

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

**Roosevelt Elementary School
Campus Plan Project**

**Final Environmental Impact Report
SCH# 2023090499**

Prepared for:

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT
Facility Improvement Projects
1717 Fourth Street
Santa Monica, CA 90401

Prepared by:

Michael Baker
INTERNATIONAL

Michael Baker International
3760 Kilroy Airport Way, Suite 270
Long Beach, CA 90806

DECEMBER 2024

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1.1 INTRODUCTION

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

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

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

This document contains the comments received and the Santa Monica-Malibu Unified School District's (SMMUSD or District) responses to comments received on the Draft EIR for the Roosevelt Elementary School Campus Plan Project (Proposed Project) during the public review period, which began September 16, 2024, and ended October 31, 2024. This document represents the independent judgment of the District who is the Lead Agency for the Proposed Project. This document and the circulated Draft EIR make up the Final EIR, 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 the contents of this Final EIR.

Section 2, Comments and Responses to Comments. This section provides a list of agencies, organizations, and interested persons commenting on the Draft EIR, copies of comment letters received during the public review period, and the District's responses to those comment letters. This section also includes responses to written and verbal comments received at the community meeting held by the SMMUSD on September 25, 2024, regarding the Draft EIR. 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 O2 for a set of verbal comments received from the same organization at the public meeting; and I1 and I2 for verbal comments received at the public meeting from individuals. Each comment within the letters and set of verbal comments from each speaker at the public meeting have been numbered and the comment letter is followed by responses with references to the corresponding comment number.

Section 3. Revisions to the Draft EIR. This section identifies revisions to the Draft EIR to make clarifications and insignificant modifications following public comment.

1.0 INTRODUCTION

1.3 PUBLIC REVIEW PROCESS

Pursuant to the requirements of CEQA, the environmental review process for the Proposed Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties and members of the public, on the scope of the Draft EIR through a Notice of Preparation (NOP) process. In accordance with CEQA Guidelines section 15082, the District prepared the NOP for the Proposed Project and issued and published it on September 11, 2023, for a public review period through October 20, 2023. The NOP was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the scope of the Draft EIR. The District held an in-person community meeting introducing the Proposed Project and the CEQA comment and review process on September 26, 2023, at Roosevelt Elementary School to facilitate public comments during the scoping period.

Consistent with the requirements of CEQA Guidelines sections 15087 and 15105, the Draft EIR was submitted to the State Clearinghouse, California Governor's Office of Land Use and Innovation, and was circulated for a 45-day public comment period commencing on September 16, 2024, and ending on October 31, 2024. The District held an in-person community meeting summarizing the EIR results on September 25, 2024, at Roosevelt Elementary School to facilitate and encourage the public's review and comment on the Draft EIR. Following the Draft EIR public comment period, this Final EIR has been prepared and includes the responses to the comments raised regarding the Draft EIR.

2.0 COMMENTS AND RESPONSES 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 Draft EIR and prepare written responses to them.

This Section provides all written and oral comments received on the Draft EIR and SMMUSD's responses to each comment that is germane to CEQA.

Comment letters/emails and specific comments are identified with alphanumeric number references for citation purposes.

The following seven agencies, organizations, and persons submitted comments on the Draft EIR during the public review period:

Number Reference	Commenting Person/Agency	Comment Format	Date of Comment	Page No.
Agencies				
A1	City of Santa Monica, Planning Division	Email	November 5, 2024	2-2
A2	Department of Conservation, California Geological Survey	Letter via email	November 8, 2024	2-5
A3	Department of Toxic Substances Control	Letter via email	November 8, 2024	2-11
Organizations				
O1	Santa Monica Conservancy	Letter via email	October 31, 2024	2-15
O2	Santa Monica Conservancy	Verbal comment	September 25, 2024	2-20
Individuals				
I1	Mr. Tally, Neighbor	Verbal comment	September 25, 2024	2-21
I2	Mr. Andala, Father to Student and Neighbor	Verbal comment	September 25, 2024	2-23

2.0 COMMENTS AND RESPONSES TO COMMENTS

Email A1, City of Santa Monica, Planning Division, dated November 5, 2024.

