not generate new VMT and trips.

Therefore, the lead agency's application of thresholds of significance is supported by substantial evidence and appropriate for this Proposed Project.

The DEIR does not rely on the RTP/SCS' Program EIR for its analysis or conclusions with respect to VMT or GHG emissions. See both Sections 5.6, *Greenhouse Gas Emissions* and 5.12, *Transportation*, of the DEIR. Neither section relies on the RTP/SCS' Program EIR in their analyses. Instead, the DEIR's analyses in these sections stand on their own without taking credit or tiering from the RTP/SCS' Program EIR.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

O1-7 The commenter states that establishing consistency with applicable plans, particularly the RTP/SCS, is essential to validly tiering from that previous plan's analysis. The commenter asserts that for this reason, the CEQA Guidelines Appendix G threshold is "Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?"

The commenter incorrectly assumes that the Project is "tiering" off the RTP/SCS. As mentioned in response to comment O1-2, the District was not involved in preparation of the RTP/SCS EIR. The District is not identified as a lead or responsible agency under the RTP/SCS EIR. The SCAG RTP/SCS focuses on transit, transportation, and mobility, and protection of the environment and health of residents. The Project as proposed by the District is not in any way a component of the RTP/SCS EIR and it is not considered a separate but related project. There is nothing to suggest from the SCAG RTP/SCS EIR that the Proposed Project was considered as a future project pursuant to the SCAG RTP/SCS EIR. The impacts and mitigation measures identified for the Proposed Project are specific to the District, as lead agency, and the Project. The RTP/SCS is appropriately included as a reference document with respect to regional goals and land development trends – not Project-specific issues. In the District's review, there has not been a school project that has ever tiered off the RTP/SCS EIR. Additionally, in correspondence with SCAG during preparation of this Final EIR, SCAG conveyed no comments regarding this scenario.

Therefore, comments suggesting the Project should tier off the SCAG Program EIR are unfounded. The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

O1-8 The commenter provides excerpts from CEQA Guidelines Section 15183.5, which sets the requirements for tiering/streamlining the analysis of GHG emissions from qualified climate action plans.

The commenter misinterprets CEQA Guidelines section 15183.5. It is specific to projects that are consistent with a jurisdiction's qualified climate action plan, of which the RTP/SCS EIR is not. The RTP/SCS does not provide an inventory and forecast of GHG emissions applicable to the District, nor does it quantify individual GHG reduction measures. It is not a "GHG reduction Plan" in this regard. It is a broad transportation/land use document that considers regional strategies to reduce VMT/GHG. However, it is not a qualified GHG reducing plan from which CEQA Guidelines section 15183.5 can be utilized. Additionally, there is nothing in the SCAG RTP/SCS that indicates that including SRTS elements would unequivocally ensure GHG reduction targets are met (see Response to Comment O1-4). There is no applicability of CEQA Guidelines section 15183.5 to the Proposed Project concerning consistency or conflict with the RTP/SCS. Further, as discussed above in Response to Comment O1-6, the Proposed Project's Draft EIR analysis does not rely on the RTP/SCS Programmatic EIR and is not a follow-on transportation or land use planning project that the RTP/SCS is targeted for.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

O1-9 Santa Monica Families for Safe Streets asserts that the McKinley Master Plan DEIR, without the Safe Routes to School measures, is inconsistent with the RTP/SCS and is therefore ineligible for tiering under 14 CCR § 15183.5 (a)(1)(D). The commenter cites Public Resources Code § 21094 to demonstrate SMMUSD's legal requirement to establish consistency with the SCAG 2020 RTP/SCS's PEIR.

As provided in Responses to Comment O1-6, O1-7, and O1-8 above, the Proposed Project's EIR makes no claim to tier off RTP/SCS EIR, nor is there anything close to a sufficient analysis of project-level impacts, for GHG or any other topic, in the RTP/SCS EIR.

As described in Chapter 2, *Introduction*, of the DEIR, the SMMUSD is the public agency that will carry out this Proposed Project. For this reason, the SMMUSD is the CEQA lead agency for the Proposed Project. The SMMUSD determined that a standalone, project-level EIR is required to determine whether there is substantial evidence that construction and operation of the Proposed Project would result in environmental impacts and impose feasible mitigation for any discovered potentially significant environmental impacts or cumulatively considerable impacts. This DEIR is a project-level EIR and is not a tiered document. The Proposed Project is not a "later project," as used in Public Resources Code § 20194. The RTP/SCS does not plan for construction and renovation projects at existing school sites, and the RTP/SCS Program EIR did not analyze construction and renovations at existing school sites. Thus, the DEIR is not a tiering EIR for a later project. Therefore, the EIR prepared for the Proposed Project is the appropriate level of CEQA review.

The comment is acknowledged. The SMMUSD Board of Education will consider all comments prior to deciding on the Proposed Project. The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

O1-10 The commenter argues the need to add a new mitigation measure requiring the District to work with community stakeholders to update the 2019 McKinley Elementary SRTS plan and implement this plan by December 31, 2025. The commenter asserts that the District must contribute financially to the SRTS plan development and implementation if the City of Santa Monica determines that funding for the "Six Schools" Safe Routes is inadequate to implement the identified Safe Routes to School improvements at McKinley ES.

As described above in response to comment O1-2, the City (as the lead agency for these offsite improvements) has already initiated implementation of identified SRTS projects. The District has been, and continues to be, engaged in this process through completion. The DEIR has been revised to clearly indicate this process (see Section 3 of this FEIR). The proposed revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an already identified significant environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

The Proposed Project would not preclude implementation of the City's SRTS. SRTS improvements around McKinley ES have been identified and the design work is underway. The City met with the District on February 16, 2023 to discuss the improvements and the timing for implementation. As indicated in comment letter A2 provided by the City, the City anticipates construction to occur in 2024. These improvements are already identified by the City as lead agency on the separate Six Schools STRS project, and is in progress. And as described throughout these responses to comments, there is no significant environmental effect that results. Furthermore, the commenter has not provided evidence that including an already developing project with the Proposed Project would make it consistent with the RTP/SCS VMT and GHG reduction targets.

Therefore, the suggested mitigation measures are not required.

O1-11 The commenter asserts that a nexus and proportionality exist for the District to pay impact fees to cause implementation of the mitigation measures. The comment suggests that the Proposed Project has incorporated on-site project design features to operate automobile drop-off and pickup more efficiently, resulting in less dwell time for driving parents and possibly inducing additional automobile trips. This establishes a nexus for the school's trip attraction activity and the active transportation safety impact condition that SRTS infrastructure is intended to mitigate.

As stated throughout this response, as supported in the DEIR and the above responses, and as confirmed through the City's comment letter on the DEIR (the authority on transportation impact evaluation and review; see comment letter A2) which provides no comments on assumptions provided, the Proposed Project would result in no change to existing enrollment, student capacity, or staffing. As stated in response to comment O1-2, individual transportation preferences can vary throughout the school year and from year to year (the percentage of students utilizing each commute option is variable), and there are many factors that individual caretakers consider when selecting their preferred drop off/pick up mode. While the Proposed Project would result in improvements to the vehicular drop off/pick up conditions, it is speculative to assume, as the commenter infers,

that these improvements would substantively change the desired method of student transport (i.e., that they would significantly encourage those who currently take alternative transit methods to revert back to driving a vehicle), such that that Project would result in significant transportation/VMT impacts. There is nothing about the proposed improvements to the existing campus that would cause students to commute to and from school by car.

The commenter compares a coffee drive-thru project next to a school, to emphasize a need to evaluate and mitigate traffic impacts, but that is not comparable. This is a modernization of an existing school with no changes in operation. Additionally, this comment appears to focus on "trips" and "congestion" which is not considered a significant impact under CEQA pursuant to SB 375. The City has reviewed the Proposed Project and has not indicated that transportation impact fees are necessary or appropriate. The City has confirmed in their correspondence (comment letter A2) that the Six Schools SRTS projects are in progress and will be executed. Overall, the proposed condition for the drop-off/pickup area is a safety and traffic congestion improvement from existing conditions.

Therefore, there is no nexus to require traffic funding mitigation under CEQA. The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact.

O1-12 The commenter references Measure SMS whereby the District anticipated, and voters approved, the need for Traffic Control Devices as part of the school modernization construction program. They state that quick-build mitigations are an authorized expenditure for the source of funds the SRTS project. The commenter mentions specific improvements such as flexible delineators and posts, speed feedback signs, crosswalk markers, and crosswalk barricades.

As mentioned throughout this response, the District has included a number of site improvements on District-owned property as part of the Proposed Project, and, through its continual attention to safety and access, is considering other additional improvements outside the scope of this Proposed Project. The City, in coordination with the District as well as staff and caretakers, has identified additional priority SRTS projects in offsite locations under the jurisdiction of the City, as the planning lead agency. These improvements are in progress. Even though the District may allocate Measure SMS funds to traffic control devices, no further such devices are needed here given the improvements to drop-off and pick up, bus, and parking, made as part of the Proposed Project and the City's Six School SRTS project that includes McKinley ES. There is no remaining VMT, GHG, or safety significant impact to remedy.

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

O1-13 The commenter identifies a textual error in Appendix K to the DEIR. In response to this comment, Appendix K, McKinley ES VMT and Trip Generation Memo, of the DEIR has been updated to correct the text error. The changes are shown in Section 3 of the FEIR. The proposed text change does not require recirculation of the EIR because it was simply a typographic error and the analysis is clearly for the McKinley ES Proposed Project, not Grant's. This change does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation Measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Proposed Project, but the Project proponents decline to adopt it.

O1-14 The commenter references Board meeting dates in October and November 2021 where contracts to prepare EIRs for the McKinley and Grant modernization projects were approved. They suggest that a Class 14 Categorical Exemption should have been prepared for the Proposed Project in lieu of EIRs.

Both of these referenced contracts resulted from a competitive process in response to Request for Proposals (RFPs) issued by the District. Section 21084 of the Public Resources Code requires the CEQA Guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA. Class 14 is the exemption related to Minor Additions to Schools. Section 15300.2 lists the five "exceptions" that must be addressed for use of a Class 14. These include ensuring no cumulative impacts, no impact to scenic resources, no impacts to locations within a State Scenic Highway, no reasonable possibility of significant environmental effects due to unusual circumstance, no possibility of an identified hazardous waste site, and no impact to historical resources. In order to meet these exceptions, the District conducted necessary due diligence and prepared an Initial Study to determine whether any of these areas require more comprehensive analysis (via an EIR). Through the Initial Study, it was concluded that, due to the presence of a historic district, there was the potential for the Project to cause a substantial adverse change in the significance of a historical resource. Therefore, the District, as lead agency with authority to do so, determined an EIR was the appropriate level of CEQA review. Therefore, the District is not required to utilize the Class 14 Categorical Exemption for the Proposed Project, and it is allowable for the District to utilize an Environmental Impact Report. It is also worth noting that, throughout the commenter's letter, they assert that additional mitigation measures are required, mitigation measures are not allowed on Categorical Exemption.

The District has confirmed that an EIR is the appropriate level of CEQA review required, and has conducted this environmental review accordingly. The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact.

2. Response to Comments

O-15 The commenter suggests that the EIR was pro forma and did not substantively address environmental issues outside of the Historical Resources category, where the District had seen prior controversy and prospects of litigation. They assert that because this is not a "Focused EIR," it therefore requires review of all potentially significant impacts, including the plan inconsistency detailed above.

The Proposed Project's EIR was prepared in accordance with CEQA Guidelines. As described in Chapter 6, Other CEQA Considerations, Section 6.2, Impacts Found Not To Be Significant, Page 6-1, California Public Resources Code (PRC) section 21003 (f) states: "…it is the policy of the state that…[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the CEQA Guidelines § 15126.2(a), which states, "An EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and § 15143, which states, "The EIR shall focus on the significant effects on the environment." The CEQA Guidelines allow use of an Initial Study to document project effects that are less than significant (CEQA Guidelines, § 15063[a]). Further, CEQA Guidelines § 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in this DEIR.

The DEIR is a project-level EIR and is not a focused EIR. The DEIR analyzes all CEQA Guidelines Appendix G thresholds in Chapters 5 and 6. The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact.