From: Rachel Kwok <Rachel.Kwok@santamonica.gov>
Sent: Tuesday, November 5, 2024 4:33 PM
To: Upton, Carey <cupton@smmusd.org>; Jing Yeo <Jing.Yeo@santamonica.gov>
Subject: RE: Two questions for SMMUSD

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

Hi Carey –

A1-1

Thank you for consideration of our comments. My comments are below:

- Page ES-2 The findings were recorded in a Historic Resources Inventory Report (refer to Appendix B.1), which identified a potential historic district consisting of six contributing buildings, five site features, and two additional features eligible for listing in the California Register and for designation as a City of Santa Monica historic district.
- Page 2.0-5 Subsection Title – Recommend changing to Potential Historic District
- Page 3.3-16 under Threshold CUL-1 – I would suggest changing terms used “existing historic district” and “identified historic district” to **potentially eligible historic district**. Per the City’s Landmarks Ordinance Chapter 9.56, “Historic district” is defined as any geographic area or noncontiguous grouping of thematically related properties which the City Council has designated as and determined to be appropriate for historical preservation”. Misuse of the term could imply that the project would be required to comply with the City’s Landmarks Ordinance. The terminology should be corrected throughout the Cultural Resources section.
- Sports field lighting – I didn’t see mention of any new lighting for the sports field. Might want to include analysis or mention of any potential sports field lighting especially since the residential neighbors in the area may be particularly sensitive to it.

A1-2

A1-3

Other than that, I have no further comments. With regard to your question about projections, you can visit our Housing Progress Dashboard (go to the 6th Cycle RHNA tab), and you’ll see how many residential units we have in the pipeline.

A1-4

<https://www.santamonica.gov/topic-explainers/santa-monica-s-housing-progress>

Thanks!
Rachel

A1. Responses to Comments from the City of Santa Monica, Planning Division, dated November 5, 2024.

A1-1 This comment consists of introductory remarks. No response is necessary.

A1-2 This comment pertains to the findings in the Historic Resources Inventory Report, which is provided in the Draft EIR as Appendix B.1 and recommends that the historic district should be characterized as a potentially eligible historic district or "Potential Historic District." The comment states that per the City's Landmarks Ordinance Chapter 9.56, historic districts are designated by the City Council, and characterizing the resources on the campus as an "existing historic district" or "identified historic district" may imply that the Proposed Project would be required to comply with the City's Landmarks Ordinance.

As determined in the Proposed Project's Historic Resources Inventory Report, as provided in Appendix B.1 of the Draft EIR, the Roosevelt Elementary School campus is (1) not listed in, the California Register of Historical Resources (California Register) and has not been determined to be eligible for such listing by the State Historical Resources Commission (i.e., a Mandatory Historical Resource); and (2) is not included in a local register of historical resources and has not been identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code (i.e., a Presumptive Historical Resource). Since neither the campus nor its improvements are a Mandatory or Presumptive Historical Resource, the Proposed Project is not subject to the City of Santa Monica's Landmarks Ordinance.

However, CEQA Guidelines section 15064.5(a)(3) also provides for a Discretionary Historical Resource by stating, "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant...may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record." In this regard, the SMMUSD as the lead agency, has evaluated the buildings and features of the Roosevelt Elementary School campus and considers a portion of the campus to be a historical resource for CEQA purposes. Thus, under CEQA only, the District has determined that a portion of the campus is a Discretionary Historical Resource and has referred to it as a historic district and evaluated the Proposed Project's impact to it. Historic Districts are recognized under all levels of historical resources, not just local jurisdictions, such as the City of Santa Monica. For more detail, see the full evaluation in the Roosevelt Elementary School Historic Resources Inventory Report, as provided in Appendix B.1 of the Draft EIR.

In response to the comment and as shown in Chapter 3 of this Final EIR, the EIR has been revised to clarify that a portion of the school campus is considered to be a historic district for CEQA purposes per the lead agency's discretion. As the revisions are merely to clarify the discussion provided in the Draft EIR, recirculation of a revised Draft EIR is not required. There are no new significant impacts and no increase in the severity of the previously identified significant impacts.