Verbal comment provided by John Agoglia received during the April 18 Community Information Meeting

R1. Response to Comments from John Agoglia

R1-1 The commenter asked how often air quality testing would occur during construction of the Proposed Project.

As stated in Section 5.1, *Air Quality*, of the DEIR, construction-related emissions would be less than the respective South Coast AQMD regional significance threshold values. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Thus, short-term air quality impacts from Proposed Project-related construction activities are considered less than significant. Therefore, no additional air quality testing would be required during construction of the Proposed Project. Though no air quality testing is required, the Project is required to enforce Rules 401, 402, and 403 that require implementation of best management practices to ensure reduced air pollution and fugitive dust.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R1-2 The commenter asked if the mitigation measures provided in the DEIR are standard for all phases of the Proposed Project.

Mitigation measures identified in the DEIR would reduce any potentially significant environmental impacts of the Proposed Project to less-than-significant levels and would be required for all three phases of the Proposed Project. Many of the mitigation measures are "standard" type mitigation measures that are employed by lead agencies.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R1-3 The commenter asked where the school marquee would be located and recommended that the District should consider installing the marquee in an area where it does not face the neighbors.

The location of the new marquee would be addressed during the final design of the Proposed Project; however, the District would comply with the SMMC Chapter 9.61, *Signs*, which preserves and enhances the aesthetic and environmental values of the City while providing for channels of communication to the public, including identification and announcements at McKinley ES.

2. Response to Comments

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

Verbal comment provided by Juan Matute received during the April 18 Community Information Meeting

R2. Response to Comments from Juan Matute. Please also see responses to Comment Letter O1, provided by the same commenter.

R2-1 The commenter stated that there is a typo in Appendix K – VMT and Trip Generation Memo. Please see response to comment O1-14 above.

R2-2 The commenter recommends a new mitigation measure be added to the EIR, for the District to work with the City of Santa Monica to implement the Safe Routes to Schools program (including funding). Please see responses to comments O1-5, O1-8, and O1-12 above.

R2-3 The commenter states that the Proposed Project needs to incorporate SRTS program or analyze cumulative impacts of not implementing program. Please see response to comments O1-4 through O1-6 above.

R2-4 Commenter states that the Land Use and Planning section analysis in the DEIR is incorrect because the Proposed Project is inconsistent with RTP/SCS. Specifically, because the Proposed Project does not comply with or support the SRTS program. Please see responses to comments O1-2, O1-4, and O1-11 above.

R2-5 The commenter states that the proposed project DEIR is tiering off of the RTP/SCS Program EIR. Please see responses to comments O1-9 and O1-10 above.

R2-6 The commenter states that the Proposed Project DEIR is avoiding a project-level GHG analysis. Please see response to comment O1 above.

2. Response to Comments

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Verbal comment provided by Neal Gardner received during the April 18 Community Information Meeting

R3. Response to Comments from Neal Gardner.

R3-1 The commenter asked if the Proposed Project would result in any displacement of students during construction activities.

Implementation of the Proposed Project would not result in any displacement of students and would not require any off-site housing locations during construction of the Proposed Project. As described on page 5.11-8 of the DEIR, during the construction of Phase 2, which could be up to 18 months, access to the campus playground would be temporarily restricted; thus, recreational uses of the playground would be limited to hardtop playground areas located directly west of Building D and the location of the former portable classroom buildings. Physical education programming would be moved to the multi-purposed room (MPR) or other outside areas that are not under construction. Additionally, construction of Phase 2, would require temporary relocation of the ongoing community recreational uses on the campus. Other District facilities would be available for use during construction of the Proposed Project for community recreational activities and programs, including Franklin Elementary School, located approximately 0.7 miles from the campus; Lincoln Middle School, located approximately 0.75 miles from the campus; and Grant Elementary School, located approximately 1.2 miles from the campus.

The comment neither identifies a deficiency in the EIR's analysis nor a new or exacerbated potential significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

2. Response to Comments

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Verbal comment provided by Ron Groezinger received during the April 18 Community Information Meeting

R4. Response to Comments from Ron Groezinger

R4-1 The commenter stated that they live along 23rd Court and are concerned about air quality and pedestrian safety with the implementation of the new parking lot at the corner of 23rd Court/Arizona Avenue. The commenter also stated that additional cars near homes along 23rd Court would cause additional traffic, noise, and air quality impacts.

The DEIR considers the effects of potential environmental impacts on sensitive receptors including students, staff, and residents within and near the McKinley ES campus. As stated in Section 5.1, *Air Quality*; 5.10, *Noise*; and 5.12, *Transportation*, potential impacts regarding air quality, noise, pedestrian safety, and traffic would be considered less than significant during construction and operation of the Proposed Project. Best management construction practices would be implemented throughout construction. As stated on page 5.12-14 of the DEIR, the Proposed Project would not increase the student or employment population at McKinley ES, and the attendance boundaries of the school would not change; the Proposed Project would not result in more vehicle trips to and from the school during operation of the Proposed Project when compared to existing conditions. The new parking lot configuration after Phase 3 would result in drop-off/pick-up queuing within the new lane along Chelsea Avenue. The new parking lot along the western portion of the campus adjacent to 23rd Court would be for staff parking. Additionally, implementation of Mitigation Measures N-1, N-2, and T-1 would reduce potentially significant impacts related to noise/vibration and traffic to less-than-significant levels.

The comment neither identifies a deficiency in the EIR's analysis nor a new or exacerbated potential significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R4-3 The commenter asked where parking for construction workers would be provided during construction of the Proposed Project. As stated on page 5.12-17 of the DEIR, all construction staging would be located within the boundaries of the existing campus. Additionally, implementation of mitigation measure T-1 would require a Construction Management Plan for each phase of the Proposed Project which would ensure approved worker parking locations for each phase of construction and would include the following:

- Utilize portable message signs and information signs at construction sites as needed;
- Coordinate with the responsible agency departments, including the City of Santa Monica Public Works and Planning Departments, and the City of Santa Monica Fire Department no less than 10 days prior to the start of the work for each phase including specifying whether any temporary vehicle, pedestrian, or bicycle

construction detours are needed, if construction work would encroach into the public right-of-way, or if temporary use of public streets surrounding the campus is needed; and

- Review all existing emergency access and evacuation plans and identify procedures for construction area evacuation in the case of an emergency declared by local authorities.

- Additionally, the District shall ensure that the construction contractor follows all applicable requirements and regulations established in the City of Santa Monica Procedures and Requirements for Temporary Traffic Control Plans to ensure the TTCP is prepared to City standards and approved as necessary.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R4-4 The commenter stated that they do not believe that the implementation of the Proposed Project takes into account impacts to the residents along 23rd Court.

The DEIR considers the effects of potential environmental impacts on sensitive receptors including students, staff, and residents within and near the McKinley ES campus. Refer to response to comment R4-1.

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

R4-5 The commenter asks what will happen to the trees that are currently within the community garden.

As stated on page 3-31 of the DEIR, all existing mature trees in the historic main courtyard and at the student learning garden would be maintained.

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

Letter R5 – Mari Ostendorf (5 pages)

From: "Upton, Carey" <cupton@smmusd.org>
Date: May 2, 2023 at 5:11:05 PM PDT
To: "Capata, Julian" <jcapata@smmusd.org>
Cc: "Massetti, Steve" <smassetti@smmusd.org>
Subject: FW: McKinley Elementary School Campus Master Plan Project

McKinley Draft EIR comment

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
310-450-8338 x79383 w
424-581-5426 m
cupton@smmusd.org

A school building is more than a physical structure providing housing, light, heat, and shelter from the elements; it is the one expression of the community's commitment to education.

Donald Leu – 1965

From: Mari Ostendorf [mailto:mariostendorf@icloud.com]
Sent: Tuesday, May 2, 2023 2:12 PM
To: Upton, Carey <cupton@smmusd.org>
Cc: Mari Ostendorf <mariostendorf@icloud.com>; Mari <jimandmari@me.com>
Subject: McKinley Elementary School Campus Master Plan Project

2. Response to Comments

CAUTION! This EXTERNAL email from mariostendorf@icloud.com originated from outside SMMUSD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Upton,

Thank you for taking the time to read this email, pertaining to the **McKinley Elementary School Campus Master Plan Project**.

I have read the March 2023 Draft Environmental Impact Report State Clearinghouse No. 2023010230 via the link on the SMMUSD website. I have also read the two (2) page summary document received via USPS to "Agencies, Organizations, and Interested Parties" advising of availability of the report.

As a 20 year Santa Monica resident, Homeowner in the Mid-City Neighborhood, former McKinley parent of two (2) children who collectively attended McKinley Elementary School for 13 years we have a strong love this historical school in our community.

Our love extends greatly to the mature 7,500 square foot McKinley Student Learning Garden, an outdoor learning green space lovingly maintained and cared for by the larger McKinley community. I am shocked that this beautiful outdoor space will be removed to become a parking lot.

R5-1

I feel the McKinley Elementary School Campus Master Plan Project overlooks to a great degree the Outdoor Student Learning Garden and the value it provides to the student community, our young learners who value the opportunity to extend their learning outside of the classroom in a natural setting, in the midst of mature trees, fruit trees, flora and fauna.

This email is to STRONGLY ENCOURAGE you to NOT DESTROY the award-winning McKinley Student Learning Garden. Please do NOT remove 7,500 square feet of green space loved by the pedestrians in the community city as we walk past observing how the CHERRY TREE is in bloom, how the FRUIT TREES are bearing fruit, how the MILK WEED is attracting the MONARCH BUTTERFLIES, and how the LEMON VERBENA fills the air.

R5-2

I know first hand during my 13 years at McKinley how the Sustainability and Beautification Committee (SBC) of McKinley lovingly and eagerly dedicated thousands of hours with children by their sides, donated tools and materials to provide a flourishing outdoor learning space for our future leaders, and provided all children of the school with an accessible, hands-on learning environment.

R5-3

Below I outline areas of concern and questions.

I thank you in advance for reading my email thoroughly. I have raised questions in the past at school events, to be told that it was "*only a draft*" and other options would be considered, yet I see this is not the case. I spent hours reading the Report you have provided, and I hope to receive responses to my queries and concerns.

R5-4

1. **1.4 Project Summary** (3rd paragraph/last sentence) "…and relocation of the parking lot…". There is NO reference to the destruction of the Student Learning Garden in the summary of the project. This is 7,500 square feet of existing outdoor learning green space with mature trees, fruit trees, raised beds, tool shed, composting area, curved wooden reading nook, lending library with books focusing on nature/animals/flowers, and weather resident green chairs and bench which were purchased by the school with funds donated to the SBC line item. The Garden is loved by the school community as well as the neighborhood. WHY IS THERE NO REFERENCE TO THE DEMOLITION OF THE GARDEN IN THE PROJECT SUMMARY. R5-5
2. **Table 1-1 / 5.5 Geology and Soils; Impact 5.5-1** Please confirm that the QUALIFIED PALEONTOLOGIST will be on-site/providing oversight throughout any excavation near the Student Learning Garden at the corner of Arizona and 23rd Court alley area. R5-6
3. **3.3 Project Objectives. #4** references "…promote whole child development." as a project objective. With the "whole child" in mind, I believe we need to provide children with learning opportunities in outdoor green spaces. I was involved in several learning opportunities in the Student Learning Garden - learning about and releasing Lady Bugs to the raised planters, reading a book on the curved wooden benches that accommodated an entire class about "being present" and mindfulness with a lesson on breathing and listening to our surroundings (birds, wind blowing leaves, etc.), and a student-favorite which was learning about cherry trees while we make our own cherry blossoms, wrote kind messages on our personal cherry branch for others to read. Removal of the Student Learning Garden would diminish these opportunities, something that cannot be replaced with small pop-up gardens dotted throughout the new campus. It is just not the same. R5-7
4. **3.4 Existing Conditions**. "…a student garden." That is the extent to which the Master Plan identifies the 7,500 amazing garden. This is embarrassing. R5-8
5. **3.5.1 Proposed Project Development Table 3.2**. Again, this summary does not reference the Student Learning Garden adequately. This should read: "This 7,500 square foot of outdoor, green learning space is home to several mature trees, fruit-bearing trees, a nearly 7 year old Cherry Tree which blossoms in full pink every year, a full cycle composting arena, above ground/raised garden plots, a reading nook, benches and chairs, a lending library, picnic tables under a hanging vine trelles for lessons and activities, shade and sun, tool shed, etc." To a bystander it may appear as a simple "student garden" but that is not the case, and this award-winning garden should not be destroyed in Phase 3 to make way for asphalt parking lot. R5-9
6. **Figure 3-7c Phase 3 (4)** references only "new parking lot along Arizona Avenue and 23rd Court." There is ZERO REFERENCE to the destruction of the decades old, mature, award-winning McKinley Student Learning Garden. There are NO PHOTOS in the entire plan of the existing Garden. R5-10

2. Response to Comments

None. Zero. There are no Before/After Photos/Renditions of the actual garden space to illustrate what you will be destroying. Please INCLUDE current/relevant photos that show the Student Learning Garden. R5-10 Cont'd

7. **Page 3-28. 3. Project Description / Phase 3. Paragraph 3** references "… new parking lot with 78 stalls…Arizona Avenue and 23rd Court in place of the learning garden." I ask:

    1. Where is the Plan describing what will become of each tree that will may be removed?
    2. Will any foliage/flora/tree be donated?
    3. Which organizations have been contacted to safely remove the trees?
    4. Where will they be relocated on the campus?
    5. Will they be donated to the McKinley community of parents who purchased, planted, watered, etc. the flowers, plants, shrubs, etc. in the garden?
    6. What will become of the Fruit Bearing Trees?
    7. What will become of the Milk Weed plants that attract Monarch Butterflies?
    8. What will become of the mature Lemon Verbena Plants?
    9. What will become of the maturing Cherry Tree?
    10. Where will the Compost Arena be relocated?
    11. Where will the green chair/bench be relocated that was purchased by the SBC?

    R5-11

8. **3.5.6 Landscaping Improvements** (last sentence) "All existing mature trees…at the North West corner of campus would be maintained." Please confirm in detail:

    1. Which trees are identified as "mature"
    2. What will happen to all other NON-MATURE trees?
    3. How is "maintained" defined?
    4. See #7 above for additional questions.

    R5-12

9. **3.6.1 Construction Phase Phase 3**. This is the ONLY PLACE mentioning the "…removal of the existing learning garden." With NO DETAILS provided, nor discussion of any other alternatives considered to KEEP THE GARDEN in place. What are the details around this "removal?" R5-13
10. **4. Environmental Setting. Tables 4-3 Existing Facilities and 4-4 Existing Recreational Facilities.** Neither of these Tables references the Student Learning Garden. I advocate to please INCLUDE THE 7,500 square foot Student Learning Garden that is missing from the tables as there will be impact to the flora and fauna - butterflies, birds, insects, etc. The omission of this is deceptive to the Agencies, Organizations, and Interested Parties that you have asked to provide input and feedback. Omission of the Student Learning Garden being REMOVED IN FULL, is misleading to everyone. R5-14
11. **4.3.4 Campus History.** The History of the McKinley Student Learning Garden is omitted. This space has a long history at McKinley and should be noted. R5-15
12. **5.9 Land Use and Planning (page 5.9-1) 3rd Paragraph** makes reference to WRITTEN COMMENTS. "The IS/NOP…impact to community R5-16

character…included in Appendices B and C of the document." I was not able to find **Appendices B and C**. Can you please advise where they are included? R5-16 Cont'd

13. **Table 5.11-1** References there is ZERO (0) Outdoor Classroom Square Footage. I would DISAGREE. There is 7,500 square feet of existing outdoor classroom space that is accessible and available to all student classrooms in the STUDENT **LEARNING** GARDEN. The Master Plan refers to the garden as both a Student Garden and a Learning Garden, underscoring that there is existing outdoor learning space that SHOULD NOT be destroyed. R5-17
14. **7. Alternatives to the Proposed Plan. 7.5 Alternatives Selected for Further Analysis.** None of the three (3) alternatives reference anything about the 7,500 square foot McKinley Student Learning Garden outdoor space with will be demolished. Am I correct in reading this? The entire planning committee, SMMUSD committee members, outside organizations involved, etc. NEVER CONSIDERED an alternative location for the new parking lot other than REMOVING THE MATURE GARDEN?? In the era of supporting green space, and encouraging out students to be mindful, present, learn about and be involved with nature - your only option is to remove the Garden? I encourage that Alternatives be thoroughly discussed/considered to place the new parking lot in a location that does not result in the destroying of the McKinley Student Learning Garden. R5-18

In sum, the McKinley Student Learning Garden is an award-winning outdoor, accessible learning space that welcomes all students. This 7,500 square foot garden, with mature and growing, fruit bearing and flower producing trees, hundreds of plants and shrubs, butterflies, birds, insects, and even a wee fairy garden, is a beautiful part of our neighborhood community and the school campus. R5-19

Please keep the McKinley Student Learning Garden and REMOVE IT'S DESTRUCTION from the McKinley Elementary School Campus Master Plan Project.

Thank you very much.

I look forward to hearing from you.

Regards,
Mari Ostendorf

Cell/text: 310.451.9629
Email: mariostendorf@icloud.com

2. Response to Comments

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R5. Response to Comments from Mari Ostendorf, dated May 2, 2023

R5-1 This comment contains introductory information about the commenter and their interest in the Proposed Project, particularly regarding the removal of the student learning garden and implementation of the parking lot along Arizona Avenue and 23rd Court during Phase 3.

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

R5-2 This comment asserts that the Proposed Project overlooks the value of the existing student learning garden and states that the District should not destroy the learning garden as part of the Proposed Project.

As stated on Page 3-27 of the DEIR, implementation of the Proposed Project would include the relocation of the existing learning garden during Phase 2. The McKinley School Learning Garden would be relocated to a more central location on campus while remaining available to the community outside of school hours (evenings and weekends). The intent is to make the garden more accessible to and safer for elementary school age students during the school day. Its new location adjacent to the existing multi-purpose room (cafeteria and kitchen) and new lunch shelter would afford learning opportunities in which students are able to relate the planting, farming and harvesting of plant life to the preparation and consumption of naturally grown, high quality and nutritional foods. The new location of the learning garden would be adjacent to the new STEM classroom in the main building and would support outdoor learning activities associated with STEM in the areas of botany and biology. All trees currently located within the area of the existing community garden would be preserved and remain in place. The new parking lot would be designed to accommodate all of these trees and maintain their health.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-3 This comment provides a description of the Sustainability Beautification Committee (SBC) at McKinley ES.

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

R5-4 This comment contains introductory information regarding the commenter's subsequent concerns and questions regarding the Proposed Project.

This comment is not a direct comment on the content or adequacy of the DEIR and does not raise a specific environmental issue; therefore, no further response is required.

2. Response to Comments

R5-5 This comment states that Chapter 1, *Executive Summary*, of the DEIR, does not reference the removal of the student learning garden located near the intersection of 23rd Court and Arizona Avenue.

The executive summary provides an overview of the entire Proposed Project. As described in Chapter 3, *Project Description*, pages 3-27 and 3-28 of the DEIR, implementation of the Proposed Project would include removal of the existing learning garden during Phase 3 and would include the relocation of the existing learning garden from its current location to the area adjacent to the cafeteria (Building A) during Phase 2. Additional information regarding the new student learning garden is provided in Comment Response R5-2.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-6 The comment states that the District should confirm that a qualified paleontologist will be present during excavation of the existing student learning garden near the intersection of 23rd Court and Arizona Avenue.

As described on Page 5.5-10 of the DEIR, mitigation measure GEO-1 would require SMMUSD to retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP 2010) (Qualified Paleontologist) prior to the commencement of any on-site excavation or grading activities. A Paleontological Resources Management Plan (PRMP) shall be prepared by the Qualified Paleontologist that incorporates all available geologic data for the Project in order to determine the necessary level of effort for monitoring based on the planned rate of excavation and grading activities, the materials being excavated, and the depth of excavation.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-7 This comment asserts that Project Objective #4, Provide enhanced, modern support spaces—such as libraries, cafeteria, labs, maker spaces, and other student services—that promote "whole child" development, is not met with the removal of the student learning garden from its current location because the Proposed Project would diminish learning opportunities for students in outdoor green spaces. The learning garden would not be removed. It would be relocated to be within the core of the campus between Buildings A, B, and C. As stated on page 5.11-13 of the DEIR, at completion of the Proposed Project, outdoor classroom space would increase by approximately 8,104 square feet.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-8 This commenter expresses displeasure with the name used in the DEIR to identify the student learning garden in Section 3.4, *Existing Conditions*.

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

R5-9 This comment states that Section 3.5.1, *Proposed Project Development*, does not adequately reference the existing student learning garden. The commenter also states that the student learning garden should not be destroyed and replaced with a new parking lot near the intersection of 23rd Court and Arizona Avenue.

As described in Chapter 3, *Project Description*, of the DEIR, the existing learning garden would be relocated from its current location to the area adjacent to the cafeteria (Building A) closer to the core of the campus. Additional information regarding the new student learning garden is provided in Comment Response R5-2.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-10 This comment states that Figure 3-7c, *Proposed Project's Site Plan: Phase 3*, does not reference the location of the existing student learning garden.

In response to this comment, Figure 3-7c, *Proposed Project's Site Plan: Phase 3*, has been revised to identify the location of the existing student learning garden and location of the new student learning garden, adjacent to the cafeteria (Building A). The proposed figure revision does not require recirculation of the EIR because it does not provide significant new information that would give rise to a new significant environmental impact; a substantial increase in the severity of an environmental impact; or suggest a Project alternative or Mitigation.

R5-11 This commenter requests to know about the removal/relocation of existing trees and plants within the student learning garden and if the green chair/bench would be relocated.

There are five mature pepper trees in the area currently occupied by the existing student learning garden that would be occupied by a new parking lot at completion of the Proposed Project. Three of the trees are at the north end of the student learning garden at the corner of Arizona Ave and 23rd Court and two are at the south end of the student learning garden just north of the portable classrooms. The five mature trees have canopies that are a minimum of 30 feet in diameter. All five trees would remain in place and would be maintained. All other plant materials are shrubs and low-lying plants that would be

removed when the parking lot is installed and relocated to the new learning garden. The District would consider relocation of the green chair/bench during final design of the proposed project.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-12 This comment contains questions regarding the relocation of existing trees within the student learning garden, including definition of mature and non-mature trees and definition of maintained. Please see response to comment R5-11 in regard to the existing trees within the current student learning garden.

"Mature" trees include the five existing pepper trees described in response R5-11; "Maintained" means "preserved in place", "kept,", "not moved", "not touched", "not altered." All other plant materials are shrubs and low-lying plants that would be removed when the parking lot is installed and relocated to the new learning garden.

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

R5-13 This comment asserts that Section 3.6.1, *Construction Phasing*, is the only location within the DEIR that describes the removal of the existing student learning garden. A description of the relocation of the existing learning garden is provided in multiple locations in the DEIR including Section 3.5.1, *Project Characteristics*; Section 3.5.6, *Landscaping Improvements*; and Section 5.11, *Recreation*.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-14 The comment states that Table 4-3, *Existing Facilities*, and Table 4-4, *Existing Recreational Facilities*, does not reference the student learning garden.

Table 4-3 of the DEIR only includes the existing indoor classrooms on the McKinley ES campus; thus, the student learning garden would not be included in this table. Additionally, Table 4-4 of the DEIR includes the existing recreational facilities on the McKinley ES campus; however, the existing learning garden is identified as landscaped and open space, not a recreational facility.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-15 This comment states that Section 4.3.4, *Campus History*, omits the student learning garden.

As shown in Table 4-5, *Features in the Historic District*, and the Historic Resources Inventory Report prepared for the Proposed Project (Appendix F of the DEIR), the existing learning garden is not identified as a contributing element of the historic district.