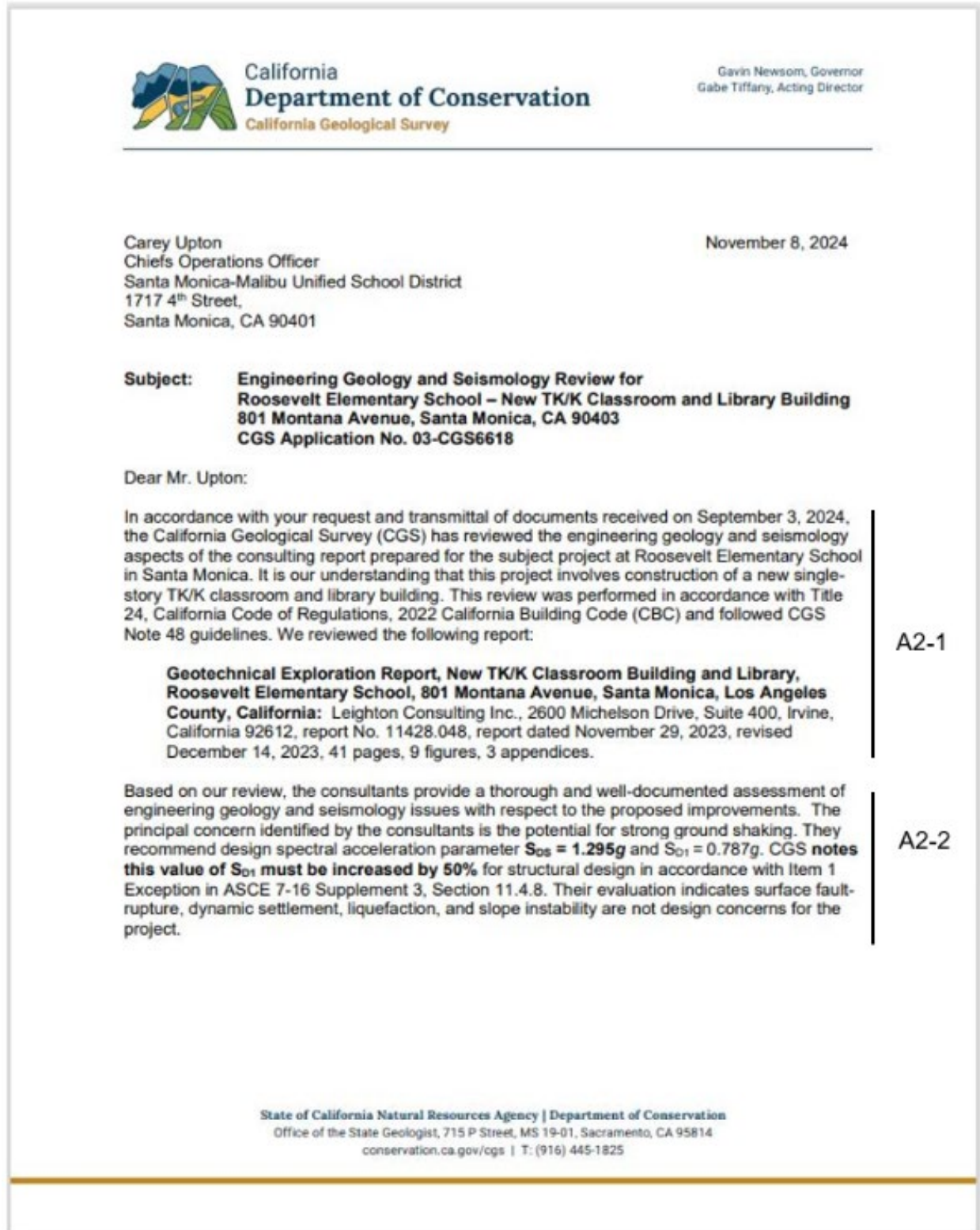
A1-3 This comment states that the EIR does not mention new lighting for the sports field. As described in the EIR Section 2.0, Project Description (Draft EIR pages 2.0-10

2.0 COMMENTS AND RESPONSES TO COMMENTS

to 2.0-12), the existing sports field is located along Alta Avenue and under the Proposed Project, the sports field would be shifted inwards towards the middle of the campus from Alta Avenue and along Lincoln Boulevard. The Proposed Project does not include sports field lighting, as no night sports activities or additional programming are planned as part of the new campus plan.

- A1-4 This comment concludes the City's letter and provides information to the District regarding the City's resources for residential development. This comment is not related to the content or adequacy of the Draft EIR and does not raise a specific environmental issue.

Letter A2, Department of Conservation, California Geological Survey, dated November 8, 2024 (5 pages).



2.0 COMMENTS AND RESPONSES TO COMMENTS

Engineering Geology and Seismology Review
Roosevelt Elementary School – New TK/K Classroom and Library Building
CGS Application No. 03-CGS6618

November 8, 2024

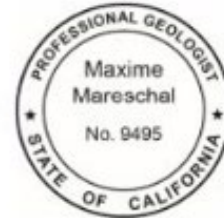
In conclusion, **the engineering geology and seismology issues at this site are adequately assessed in the referenced report, and no further information is requested.** If you have any further questions about this review letter, please contact the primary reviewer at maxime.mareschal@conservation.ca.gov.

A2-3

Respectfully submitted,



Maxime Mareschal
Engineering Geologist
PG 9495



Concur:



Dr. Erik K. Frost
Senior Engineering Geologist
PG 9273, CEG 2704



Enclosures:

Note 48 Checklist Review Comments

Keyed to: *Note 48 - Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings*

Copies to:

Eric M. Holliday, *Certified Engineering Geologist*, and Carl Kim, *Registered Geotechnical Engineer*
Leighton Consulting Inc., 2600 Michelson Drive, Suite 400, Irvine, CA 92612

Jeffery M. Fuller, *Architect*
dsk architects, 1539 Sawtelle Boulevard, Suite 14, Los Angeles, CA 90025

Douglas Humphrey, *Regional Manager*
Division of State Architect, 355 South Grand Avenue, Suite 2100, Los Angeles, CA 90071

Engineering Geology and Seismology Review
Roosevelt Elementary School – New TK/K Classroom and Library Building
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November 8, 2024

Note 48 Checklist Review Comments

In the numbered paragraphs below, this review is keyed to the paragraph numbers of California Geological Survey Note 48 (November 2022 edition), *Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings*.