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-16 This commenter was unable to find the Initial Study/Notice of Preparation (IS/NOP) (Appendix B) and IS/NOP Comments (Appendix C). The location of the DEIR and all appendices are described on page 2-4 of the DEIR and were posted on the District's website.

In compliance with §§ 15085(a) and 15087(a)(1) of the CEQA Guidelines, the SMMUSD, serving as the lead agency, published a Notice of Completion (NOC) and Notice of Availability (NOA) of the DEIR that indicate that the DEIR and all associated technical appendices can be viewed at the following locations:

- Santa Monica–Malibu Unified School District, 1717 4th Street, Santa Monica, CA 90401
- In addition, the DEIR is available online at the SMMUSD website: https://www.smmusd.org/Page/5594

The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact. This response merely amplifies or clarifies the analysis in the DEIR.

R5-17 This comment notes that Table 5.11-1, *McKinley ES Campus Open Space*, of Section 5.11, *Recreation*, incorrectly states that there is currently zero square feet of outdoor classroom space, because the student learning garden should be considered an outdoor classroom.

The existing learning garden is identified as landscaped and open space and not an outdoor classroom. The comment neither identifies a deficiency in the EIR's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required.

R5-18 The comment asserts that Chapter 7, Alternatives, of the DEIR does not include the relocation of the existing student learning garden.

As described on page 7-3 of the DEIR, under the No Project Alternative, the District would not approve any portion of the Proposed Project on the McKinley ES campus, and no demolition or relocations would occur under this alternative, because the existing

structures on the Proposed Project's Site would be retained. However, the No Project Alternative does not meet any of the Project's objectives. Additionally, this alternative would not realize any of the environmentally beneficial outcomes of the Proposed Project.

Additionally, the comment states that the District should consider an alternative location for the new parking lot at 23rd Court and Arizona Avenue, that would preserve the location of the existing student learning garden. Preservation of the location of the existing student garden would not result in the full benefits of reconfiguring the campus to provide safe student circulation (Objective 5) and reorganizing open space and foster intercampus circulation (Objective 6).

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

R5-19 This comment summarizes the viewpoints stated by the comments in comments R5-1 through R5-18 regarding the relocation of the existing student learning garden.

Please see responses to comments R5-1 through R5-18 above.

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

3. Revisions to the Draft EIR

3.1 INTRODUCTION

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

3.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

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

Page 5.6-1, Section 5.6, *Greenhouse Gas Emissions*. The following text has been updated in response to Comment O1-1 from the Santa Monica Families for Safe Streets.

No comments were received in response to the Initial Study/Notice of Preparation (IS/NOP) in regard to greenhouse gas emissions. The IS/NOP and all scoping comment letters are included as Appendices B and C of this DEIR. A California Environmental Quality Act (CEQA) scoping meeting was conducted on January 31, 2023, where verbal comments were received in response to the Initial Study/Notice of Preparation (IS/NOP) regarding the potential greenhouse gas impacts that would result from the Proposed Project. In addition, written comments were received regarding the potential impacts from greenhouse gas emissions in from implementation of the Proposed Project. These comments are considered in this section. The IS/NOP and all scoping comment letters are included as Appendices B and C of this document.

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

3. Revisions to the Draft EIR

Page 5.8-6, Section 5.8, *Hydrology and Water Quality*. The following text has been updated in response to Comment A1-2 from the City of Santa Monica.

- **Section 7.10.100 Runoff requirements for construction activity.** Requires BMPs for all construction activity in the City unless otherwise specified, including a Stormwater Pollution Prevention Plan (SWPPP) and Erosion and Sediment Control Plan.

- **Section 7.12.170 – Recycled Water Requirements.** Recycled water will be used within the City's recycled water service area in lieu of potable water for all approved uses consistent with all applicable federal, state, and local laws.

- **Section 7.16.020 Water conservation requirements.** Outlines outdoor watering restrictions to reduce spray and flow to any impermeable surface to limit surface runoff.

Page 5.8-7, Section 5.8, *Hydrology and Water Quality*. The following text has been updated in response to Comment A1-2 from the City of Santa Monica.

2018 Sustainable Water Master Plan. In 2014, the City adopted a Sustainable Water Master Plan (SWMP) with the goal of achieving water supply self-sufficiency in 2020 by eliminating reliance on imported water from the Metropolitan Water District (MWD). Since the adoption of the SWMP, the City has been actively implementing new water supply and conservation programs and policies. In November 2018, the City updated the SWMP, which outlines measures to achieve water supply self-sufficiency by 2023. The SWMP provides a combination of water demand reduction strategies and increased development of local water supplies. Water reduction is achieved through implementation of various water conservation and efficiency programs designed to permanently reduce residential and commercial water use. Development of new sustainable local water supplies comes from (i) alternative water sources such as captured rainwater and municipal wastewater for non-potable uses, (ii) increased efficiency of the City's water treatment systems, and (iii) additional pumping from existing wells and new wells in the local groundwater basin.

Page 5.12-13, Section 5.12, Transportation. The following text has been updated in response to Comment O1-1 from the Santa Monica Families for Safe Streets.

The City is developing local transportation funds to implement the proposed improvements based on the SRTS walking audits conducted in 2018 as described above (City of Santa Monica 2023). Once funding is secured, the City will coordinate with the District to implement these improvements. These improvements have already been identified by the City, as lead agency, as a separate project, and are in progress. The City is currently at 60 percent design for SRTS improvements around McKinley ES campus. Upon the City's completion of design for the McKinley SRTS projects, the City will be seeking construction bids for the development of those identified SRTS improvements. Once the procurement process is complete, the City anticipates construction of the SRTS projects to occur in 2024.

Page K-2, Appendix K, McKinley ES VMT and Trip Generation Memo. The following text has been updated in response to Comment O1-15 from the Santa Monica Families for Safe Streets.

The trip generation for ~~Grant~~ McKinley Elementary School was estimated using the rate published for Land Use Code 520 (Elementary School) in the Institute for Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021).

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

Page 3-31, **Section, 3.5.6 Landscaping Improvement**. The following text has been updated in response to Comment R4-5- from Ron Groezinger.

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. All existing mature trees in the historic main courtyard and at the ~~northwest corner of campus~~ student learning garden would be maintained.

3.3 FIGURE CHANGES

The following figures were revised to include a label for the existing and proposed student learning garden after publication of the DEIR and are included below:

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

Figure 3-7c - Proposed Project Site Plan - Phase 3 **[Revised]**

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

3. Revisions to the Draft EIR

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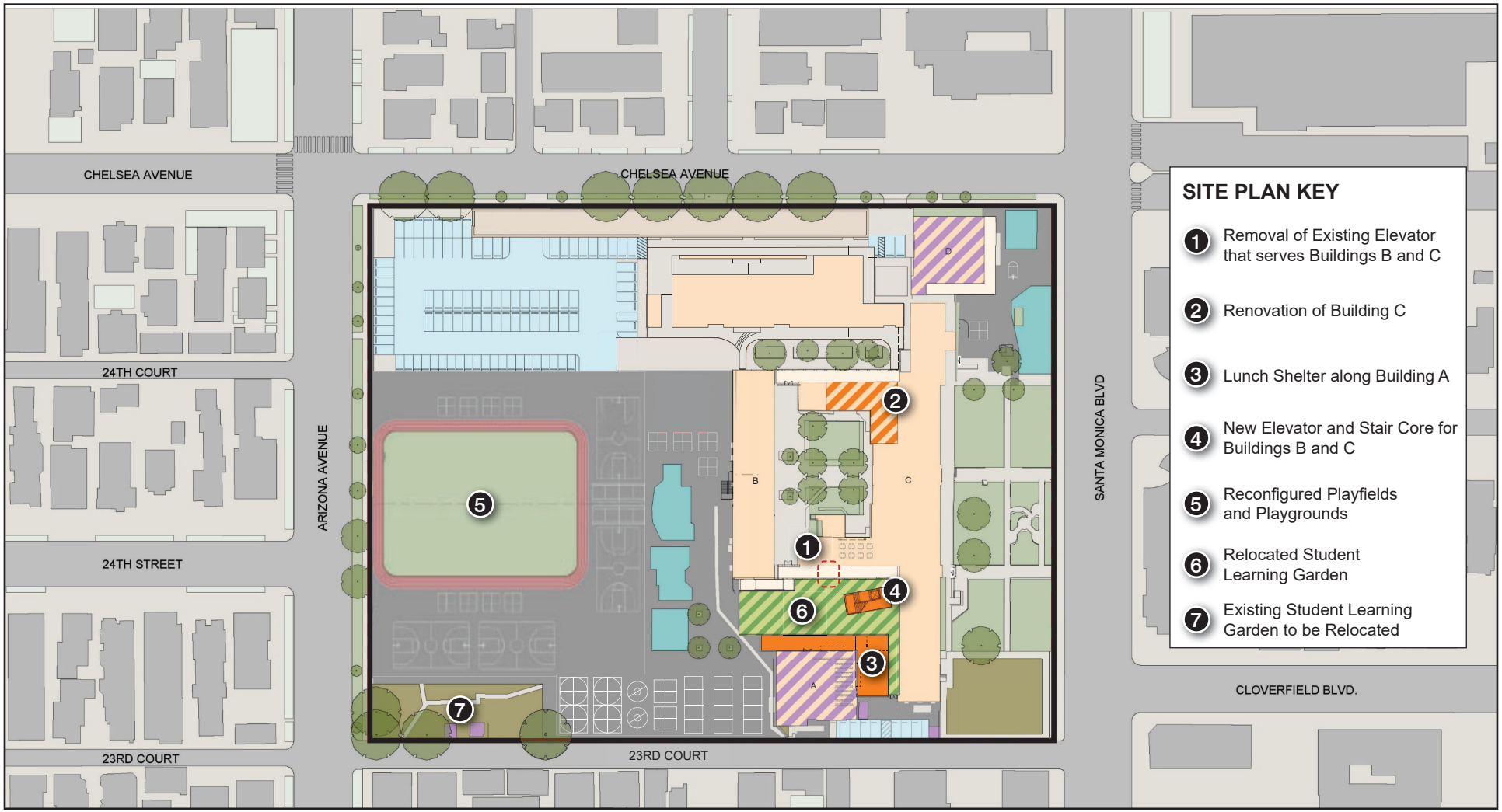
Figure 3-7b - Proposed Project Site Plan - Phase 2



Source: Johnson Favaro, 2022.

3. Revisions to the Draft EIR

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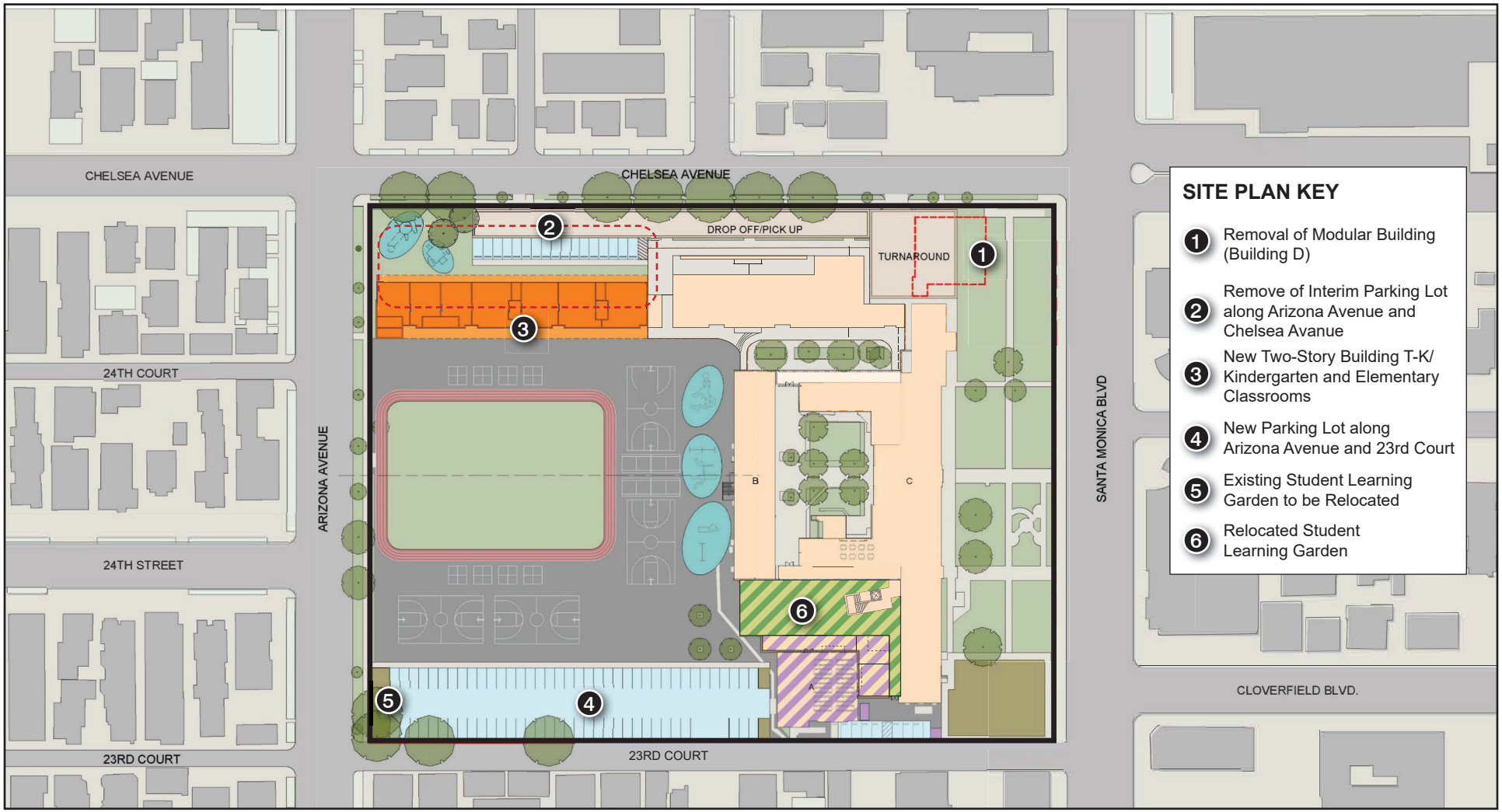
Figure 3-7c - Proposed Project Site Plan - Phase 3



Source: Johnson Favaro, 2022.

3. Revisions to the Draft EIR

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3.4 APPENDIX CHANGES

The following Draft EIR appendices have been revised or are new:

APPENDIX K McKinley ES VMT and Trip Generation Memo **[Revised]**

APPENDIX 1 "Street Design/Engineering Strategies" from 2021 Safe Routes Partnership Guidelines **[New]**

3. Revisions to the Draft EIR

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4. References

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Appendix K McKinley ES VMT and Trip Generation Memo

Appendices

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Memorandum

To/Attention	Arabesque Said-Abdelwahed, Placeworks	**Date**	March 20, 2023
From	Mike Arizabal, Arcadis IBI Group	**Project No**	136645
Subject	McKinley ES VMT and Trip Generation Study		

IBI Group is pleased to provide this Vehicle Miles Traveled (VMT) and Trip Generation Study in support of the environmental documentation for the renovation of McKinley Elementary School (2021 Campus Master Plan) in Santa Monica, California. The VMT and trip generation study were prepared to be consistent with the new process for analyzing the transportation impacts of land use projects as part of the recently adopted City of Santa Monica Department of Transportation (SaMoDOT) Impact Guidelines (June 2020).

PROJECT DESCRIPTION

The Santa Monica Malibu Unified School District-owned property is bordered by Arizona Avenue to the north, 23rd Court to the west, Chelsea Avenue to the east, and Santa Monica Boulevard to the south. The elementary school is surrounded primarily by low density multifamily residential, large scale institutional and mixed-use commercial. Ingress and egress to/from the campus is provided off Chelsea Avenue via two driveways (one inbound and one outbound).

The District proposes the following three (3) phases:

- Phase 1: Remove 11 portable classrooms and playground restrooms, remove northern portion of parking lot along Chelsea Avenue, construct eight (8) new classrooms, new front office, and school support spaces, and construct new PUDO area and interim parking lot
- Phase 2: Remove modular Pre-K classroom building and construct new TK/Kindergarten classroom building, faculty center, loggias and outdoor classrooms at main courtyard, lunch shelter, and exit stairs/elevator
- Phase 3: Remove Modular Building D, remove interim parking lot along Arizona Avenue and Chelsea Avenue, and construct new parking lot along Arizona Avenue and 23rd Court

VMT SCREENING

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

1. Does the project include the development of the following land uses, which are screened out from further analysis?

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

2. Is the project located within 0.5-mile walking distance of an Expo LRT station or 0.25 walking distance of Rapid BRT stop?

3. Would the project provide more parking than required by Code (or if located in the Downtown, exceed parking maximums)?

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

TRIP GENERATION STUDY

The trip generation for McKinley Elementary School was estimated using the rate published for Land Use Code 520 (Elementary School) in the Institute for Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition, 2021). The proposed project would not eliminate the school's existing programs, and it is not the intent of the project to expand the school enrollment capacity. The most recent student population figure was 688 students, approximately 48 of which are TK, and Kindergarten students and 640 students in Grades 1 through 5.

An estimated 1,562 daily trips are generated with 516 trips being in the AM (279 inbound and 237 outbound) and 310 trips in the PM (142 inbound and 167 outbound) and accounts for students who walk or are walked to school. Table 1 summarizes the estimated existing trip generation of the school based on a student population of 688.

Table 1 Project Trip Generation and Rates

Source	Land Use	Students	Trip Generation						
			Daily	AM Peak Drop-Off			PM Peak Pick-Up		
				In	Out	Total	In	Out	Total
			Rates						
ITE Code 520	Elementary School		2.27	0.41	0.35	0.75	0.21	0.24	0.45
			Estimated School Trips						
	TK, and K	48	109	19	17	36	10	12	22
	Grades 1-5	640	1,453	259	221	480	132	156	288
	Total	500	1,562	279	237	516	142	167	310

Trip generation rates: Institute of Transportation Engineers (ITE) Trip Generation Manual

The proposed project and associated components will not result in an increase in student population or enrollment. Therefore, a traffic study is not required per SaMoDOT guidelines and impacts related to traffic are presumed to be less than significant.

CONCLUSION

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

Appendix 1 "Street Design/Engineering Strategies" from 2021 Safe Routes Partnership Guidelines

Appendices

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Keep Calm and Carry On to School:
Improving Arrival and Dismissal for Walking and Biking

A student's experience arriving at school sets the tone for the entire school day. But often, the last block of the school commute is challenging and unwelcoming, in particular for students arriving on foot or by bicycle. School travel by family cars accounts for 10 to 14 percent of vehicle trips made during morning rush hour.[1] High traffic volumes near schools and disorganized drop offs and pick-ups mean that families feel afraid to let children walk or bicycle—resulting in even more cars at schools. Chaotic drop offs and pick-ups make the front of the school into a high stress environment, with negative effects on student safety and the learning environment. How can we improve safety and comfort during school arrival and dismissal for students walking and bicycling, encouraging more active travel versus drop off and pick up by car?

This infobrief provides information on how schools, school districts, cities and counties, and community partners can address arrival and dismissal in developing school travel plans, as well as other planning, policy, and programming efforts. While each school needs to employ specific approaches customized for its particular site configuration, adjacent street network, and surrounding neighborhood, this infobrief outlines general strategies, best practices, and considerations to improve school arrival and dismissal. We begin with an overview of key principles for a successful arrival and dismissal program and then describe specific strategies and techniques in three categories: engineering, operations and programming, and education and reinforcement.

Key Concepts

When developing and implementing a school arrival and dismissal program, keep in mind the following key overarching principles that apply to all school settings.

1. **Prioritize walking and biking:** When developing and implementing strategies, take care to prioritize walking and bicycling over cars. Vehicle drop offs create a variety of problems, endangering students walking and biking along the route to school, threatening those who have exited other cars or buses, and creating air pollution near schools that can worsen asthma and other chronic lung conditions. Improving arrival and dismissal for students walking and bicycling may have a secondary effect of improving traffic operations overall. But if an arrival and dismissal program makes drop off and pick up easier to the point that it encourages more families to drive their students to school, the overall effect is to worsen health, safety, and air quality for students. To support the well-being of students, strategies need to place the safety and comfort of students walking and bicycling first.

2. **Use a variety of approaches together:** A successful arrival and dismissal program requires using strategies that encompass multiple approaches from the 6 E's of Safe Routes to School: Engineering (changes to street design, parking lots, and the physical infrastructure or layout on and off campus), Education (providing information to and promoting awareness of proper behaviors by people driving, walking, and biking), Encouragement (programs that make it easier to and incentivize walking and biking), Engagement (listening to and working with students, families, teachers, and school leaders to create solutions), Evaluation (periodically assessing effectiveness of the program and adjusting as needed), and Equity (ensuring all students benefit from, and no groups are negatively affected by, the infrastructure, policies, and programs). Using just one approach is unlikely to address all of the issues – a strategy that involves engineering approaches coordinated with approaches from the other E's is often needed.

3. **Separate modes:** The biggest danger to children at arrival and dismissal comes when cars get close to children walking, biking, or exiting the bus. Separating the different modes of travel (private vehicles, buses, people walking, people bicycling) through engineering strategies, operational strategies, or both, is crucial in reducing conflicts in school zones and improving safety and comfort for everyone. Each mode needs a well-defined path of travel across school grounds. This includes making the paths for walking and bicycles highly recognizable and visible for children.

4. **Clearly communicate about who goes where:** An arrival and dismissal program should communicate who (people walking, biking, buses, cars) goes where clearly and consistently, through signs, pavement markings and other indicators at the school site, as well as through informational materials and messaging distributed to families and students.

Taking Steps to Improve Arrival and Dismissal

Improving arrival and dismissal at your individual school will require assessing what changes will be most appropriate, implementing changes with partners, and evaluating and adjusting. Here are some key steps.

1. **Assess existing conditions.** Observe school arrival and dismissal. Document challenges, including areas that are particularly congested or uncomfortable, as well as unsafe behaviors by drivers and students. Talk with families, students, bus drivers, and crossing guards and capture their thoughts as well. Worksheet such as this one from the Virginia Safe Routes to School Program can be used to document observations and input.
2. **Work with partners to identify potential solutions.** Key stakeholders to involve include school district facilities and transportation staff, school administration, and city or county transportation or public works staff.
3. **Create a plan.** This can be a formal document such as a circulation plan that with specific details regarding engineering changes and anticipated paths of travel, or a less formal plan that lays out key actions and steps each stakeholder will take.
4. **Implement changes.** Put engineering, operational and programmatic, and education strategies in motion. Permanent engineering changes may take longer to implement, but operational, programmatic and even temporary infrastructure changes using cones or other low-cost materials can often be put into place quickly.
5. **Evaluate and adjust.** Conduct follow up arrival and dismissal observations. Document what is working well and any areas that may not be working as anticipated. If there are aspects that can still be improved, work with partners to adjust, change, or add strategies.

School districts can support strong arrival and dismissal at new schools and improvements across existing schools by updating transportation policies and facilities planning and design policies and requirements to include provisions for students walking and biking that address the key concepts described in this infobrief.

Strategies and Techniques

School arrival and dismissal can be improved through strategies that include programming and changes to the infrastructure at and around the school. A combination of strategies is needed at most schools to successfully improve arrival and dismissal. The remainder of this infobrief describes best practices, considerations, and strategies and techniques in three categories: engineering; operations and programming; and education. These strategies are intended to address issues at existing school sites, but the underlying principles and concepts can be considered when designing new school sites in order to make arrival and dismissal safe and pleasant from the start.

Street Design/Engineering Strategies

Making sure that our physical spaces – streets and schools – are designed to be safe and comfortable for students walking and biking is at the heart of the engineering strategies discussed in this section. Engineering strategies are used to reduce or eliminate interaction between the different modes of travel at and around the school campus, and to improve comfort of students walking and biking. Each school site is different and the appropriate engineering strategies will depend on the school location and building layout, adjacent roads, and neighborhood context. This section starts with general best practices and considerations to support students walking and bicycling and then describes considerations for on-site as well as on-street/off-campus vehicle drop off and pick up areas.