Project Location

1. Site Location Map, Street Address, County Name: Adequately addressed.
2. Plot Plan with Exploration Data with Building Footprint: Adequately addressed.
3. Site Coordinates: Adequately addressed. Latitude and Longitude provided in report: 34.0283°N, 118.5006°W

Engineering Geology/Site Characterization

4. Regional Geology and Regional Fault Maps: Adequately addressed.
5. Geologic Map of Site: Adequately addressed.
6. Geologic Hazard Zones: Adequately addressed. The consultants report the project site lies outside of CGS Seismic Hazard Zones of Required Investigation for liquefaction and earthquake-induced landslides.
7. Subsurface Geology: Adequately addressed. The consultants report the project site is underlain by 2 to 5 feet of undocumented artificial fill over Quaternary old alluvial fan deposits extending to the maximum depth explored of 51.5 feet below the ground surface (bgs). Groundwater was encountered at a depth of 47 feet bgs during their investigation.
8. Geologic Cross Sections: Adequately addressed.
9. Geotechnical Testing of Representative Samples: Adequately addressed.
10. Consideration of Geology in Geotechnical Engineering Recommendations: Adequately addressed.
11. Conditional Geotechnical Topics: Not applicable.

Seismology & Calculation of Earthquake Ground Motion

12. Evaluation of Historic Seismicity: Adequately addressed. The consultants provide a summary of historical seismicity in the region.
13. Classify the Geologic Subgrade (Site Class): Adequately addressed. The consultants classify the site soil profile as Site Class D, Stiff Soil. This designation appears reasonable based on data provided in the boring logs.
14. General Procedure Seismic Parameters: Adequately addressed. The consultants report the following parameters derived from a map-based analysis:
 $S_S = 1.943g$ and $S_1 = 0.694g$
 $S_{DS} = 1.295g$ and $S_{D1} = 0.787g$
 T_s not reported by the consultants but can be taken as S_{D1}/S_{DS} .
These seismic parameters are acceptable **provided that the value of the parameters S_{M1} and S_{D1} are increased by 50% as required in ASCE 7-16 Supplement 3, Section 11.4.8, Item 1 Exception**. If otherwise, then a site-specific ground motion hazard analysis should be prepared and submitted for CGS review.
15. Site-Specific Ground Motion Analysis: Not applicable.

Engineering Geology and Seismology Review
Roosevelt Elementary School – New TK/K Classroom and Library Building
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November 8, 2024

- 16. Deaggregated Seismic Source Parameters: Not applicable.
- 17. Time-Histories of Earthquake Ground Motion: Not applicable.

Fault Rupture Hazard Evaluation

- 18. Active Faulting & Coseismic Deformation Across Site: Marginally addressed. The consultants report the project site is not located in an Alquist-Priolo Earthquake Fault zone and the nearest zoned fault is the Santa Monica fault located 950 feet to the northwest. The consultant should explicitly assess the potential for surface fault rupture to affect the proposed improvements in future reports.

Liquefaction/Seismic Settlement Analysis

- 19. Geologic Setting for Occurrence of Seismically Induced Liquefaction: Adequately addressed. The consultants report the project site is underlain by medium stiff to hard clays interbedded with medium dense to dense sand, silty sand, and gravel; with groundwater interpreted at depth of 47 feet. They conclude the potential for liquefaction to affect the site is low. The data presented appear to support this conclusion.
- 20. Seismic Settlement Calculations: Adequately addressed. The consultants estimate a potential seismically-induced settlement in the order of ½ inch and a differential settlement of ¼ inch over 30 feet which appear reasonable based on the data provided.
- 21. Other Liquefaction Effects: Not applicable.
- 22. Mitigation Options for Liquefaction: Not applicable.

Slope Stability Analysis

- 23. Geologic Setting for Occurrence of Landslides: Adequately addressed. The consultants report the project site is relatively flat and is not located adjacent to a significant slope. They conclude the potential for seismically induced landslides to affect the site is low. The data presented appear to support this conclusion.
- 24. Determination of Static and Dynamic Strength Parameters: Not applicable.
- 25. Determination of Pseudo-Static Coefficient (K_{eq}): Not applicable.
- 26. Identify Critical Slip Surfaces for Static and Dynamic Analyses: Not applicable.
- 27. Dynamic Site Conditions: Not applicable.
- 28. Mitigation Options/Other Slope Failure: Not applicable.