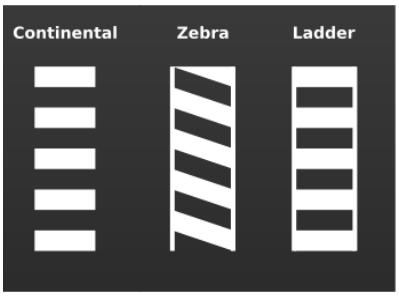
1. Best Practices to Support Students Walking and Bicycling

Here are best practices to support students walking and bicycling on and around the school campus.

- Walkways should be a minimum of eight feet wide to accommodate groups walking together.[2]
- Shared paths should be a minimum of 11 feet wide to accommodate both walking and biking.[3]
- Walkways should provide direct, easy access for people walking, avoiding inconvenience or cutting across areas that may be more dangerous.
- Illuminate walkways with pedestrian-oriented lights (not just high lights that illuminate the street for cars) that will be used in early or later dark hours.
- Design walkways to eliminate or minimize crossing driveways.
- Designate walking and bicycling routes that do not cross parking lots or vehicle drop off/pick up areas.
- Provide a continuous walkway across driveways. Retain sidewalk paving and level walking path.
- Provide high-visibility crosswalks when walkways have to cross driveways, parking lots, or other vehicle areas.

Left: Level walking path provides a continuous walkway across a driveway. Right: Trees improve the attractiveness of the walking path, and pedestrian-oriented lighting ensures visibility for people walking in early or later hours.

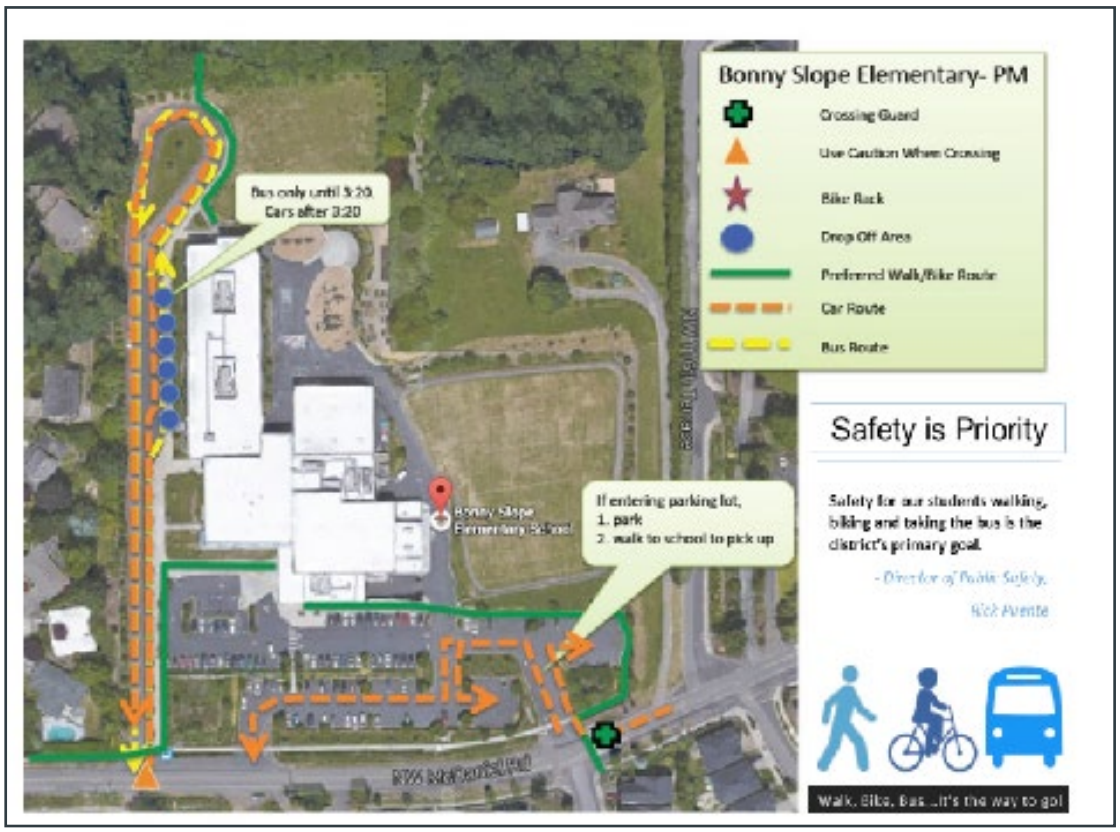
- Minimize driveway width to reduce exposure time for pedestrians and slow speeds of cars turning.[4]
- Provide easy and direct access to bike parking without requiring people biking to dismount until they reach the bike racks.
- Families may prefer to walk with their student all the way to the school door. Entrances should have space around them to accommodate this.
- Consider landscaping, shade elements such as canopies, art features, and other ways to make walkways attractive and welcoming for people on foot.
- Consider destinations where students may go before or after school, whether adjacent, across the street, or nearby. Assess the pedestrian and bicycle linkages to nearby parks, libraries, community centers, food retail locations, and other facilities that attract students.



Examples of crosswalk treatments that improve visibility when walkways cross driveways, parking lots, or other vehicle areas.

2. Best Practices and Considerations for On-Site Vehicle Drop Off and Pick Up Areas

- When the school layout allows for it, provide paths for students to enter campus on foot or by bike from the neighborhood that are completely separated from parking lots, car drop off and pick up areas, and bus loading. This addresses many safety issues and creates a more comfortable environment for students walking and bicycling.
- Separating drop off and pick up areas, parking lots, and bus loading is the most desirable configuration, where space allows. This prevents parents from bypassing the drop off/pick up area and using the parking lot or bus area where students would need to walk between parking cars or buses. Use cones or signage to let parents know to not enter the parking lot or bus area.
- Some schools across the country have received approval to use the fire lane as a temporary pick up/drop off lane. This requires approval from the fire marshal.
- Vehicles should move through the drop off/pick up area counterclockwise and students should be able to enter and exit directly to the sidewalk without having to walk around or between cars. This should also be done for bus loading and unloading.
- A single drop off/pick up line is most desirable to prevent students from having to walk between cars. If absolutely necessary, a second line can be formed, but staff or volunteers need to assist students with crossing between cars.
- Plan adequate space to queue vehicles without blocking sidewalks, crosswalks, and walkways. The space needed will depend on how many cars are expected at the individual school. If adequate space is not available for queuing, consider adding off-site areas. If queuing potentially crosses sidewalks, crosswalks, or walkways, assign a person to keep these areas clear of cars.
- One way to allow for off-site queuing is to stripe a center turn lane for cars to pull into and wait while not blocking through traffic.
- Moving thorough the drop off/pick up area should never require a car to back up.
- Drop off/pick up areas should have all or most vehicles exit by making a right turn, avoiding left turns that require cutting over a lane of traffic. Avoid having crosswalks close to the driveway exit where drivers may be more focused on turning and less likely to be watching for people crossing the street.
- The grade for all vehicle paths on-campus should be a maximum of 5 percent to prevent visibility issues caused by slope.[5]
- Ensure adequate sight lines by prohibiting parking or stopping in or near intersections and crosswalks. Twenty feet from intersections and crosswalks is generally acceptable. Also take into consideration height of children when determining sight line needs.

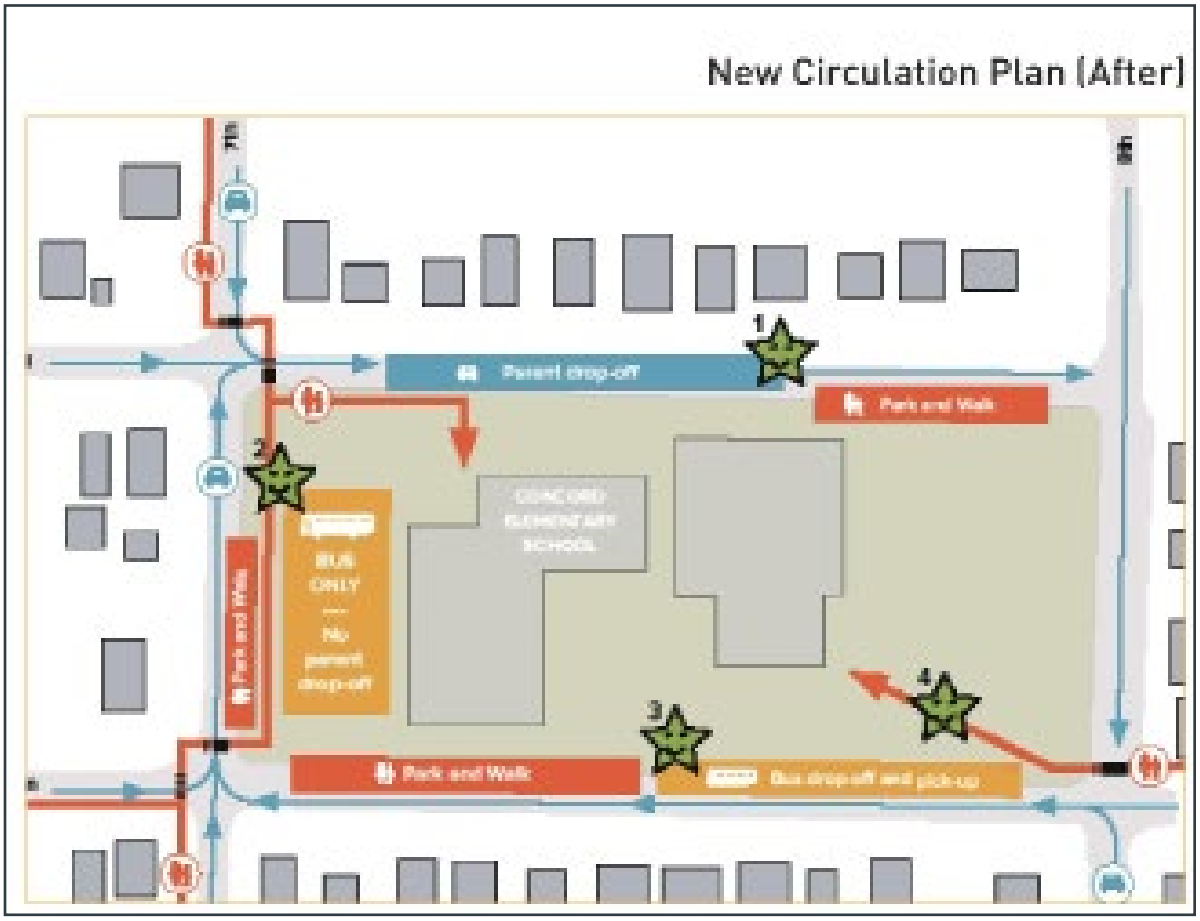


Left: An example of on-site pick up. Circulation plan shows cars are only allowed on campus after buses leave. Pick up lane is separated from parking area. Students are able to leave the campus on foot or bike in different directions. From Beaverton Safe Routes to School.

3. Best Practices and Considerations for On-Street (Off-Campus) Drop Off and Pick Up Areas

As an alternative to on-campus pick up and drop off areas, on-street (off-campus) areas can be designated. This requires working with the local traffic engineering or public works department that controls the streets adjacent to the school to design a plan that considers other property owners and traffic patterns.

- On-street drop off and pick up areas are most appropriate when there is not a lot of other non-school traffic and when the drop off and pick up areas can function without blocking driveways and access to other properties.[6]
- Treat on-street drop off and pick up areas as you would do on-campus areas. Provide very clear travel paths for vehicles as well as students walking and bicycling. Use a single drop off/pick up lane and only allow students to enter/exit from the curb. See the section above for other best practices and considerations for on-campus areas.
- Be sure to consider the flow of non-school traffic and other neighbors. Frustration can lead to angry neighbors, drivers cutting around other cars, and unsafe behaviors that endanger students.
- Preferred strategies and configurations will depend on the local context. Options include creating one-way streets, partial road closures, or full road closures. These could be done temporarily by using cones, signage, and blockades during arrival and dismissal, or may be permanent changes.
- A clear plan should be provided to drivers that shows where and how to drop off/pick up. Without a clear plan, unsafe behaviors such as double parking, cars making unsafe U-turns, and students walking between cars can become concerns.
- Signs and markings should follow consistent general standards to ensure that users understand them easily and avoid confusion. On-street curb markings, pavement markings, and signs should, and are likely legally obligated to, follow adopted standards, such as those in the Manual on Uniform Traffic Control Devices (MUTCD). This promotes clear messages to drivers, pedestrians, and bicyclists that are consistent with signage and markings that they see elsewhere.