Other Geologic Hazards or Adverse Site Conditions

- 29. Expansive Soils: Adequately addressed. The consultants report on-site soils have a very low expansion potential.
- 30. Corrosive/Reactive Geochemistry of the Geologic Subgrade: Adequately addressed. The consultants report on-site soils can be characterized as moderately corrosive to buried metal, and present moderate sulfate exposure to buried concrete.
- 31. Conditional Geologic Assessment: Adequately addressed. No significant conditional hazards of potential concern were identified by the consultants.

Engineering Geology and Seismology Review
Roosevelt Elementary School – New TK/K Classroom and Library Building
CGS Application No. 03-CGS6618

November 8, 2024

Report Documentation

- 32. Geology, Seismology, and Geotechnical References: Adequately addressed.
- 33. Certified Engineering Geologist: Adequately addressed.
Eric M. Holliday, Certified Engineering Geologist #2774
- 34. Registered Geotechnical Engineer: Adequately addressed.
Carl Kim, Registered Geotechnical Engineer #2620

2.0 COMMENTS AND RESPONSES TO COMMENTS

A2. Responses to Comments from the Department of Conservation, California Geological Survey, dated November 8, 2024.

- A2-1 This comment introduces the comment letter from the Department and states that the letter pertains to the Department's review of the *Geotechnical Exploration Report, New TK/K Classroom Building and Library, Roosevelt Elementary School, 801 Montana Avenue, Santa Monica, Los Angeles County, California*, prepared by Leighton Consulting, Inc., in accordance with Title 24, California Code of Regulations, 2022 California Building Code, California Geological Society Note 48 guidelines. This report is included as Appendix D.1 of the Draft EIR and provides the technical background of the analysis of geology and soils (Section 3.5) of the Proposed Project. This comment neither identifies a deficiency in the Draft EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.
- A2-2 This comment states that the consultants provided a thorough and well-documented assessment of the engineering geology and seismology conditions for the Proposed Project and summarizes the report findings regarding ground shaking and design spectral acceleration parameter, and references Item 1 Exception in the American Society of Civil Engineers 7-16 Supplement 3, Section 11.4.8. Lastly, this comment states that the evaluation indicates surface fault-rupture, dynamic settlement, liquefaction, and slope instability are not design concerns for the Proposed Project. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.
- A2-3 This comment provides the Department's review conclusions, stating that the engineering geology and seismology issues at the Roosevelt Elementary School campus are adequately assessment and no further information is requested, and closes the comment letter with the contact information for the primary reviewer at the Department and enclosed checklist review comments. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

Letter A3, Department of Toxic Substances Control, dated November 8, 2024 (3 pages).



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

November 08, 2024

Julian Capata
Environmental Programs Director
Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405
jcapata@smmusd.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE ROOSEVELT
ELEMENTARY SCHOOL CAMPUS PLAN PROJECT DATED SEPTEMBER 16, 2024
STATE CLEARINGHOUSE NUMBER [2023090499](#)

Dear Julian Capata,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Roosevelt Elementary School Campus Plan Project (Project). The proposed Project would renovate and modernize the existing Roosevelt Elementary School campus to develop new and updated facilities that would support a project-based learning approach and provide learning opportunities that are flexible, adaptable, and with access to technology and resources. The proposed Project would be constructed in five phases, which would occur at the district's discretion when funding becomes available. Redevelopment and modernization of Roosevelt Elementary School consists of removing and demolishing six buildings and 12 portables, constructing five new buildings and one building addition, renovating four buildings and outdoor play areas, and creating new green spaces for outdoor learning and play in areas that are currently paved over or part of the building footprint on the existing school campus. Additionally, each school entry point would include a security gate to control access. The maximum height of the renovated existing and new

A3-1

2.0 COMMENTS AND RESPONSES TO COMMENTS

Julian Capata
November 8, 2024
Page 2

buildings would not exceed 32 feet. Implementation of the Proposed Project would not increase the capacity of the school and would not change the attendance boundaries.

A3-1,
continued

DTSC recommends and requests consideration of the following comments:

1. A Phase I Environmental Assessment (Phase I) was prepared for an approximately 1.6-acre portion of Roosevelt Elementary School and was submitted to DTSC for review on December 4, 2023. On February 5, 2024, DTSC determined that the 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. On April 19, 2024, the Santa Monica- Malibu Unified School District (District) entered into an Environmental Oversight Agreement (EOA) with DTSC for oversight of preliminary environmental assessment (PEA). If elevated concentrations of hazardous constituents are detected on the school, investigation and cleanup should be conducted under DTSC oversight.

A3-2

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

A3-3

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Julian Capata
November 8, 2024
Page 3

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@opr.ca.gov

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

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

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

2.0 COMMENTS AND RESPONSES TO COMMENTS

A3. Responses to Comments from the Department of Toxic Substances Control, dated November 8, 2024.

A3-1 This comment introduces the comment letter from the Department and states that the letter pertains to the Department's review of the Roosevelt Elementary School Campus Plan Project Draft EIR, and provides a summary of the Proposed Project actions, as described in the Draft EIR Project Description (Section 2.0) and introduces the Department's comment. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

A3-2 This comment states that based on the Phase I Environmental Site Assessment (dated November 17, 2023), which is included as Appendix E of the Draft EIR, DTSC states that if elevated concentrations of hazardous constituents are detected on the school property, investigation and cleanup should be conducted under DTSC oversight, and refers to a Preliminary Environmental Assessment with DTSC.

The Draft EIR addresses hazardous constituents in Section 3.7, Hazards and Hazardous Materials, and identifies mitigation measures (MM): MM HAZ-1 for assessment and abatement of hazardous building materials, including asbestos-containing materials, lead-based paints, and polychlorinated biphenyls, which would be conducted in accordance with federal, state, and local guidelines, including DTSC requirements; MM HAZ-2, which addresses any residual hazardous building materials that may have affected soils, and which would be assessed and removed in accordance with federal, state, and local requirements, including DTSC requirements; and MM HAZ-3, which requires assessment of possible migration of volatile organic compound vapor through the soil from former historic uses near the school, and identifies the appropriate measures to remove or protect against potential contaminated conditions, including but not limited to soil vapor extraction, passive venting and implementation of a membrane with the sub-slab design, installment of other vapor barriers and venting systems, and/or ongoing monitoring.

The District is committed to working with DTSC to ensure that appropriate measures are taken to evaluate and address potential contamination at the school resulting from previous use of hazardous building materials and historic nearby gasoline/automotive and dry-cleaning businesses. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact.

A3-3 This comment concludes the comment letter and provides the contact information for the primary reviewer at the Department with copies to individuals at DTSC and the State Clearinghouse. No response is necessary.

Letter O-1, Santa Monica Conservancy, dated October 31, 2024 (3 pages).



**SANTA MONICA
CONSERVANCY**

P.O. BOX 653
SANTA MONICA, CA 90406
310-496-3146
www.smconservancy.org

October 31, 2024

Carey Upton
Chief Operations Officer, Santa Monica Malibu Unified School District
cupton@smmusd.org

RE: DEIR Review Comments – Roosevelt Elementary School

Thank you for this opportunity to review and comment on the DEIR for Roosevelt Elementary School dated September 2024, prepared for the Santa Monica-Malibu Unified School District Facility Improvement Projects. As representing historic preservation interests in Santa Monica, the Santa Monica Conservancy is pleased to note that this report is comprehensive and complete in its analysis of environmental impacts to historic resources. This analysis is based upon the Historical Resources Inventory Report prepared by Historic Resources Group in 2021 that identifies a potential historic district consisting of six buildings, five site features and two objects.

The DEIR determined that the Proposed Project would result in unavoidable significant adverse impacts to Cultural Resources/Historical Resources that cannot be reduced to a level of insignificance but can be mitigated with mitigation measures. The proposed demolition plan will remove over two-thirds of the historic resources that contribute to the significance and integrity of the identified historic district. This adverse impact is serious and regrettable from a preservation perspective. Of all the SMMUSD recent campus plans that have involved the assessment and identification of potential historic districts, only Roosevelt School has resulted in a project proposal that eliminates an identified historic district.

O1-1

However, the Preferred Plan will retain a meaningful portion of what has been identified as a 1935 campus design that reflects an important movement in educational facilities' design and has been influential for school buildings throughout the region in what was called the "Santa Monica Plan" as identified in the September 6, 2024 Impact Assessment by HRG (pages 28, 29):

"Ultimately, rehabilitation of Building E, Building J, and the South Courtyard will preserve many of the important and influential features characteristic of the original 1935 campus designed by Marsh, Smith & Powell and celebrated as the "Santa Monica Plan." These include two one-story classroom wings with covered, open-air corridors (Building E and Building J) sharing an outdoor courtyard (South Courtyard). Having been restored closer to their original appearance, Building E and Building J would also better reflect their original PWA Moderne architectural style.

Although the preservation of Building E, Building J, and the South Courtyard will not retain enough of the identified contributing elements and character-defining features of the historic district to avoid significant impact under CEQA, the retention and rehabilitation of Building E, Building J, and the South Courtyard will preserve important aspects of the original campus design directly associated with Marsh, Smith & Powell and the PWA Moderne style of architecture. Therefore, the retention and rehabilitation of Building E, Building J, and the South Courtyard would have meaningful historic value as these elements would continue to communicate key tenets of the school's original "Santa Monica Plan" design as it was envisioned by architects Marsh, Smith & Powell."