Right: An example of on-street drop off. Circulation plan shows parent drop off is only on the north side of the school, separate from bus loading. The parking lot is closed to families. There are designated walkways outside of the drop off areas for students to walk. From Improve Your School Arrival and Departure Procedures: A Toolkit for School Safety Committees, Feet First.

Operational and Programmatic Strategies

Operational and programmatic strategies include arrival and dismissal procedures and supportive programs that can improve driver behavior, reduce or eliminate interaction between cars and students walking and bicycling, and promote more walking and bicycling overall. Operational and programmatic approaches encompass strategies from the Encouragement "E" of Safe Routes to School. Here are some operational and programmatic strategies that can be considered.

1. Staggered Dismissal

Staggering dismissal times reduces the amount of congestion at and around the school during peak times. Dismissal times can be staggered by grade to reduce the number of parents picking up at once. Dismissal times can also be staggered by mode of travel to reduce conflicts between the different modes. If you are staggering dismissal by mode of travel, walkers and bicyclists should always be dismissed first as to not discourage walking and biking.

Dismissal Procedures

Front Cross Walk Closed : until further notice	3:47 pm- 3:55 pm
Staggered Dismissal Times: / Car Riders 3:45 pm	Walkers 3:40 pm
Playground Closed:	3:40-4:00 pm

Walkers, Bikers, Parents Walking to Pick up Students

- Dismissal at 3:40 pm MTRF 2:10 pm on Wednesday
- Exit from the Kindergarten Door, North side of building no front door dismissal

Car Riders

- Dismissal at 3:45 pm
- Exit from the **Front Door**
- **Stand in grade level designated area on blue line on main sidewalk Kdg. will stand in front of the kdg. doors.**
- **Students with siblings- older students will stand with youngest sibling**
- **All students should enter and exit their car curb side they should not exit street side and parents should stay inside the vehicle**

Bus Riders & Boys and Girl Club

- Dismissal from club

Above: Dismissal procedures from Langston Hughes Elementary

2. Remote Drop Off/Pick Up

One way to reduce traffic congestion at the school campus is to designate areas away from the campus for parents to drop off and pick up their children. These are also called "walk on in" programs. In a remote drop off program, children are driven most of the way to school, but are then dropped off a short distance from school – often a quarter mile – so they can walk the remainder of the way. A remote drop off site may be a park, a parking lot, a church, or anywhere else where students can be easily dropped off, can safely congregate, and can follow a relatively safe route to the school.

Once children are dropped off, they may be accompanied to school by a school bus driver, teacher, or adult volunteer, or may walk on their own, depending on their age and how the program is structured. Some school transportation departments have school buses drop students off at remote drop off sites as well.

Besides reducing traffic congestion at the school campus, remote drop off programs can have a physical activity goal. In such programs, the remote drop off locations may be located further away to increase the distance students are walking.

Image: Orange County Health Care Agency

3. Walking School Bus

A walking school bus is a way for children to travel to and from school on foot with adult supervision. It offers a safe, dependable, active way for children to get to school versus being driven in a car. It reduces the number of cars at and around the school, while encouraging students to walk. Each "bus" walks along a set route with one or more adults leading it, picking children up at designated stops along a predetermined route and walking them to school. The process is reversed in the afternoons on the way home from school. Refer to Step by Step: How to Start a Walking School Bus at Your School for more information.

4. Assisting Students with Exiting/Entering Cars (Valet System)

While a valet system on its own does not improve arrival and dismissal for walking and bicycling, in can lead to more organized drop off and pick up and reinforce proper driver behavior. In a valet system, staff, volunteers, or older students help students enter and exit cars by prompting cars to move forward in the line, opening doors, and helping students enter/exit safely to/from the curb. The valets can encourage students to exit on the right side of the car and discourage cars from cutting around one another. A best practice to reduce delays and promote organization is to load and unload multiple cars at a time by having three to four cars pull into the designated area at once.

5. Encouraging Carpooling

Carpooling does not necessarily encourage walking and bicycling, but it can reduce the number of cars at and around the school during peak hours, which can reduce conflicts and improve safety and comfort overall. Some schools encourage carpooling by creating a priority lane for carpool pick up/drop off or only allowing carpool cars to enter the lane during certain hours (i.e. first at pick up). An online or other matching program can help families find carpool partners.

Additional Resources

- School On-Site Design from Institute of Transportation Engineers provides additional information on engineering strategies to improve school campuses for students walking and bicycling.
- Walk to school? But how do I find the front door from WalkBoston provides guidance on creating a walkable school campus.
- Improve Your School Arrival and Departure Procedures: A Toolkit for School Safety Committees from Feet First provides worksheets and templates for school and parent groups to assess and implement changes to school arrival and dismissal.
- Best Practices Guide for School Carpool Lines from Clean Air Carolina provides additional information about organizing a successful carpool program.

Education Strategies

A successful arrival and dismissal program must include educating students and families on the arrival and dismissal procedures and proper behaviors. Here are some strategies to provide education around arrival and dismissal.

1. Education

Education should include clear and consistent communication on procedures to both students and families. We all need reminders! Communication should happen multiple times a year: when school starts, at the start of a new term, and periodically throughout the year as needed. To reach every family, a good rule of thumb is to use at least five different communication methods.[7] What works best for each school may vary.

Strategies include:

- Automated phone calls
- Information tables at school events
- PTA meeting presentations
- Website
- Social media
- Listserv or other email reminders
- Flyers
- School newsletters
- Signs on campus

In addition to these, the information should be provided in start of the year paperwork, enrollment packets and/or school handbooks. Circulation plans are helpful in providing clear direction to families and students. It may be best to have a graphic designer or someone with graphic communications experience create the plans to ensure they are easy for families understand. Make sure to provide materials in the languages spoken by your school's families.

Other educational program strategies include:

- **Student safety patrols.** Upper grade students are trained to assist other students with navigating challenging areas like driveways and reinforcing safe behaviors with the support of school staff, adult volunteers or crossing guards.
- **Crossing guards.** Crossing guards can promote safe behaviors of students walking and biking as well as remind drivers of the rules.
- **Verbal and written reminders from school staff.** This could include "reminder slips" that are placed on cars or handed out by school staff or verbal reminders for drivers as well as students.

Conclusion

Improving school arrival and dismissal can be transformative, changing the critical time at the start and end of the school day from a chaotic, stressful experience to one where students and families feel comfortable, relaxed, and welcomed. By taking the steps suggested in this resource, you can assess existing conditions, identify areas that could be improved, and work with partners to make change.

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7. Improve Your School Arrival and Departure Procedures: A Toolkit for School Safety Committees, Feet First

ARCHITECTURE + URBAN DESIGN

JOHNSON FAVARO

May 10, 2023

TO: Carey Upton, SMMUSD

FROM: Jim Favaro, Principal, Johnson Favaro

RE: **SMMUSD McKinley School Campus Plan Features in Conformance with 2021 Safe Routes Partnership Guidelines**

Carey,

At your request, please find below our summary of the features of the McKinley School Campus Plan which are consistent with the goals and guidelines provided by the Safe Routes Partnership, Keep Calm and Carry On to School: Improving Arrival and Dismissal for Walking and Biking ("Guidelines") (attached). As described below in detail, no features of the McKinley School Campus Plan's design would conflict with Guidelines.

The Guidelines set forth various strategies for providing safe routes to school. These Strategies are divided into three categories:

1. Street Design/Engineering
2. Operations and Programmatic
3. Education

As the architect for the McKinley School Campus Plan, we are involved with only the first of these, Street Design/Engineering and will in this memorandum focus our comments on the design features of the campus master plan related to drop-off and pick-up, parking, approach, and entry onto campus on foot, bicycle, and by bus. We are not commenting on the two other Strategies, Operations and Programmatic and Education.

I. MCKINLEY ELEMENTARY SCHOOL CAMPUS MASTER PLAN OVERVIEW

One of the main goals of the campus master plan has been to deliver safer accommodations of vehicles and pedestrians on campus and as they enter and leave campus. These are described here beginning at the end with the completion of the campus plan in Phase 3.

5898 BLACKWELDER STREET CULVER CITY CA 90232 T 310.559.5720 F 310.559.8220 www.johnsonfavaro.com

Phase 3

- Parking for school staff will have been completely separated from daily drop-off and pick-up operations with the new lot located at the NW corner campus at Arizona and 23rd Court. Access to this parking lot by vehicles will locate far from where students will enter campus at the start and end of the school day either on foot or bicycle or via the drop-off/pick-up queue lane along Chelsea Ave.
- The drop-off and pick-up lane is two lanes wide to allow for maximum flexibility in operations. (For example, school/district could allow passage of buses in one lane while drop-off and pick-up is occurring in the other closest to the school main entrance and/or it could allow vehicles in the passenger vehicle queue to depart the queue without having to wait in line behind other vehicles).
- The turnaround at the south end of the drop-off/pick-up queue is sized for buses and vehicles and can be used in conjunction with queue lane or separately (for buses for example). With the turnaround in place the length of the vehicle queue lane approaches 400 FT.
- Additional drop-off and pick-up queue length is provided along the west side of Chelsea north around the corner and along the south side of Arizona Avenue.
- Only two vehicular entrances/exits are provided along Chelsea. The north curb cut and entry drive provides entry into the queue lane across from the first alley south of Chelsea Avenue (roughly where the entry drive is in the existing condition) while the south curb cut and exit drive provides exit onto Chelsea at about 180 FT north of the corner of Chelsea Avenue and Santa Monica Boulevard.
- Circulation in the queue lane is one-way and counterclockwise so that students exit vehicles on the passenger side of the car directly into the sidewalk and into the school entrance.
- Students who arrive on foot or bicycle will enter off of the sidewalk along Chelsea Avenue at the north and south ends of the vehicular queue lane and turnaround thus avoiding have to cross any vehicular traffic.to get onto campus from the sidewalk.

Phase 2

See Phase 1

Phase 1

- The staff parking lot relocates from its current location at the front entrance to the school to a new location at the NE corner of campus at the corner of Chelsea Ave and Arizona Avenue.
- The drop-off/pick-up lane provides 280 FT of vehicular queue.
- Additional drop-off and pick-up queue length is provided along the west side of Chelsea north around the corner and along the south side of Arizona Avenue The entrance to and exit from this parking lot will be shared with the entrance drive to the vehicular drop-off/pick-up lane across from the first alley south of Chelsea Avenue (roughly where the entry drive is in the existing condition)-.
- While access to parking and the queue lane is shared the parking lot itself is still completely separated from the queue lane.
- Students on foot and bicycle will access campus from the NE and SE along the Chelsea Ave sidewalk without having to cross vehicular entry or exit to campus, while those arriving from the NE will have to cross one vehicular entry drive.
- The apron of this entrance driveway is consistent with the Safe Routes Partnership Guidelines in that it will keep the sidewalk across the drive at sidewalk level to maximize pedestrian safety.
- School/district policies will prevent staff from entering or exiting the parking lot during the 15-20 minutes at the start and finish of the school day during drop-off and pick-up operations.

Below we have responded to each of the recommendations of three categories of recommendations under the STREET DESIGN/ENGINEERING section of Guidelines. The three categories are;

1. **Best Practices to Support Students Walking and Bicycling**
2. **Best Practices and Considerations for On-Site Vehicle Drop Off and Pick up Areas**

3. Best Practices and Considerations for On-Street (Off Campus) Drop Off and Pickup Areas

In the left column is the Guidelines' recommendation and in the right column a description of how the McKinley School Campus Plan at completion of Phase 3 is consistent with and/or exceeds the goals of the Guidelines' recommendations.

II. CONSISTENCY WITH BEST PRACTICES IDENTIFIED IN THE "STREET DESIGN/ENGINEERING STRATEGIES" SECTION OF THE SAFE ROUTES GUIDELINES

A. Best Practices to Support Students Walking and Bicycling

	Safe Routes Info Brief Recommendations	McKinley Campus Plan at Completion of Phase 3
1	Walkways should be a minimum of eight feet wide to accommodate groups walking together	Sidewalks along Arizona Avenue and Chelsea Avenue are 7'-6" wide; Walkways on campus are 11 FT wide.
2	Shared paths should be a minimum of 11 feet wide to accommodate both walking and biking	Bicycles are not allowed on sidewalks along Arizona Avenue and Chelsea Avenue. Walkways on campus that lead to school- entry are 11 FT wide.
3	Walkways should provide direct, easy access for people walking, avoiding inconvenience, or cutting across areas that may be more dangerous	Pedestrians and bicycles arriving to campus from the sidewalks along the streets and bike lanes on the streets do not cross vehicular traffic while getting onto campus or on campus.
4	Illuminate walkways with pedestrian-oriented lights (not just high lights that illuminate the street for cars) that will be used in early or later dark hours.	All walkways and paths onto campus and into school buildings as well as all walkways and paths on campus are provided with a minimum 1FT candle lighting level in compliance with California Building Code (CBC)
5	Design walkways to eliminate or minimize crossing driveways	Students can arrive from the north and south along the Chelsea Avenue sidewalk directly to walkways on campus that lead to the school front door without having to cross a vehicular driveway (of which there are two on Chelsea Avenue). Phase 1 minimizes crossing driveways with only one driveway that would need to be crossed and only when arriving from the NE.
6	Designate walking and bicycling routes that do not cross parking lots or vehicle drop off/pick up areas.	No student walking/bicycling path from Arizona, Santa Monica Blvd. or Chelsea sidewalks to the school entrance crosses parking lots or drop-off/pick-up areas.
7	Provide a continuous walkway across driveways. Retain sidewalk paving and level walking path	Students who arrive to campus as pedestrians and cyclists are able to enter campus without crossing driveways. Pedestrians other than students who walk along the west sidewalk of Chelsea Avenue cross two Cheslea Ave driveways into and out of the drop-off/pickup queue lane both of which will maintain sidewalk level for their full width.

8	Provide high-visibility crosswalks when walkways must cross driveways, parking lots, or other vehicle areas.	Highly visible striping will be provided at sidewalks as they cross the two Chelsea Avenue driveway entrances. No crossing of vehicle and pedestrians occurs on campus.
9	Minimize driveway width to reduce exposure time for pedestrians and slow speeds of cars turning	The two new Chelsea Avenue driveway widths are 20 FT wide the minimum allowed and 11 feet narrower than the existing driveway widths.;
10	Provide easy and direct access to bike parking without requiring people biking to dismount until they reach the bike racks.	Bicyclists arrive from Chelsea Ave sidewalk along an 11 FT wide walk on campus that avoids all vehicular paths to arrive at bike racks at the school front entrance.
11	Families may prefer to walk with their students all the way to the school door. Entrances should have space around them to accommodate this.	The front loggia will provide space for families walking their students to the school door. The front of school will be covered, 10 feet in depth and set back from the drop/-off pick-up lane by six feet. There will be a total of sixteen feet in front of the door to the front office and many more feet in front of the daily front gate where students will enter campus.
12	Consider landscaping, shade elements such as canopies, art features, and other ways to make walkways attractive and welcoming for people on foot.	The front loggia will provide a sense of welcoming enclosure, open air, shelter from the elements and lots of shade. Trees along the Chelsea front of school will provide ample shade upon entry to campus.
13	Consider destinations where students may go before or after school, whether adjacent, across the street, or nearby. Assess the pedestrian and bicycle linkages to nearby parks, libraries, community centers, food retail locations, and other facilities that attract students.	Students can reach all sidewalks at the perimeter of campus without having to cross vehicular circulation from where they may make their way to neighborhood amenities.

B. Best Practices and Considerations for On-Site Vehicle Drop Off and Pick Up Areas		
	Safe Routes Info Brief Recommendations	**McKinley Campus Plan at Completion of Phase 3**
1	When the school layout allows for it, provide paths for students to enter campus on foot or by bike from the neighborhood that are completely separated from parking lots, car drop off and pick up areas, and bus loading. This addresses many safety issues and creates a more comfortable environment for students walking and bicycling.	All staff parking will be on the opposite side of campus at the corner of Arizona Avenue and 23rd Court from where students arrive on campus at Chelsea Avenue and enter the school. About fifteen visitor parking spaces are provided at the front of campus accessed from the on campus vehicular drop-off/pickup lane, but access to and from those spaces will be prohibited for 15-20 minutes during drop-off/pick-up times at start and finish of school day.
2	Separating drop-off and pick up areas, parking lots, and bus loading is the most desirable configuration, where space allows. This prevents parents from bypassing the drop off/pick up area	The drop off/pick-up lane and arrival court operate completely independently of the parking lot. The arrival court accommodates should the school/district choose buses that can drop-off and pick-up

	and using the parking lot or bus area where students would need to walk between parking cars or buses. Use cones or signage to let parents know to not enter the parking lot or bus area.	on campus independently of the passenger vehicular drop-off/pick up operation
3	Some schools across the country have received approval to use the fire lane as a temporary pick up/drop off lane. This requires approval from the fire marshal.	Not necessary on this campus-.
4	Vehicles should move through the drop off/pick up area counterclockwise and students should be able to enter and exit directly to the sidewalk without having to walk around or between cars. This should also be done for bus loading and unloading.	On campus vehicular drop-off/pick-up circulates counterclockwise with students exiting and entering vehicles from passenger side of car directly onto and from the sidewalk in front of the school entrance. Same goes for bus drop-off and pick-up.
5	A single drop off/pick up line is most desirable to prevent students from having to walk between cars. If necessary, a second line can be formed, but staff or volunteers need to assist students with crossing between cars.	Vehicles circulate and stop along the drop-off/pick up lane in single file adjacent to the sidewalk adjacent to the school front door and daily student entrance.
6	Plan adequate space to queue vehicles without blocking sidewalks, crosswalks, and walkways. The space needed will depend on how many cars are expected at the individual school. If adequate space is not available for queuing, consider adding off-site areas. If queuing potentially crosses sidewalks, crosswalks, or walkways, assign a person to keep these areas clear of cars.	Due to site constraints, there is the possibility that drop-off/pick-up queuing will cross crosswalks at the corner of Chelsea Avenue and Arizona Avenue. However the District will implement an information program to inform drivers how drop-off and pick-up are to occur in the vicinity of campus so that no vehicles block these cross walks at drop-off/pickup times.
7	One way to allow for off-site queuing is to stripe a center turn lane for cars to pull into and wait while not blocking through traffic.	A center turn lane on Chelsea Avenue is not necessary.
8	Moving thorough the drop off/pick up area should never require a car to back up.	No cars in the drop-off/pickup queue lane will have to back up.
9	Drop off/pick up areas should have all or most vehicles exit by making a right turn, avoiding left turns that require cutting over a lane of traffic. Avoid having crosswalks close to the driveway exit where drivers may be more focused on turning and less likely to be watching for people crossing the street.	Exit from the drop-off/pickup queue lane onto Chelsea Ave favors a right turn toward Santa Monica Blvd which is the most heavily used street in the vicinity of campus..
10	The grade for all vehicle paths on-campus should be a maximum of 5 percent to prevent visibility issues caused by slope.5	All vehicle paths are 2% or less.

11	Ensure adequate sight lines by prohibiting parking or stopping in or near intersections and crosswalks. Twenty feet from intersections and crosswalks is generally acceptable. Also take into consideration height of children when determining sight line needs.	There is no on-campus parking in the vicinity of the entry and exit to the drop-off/pick-up queue lane.

C Best Practices and Considerations for On-Street (Off-Campus) Drop Off and Pick Up Areas		
	Safe Routes Info Brief Recommendations	**McKinley Campus Plan at Completion of Phase 3**
1	On-street drop off and pick up areas are most appropriate when there is not a lot of other non-school traffic and when the drop off and pick up areas can function without blocking driveways and access to other properties.	This is possible along the west side of Chelsea Avenue near Arizona avenue around the corner and along the south side of Arizona across the full width of the north of campus—all in the area occupied by parallel parking in the street. Accommodations of drop-off and pick-up operations in the street adjacent to the sidewalk is not a Project design consideration.
2	Treat on-street drop off and pick up areas as you would do oncampus areas. Provide very clear travel paths for vehicles as well as students walking and bicycling. Use a single drop off/pick up lane and only allow students to enter/exit from the curb. See the section above for other best practices and considerations for on-campus areas.	This is not a Project design consideration.
3	Be sure to consider the flow of non-school traffic and other neighbors. Frustration can lead to angry neighbors, drivers cutting around other cars, and unsafe behaviors that endanger students.	Street flow was considered and accounted for in the design, which will provide safe and smooth circulation for both vehicles and pedestrians.
4	Preferred strategies and configurations will depend on the local context. Options include creating one-way streets, partial road closures, or full road closures. These could be done temporarily by using cones, signage, and blockades during arrival and dismissal, or may be permanent changes	This is not a Project design consideration.
5	A clear plan should be provided to drivers that shows where and how to drop off/pick up. Without a clear plan, unsafe behaviors such as double parking, cars making unsafe U-turns, and	The District will implement an information program to inform drivers how drop-off and pick-up are to occur.

	students walking between cars can become concerns	
6	Signs and markings should follow consistent general standards to ensure that users understand them easily and avoid confusion. On-street curb markings, pavement markings, and signs should, and are likely legally obligated to, follow adopted standards, such as those in the Manual on Uniform Traffic Control Devices (MUTCD). This promotes clear messages to drivers, pedestrians, and bicyclists that are consistent with signage and markings that they see elsewhere.	Signage and markings will be provided.

END MEMORANDUM

Attached: Exhibit A "McKinley School Campus Plan at Completion of Phase 3 Vehicular and Pedestrian Circulation to and from Campus"

PASSENGER VEHICLE ENTRANCE OFF OF CHELSEA AVENUE

ONE WAY PASSENGER VEHICLE QUEUE LANE, STUDENTS EXIT PASSENGER SIDE OF VEHICLE, CIRCULATION IS COUNTER CLOCKWISE

PASSENGER VEHICLE EXIT ONTO CHELSEA AVENUE (RIGHT TURN ONLY AT DISTRICT DISCRETION)

NO ACCESS ALLOWED DURING DROP-OFF/PICK-UP OPERATIONS AT START AND FINISH OF SCHOOL DAY TO VISITOR PARKING

TURNAROUND FOR ADDITIONAL PASSENGER VEHICLE QUEUE LENGTH AND/OR SEPARATE BUS DROP-OFF/PICK-UP

ADDITIONAL VEHICLE QUEUE LENGTH ON STREET IN PARALLEL PARKING ZONE IF/AS NECESSARY

SECONDARY PEDESTRIAN ENTRANCE/EXIT

STUDENT ENTRANCE TO SCHOOL THROUGH MAIN GATES (HIGH VOLUME AT DROP-OFF AND PICK-UP AT START AND FINISH OF SCHOOL DAY)

STUDENT ENTRANCE TO SCHOOL THROUGH FRONT OFFICE (LOW VOLUME, MAINLY LATE OR ILL STUDENTS)

CHELSEA AVENUE

CHELSEA AVENUE

PARK DR

DROP OFF/PICK UP

TURNAROUND

24TH COURT

ARIZONA AVENUE

SANTA MONICA BLVD

24 TH STREET

24TH STREET

NEW PARKING LOT

CLOVERFIELD BLVD.

23RD COURT

23RD ST

B

C

A

PEDESTRIAN CIRCULATION

VEHICULAR CIRCULATION

N

0' 40' 80' 160'

PHASE 2 SITE PLAN

SAFE ROUTES 5.04.23 JOHNSON FAVARO MEMORANDUM EXHIBIT A

JOHNSON FAVARO

8/12/2022 5:17:00 PM