2.0 COMMENTS AND RESPONSES TO COMMENTS

Roosevelt Elementary School - DEIR Comments 10/31/2024

For this reason, we offer comments on the proposed mitigation measures, the sequence of the proposed five phases of project implementation, and project alternatives to support and promote the recognition of the Roosevelt Campus as an example of the federal Public Works Administration projects and the community's goal to promote safe school buildings after the 1933 Long Beach Earthquake in a manner that included simplicity and beauty of architecture and addressed changing school needs at the time to include indoor and outdoor spaces as emblems of the new "Santa Monica Plan".

O1-1,
continued

Mitigation Measures:

MM CUL-1: We agree that HABS level III documentation is warranted.

O1-2

MM CUL – 2: We agree with the development of an interpretive component that describes the history of Roosevelt School and the influential Santa Monica Plan that was launched by the architects Marsh, Smith and Powell. We would propose strengthening this mitigation measure by adding an element to the school curriculum about this history for school attendees, teachers and Roosevelt School families. As a curriculum element, it will inform the experience of school children and their families as a learning environment that can become a unique and important part of their education.

O1-3

MM CUL – 3: We propose revising and strengthening this mitigation measure regarding an architectural historian. This professional should be an experienced historic preservation architect whose role will be to provide information and guidance for the rehabilitation of Building E, Building J and the South Courtyard, which is consistent with the Secretary of the Interior's Standards. The rehabilitation will include restoration of significant character-defining features of the original buildings to the extent feasible. It's critical to establish a design framework that ensures the quality of the historic rehabilitation component of the project, and to include restoration elements, given the extent of the lost historic resources. Because just a fragment of the original historic district will be retained and rehabilitated, it is even more important to ensure that restoration is part of the rehabilitation program, conveying the significance of Roosevelt School's history and architecture.

O1-4

Project Phasing:

We would respectfully request that the sequence of the five project phases be reconsidered and restructured in order to advance the historic rehabilitation of Building E and j and the South Courtyard, so that this key element is not left to the last phase. We recommend that this component be moved to Phase 2 ½ or Phase 3, after the new classroom building is constructed alongside 9th Street.

O1-5

Project Alternatives

Regarding Project Alternatives, the DEIR does an excellent job describing three historic preservation alternatives in addition to the mandatory no-project alternative. Alternative 3, the Majority Preservation Alternative, accomplishes many of the project objectives while preserving a majority of the historic district. Some of the objections raised in the analysis could be addressed through renovations or expansion of existing facilities. We believe that this Alternative deserves further examination to see how improved educational facilities could be provided while retaining most of the historic resources.

O1-6

Roosevelt Elementary School - DEIR Comments
10/31/2024

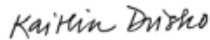
We request that the School Board and SMMUSD staff keep the options described in these alternatives in mind as potential future solutions for Roosevelt School, as this is a long-term project during which time various conditions and scenarios could change and these alternatives may become more relevant, inclusive of retaining the important 1940s WPA-era buildings by another key architect in Santa Monica, Joe M. Estep.

O1-6,
continued

The Santa Monica Conservancy looks forward to working with the Santa Monica Malibu School District to promote understanding of the "Santa Monica Plan" through careful and informed preservation of the original 1935 buildings and sharing this story with the Santa Monica community.

O1-7

Sincerely,



Kaitlin Drisko
Executive Director
Santa Monica Conservancy

2.0 COMMENTS AND RESPONSES TO COMMENTS

O1. Responses to Comments from the Santa Monica Conservancy, dated October 31, 2024 (3 pages).

- O1-1 This comment introduces the comment letter from the Santa Monica Conservancy, states that the Santa Monica Conservancy represents historic preservation interested in Santa Monica, and notes that the Draft EIR is comprehensive and complete in its analysis of environmental impacts to historic resources.

This comment goes on to provide a summary of the Draft EIR cultural and historical resources analysis, including the finding of a significant unavoidable impact resulting from the removal of over two-thirds of the structures considered to be a historic district, but also cites the Historic Resources Technical Report (Appendix B.2 of the Draft EIR), stating that the Proposed Project would retain a meaningful portion of the “Santa Monica Plan.” This comment neither identifies a deficiency in the EIR’s analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

- O1-2 This comment states that the Santa Monica Conservancy agrees with the Historic American Building Survey (HABS) Level III documentation standards identified in the Draft EIR MM CUL-1. No response is necessary.

- O1-3 The commenter expresses agreement with the interpretive component of the Draft EIR MM CUL-2, and further recommends adding an element to the school curriculum about the school history for school attendees, teachers, and Roosevelt school families. As provided in the Draft EIR, MM CUL-2 provides for an interpretive program describing the history of the “Santa Monica Plan” and Roosevelt Elementary School, that would be made accessible to the public. The intent of this mitigation measure is to make information about the history of Roosevelt Elementary School available for interested individuals and organizations. This intent is satisfied with the current requirements of MM CUL-2. Adding an element to the school curriculum would not further reduce the Project’s impact on historical resources pursuant to CEQA. In addition, the educational program at Roosevelt Elementary School is required to follow specific curriculum materials that are beyond the scope of this EIR. However, the District intends to make the interpretive program available in the Roosevelt Elementary School library.

- O1-4 This comment pertains to revising the Draft EIR MM CUL-3, which requires an Architectural Historian who meets the Secretary of the Interior’s Historic Preservation Professional Standards in Historic Architecture to review the proposed campus plan pans for the rehabilitation of Building E, J, and the South Courtyard to ensure the appropriate treatment of the character-defining features consistent with the Secretary of Interior’s Standards of Rehabilitation. The commenter requests that the professional should be an experienced historic preservation architect. In response to this comment, Mitigation Measure MM CUL-3 has been revised to specify an experienced historic preservation architect to provide information and guidance for the rehabilitation activities. The suggested revision to MM CUL-3 would ensure proper mitigation during the rehabilitation of the historic district’s core. As a result, the revision would not cause a potentially

new or exacerbated significant historical resources impact. Thus, no recirculation of a revised Draft EIR is necessary.

- O1-5 This comment requests that the sequence of the project phases be restructured to advance the historic rehabilitation of Building E and J and the South Courtyard. The District will consider the requested phasing activities; however, it is important to note that the sequence of the campus plan phasing is generally determined based on the priority of the needed renovations to meet the District's Educational Specifications, provision of adequate classrooms and learning spaces for the students throughout the new campus plan implementation, and funding availability. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.
- O1-6 This comment pertains to the Draft EIR Alternatives Analysis, and states that Alternative 3, the Majority Preservation Alternative, deserves further examination as it accomplishes many of the project objectives while preserving a majority of the historic district. As addressed in Section 4.0, Alternatives, of the Draft EIR, Alternative 3 does not accomplish the majority of the basic objective classroom and facility building sizes (Draft EIR Table 4-2, Summary of Alternatives' Ability to Meet Basic Objective Classroom and Facility Building Sizes) and meets nearly none of the overall Project Objectives (Draft EIR Table 4-3, Summary of the Alternatives' Ability to Meet Project Objectives). Further, due to the spatial and structural constraints of the school campus, renovations and expansions of the campus recommended by the commenter would not be feasible and would not meaningfully achieve more of the Project Objectives. As disclosed in the Draft EIR and clarified here, the Proposed Project will not cause a new potential or exacerbated significant historical resources impact. If the District decides to carry out the Proposed Project, it will adopt a Statement of Overriding Considerations to explain why the Proposed Project has other substantial benefits that outweigh the significant and unavoidable impact on the historic district.
- O1-7 This comment concludes the comment letter and states the Santa Monica Conservancy looks forward to working with the District. No response is necessary. The District similarly looks forward to continuing its work with the Santa Monica Conservancy.

2.0 COMMENTS AND RESPONSES TO COMMENTS

O2. Responses to Verbal Comments from Kaitlin Drisko, Executive Director of Santa Monica Conservancy, during Public Review/Comment Meeting, September 25, 2024.

- O2-1 The commenter stated that the District team has worked with the Santa Monica Conservancy to address and incorporate historical resources in the campus plan and commends the District team for listening and finding a balance. The commenter states that it is much appreciated that the campus plan retains the historic corridor and courtyards. The commenter wishes that more could be retained but acknowledges the need to implement the District Educational Specifications and appreciates the outdoor areas for the children.

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

I1. Responses to Verbal Comments from Mr. Tally, Neighbor, during Public Review/Comment Meeting, September 25, 2024

- I1-1: Commenter stated that the back of the campus has had 5 to 6 classrooms (portables) since the 1990s, and asks how much time would need to pass before these classrooms would be considered historic?

The approximate threshold generally applied to evaluate structures for historical significance is 50 years. However, the background, context, and nuances to this threshold are important to consider. The 50-year threshold originally comes from 36 Code of Federal Regulations 60.4 and pertains to the National Register. Those regulations require a resource less than 50 years old to be “exceptionally important” to be considered eligible for listing. On the other hand, the California Register criteria (CCR § 4852) state that in order for a resource to achieve significance within the past 50 years, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. The language provided in CCR § 4852, is much broader than the National Register eligibility requirement for exceptional significance. Specifically, the California Register statute allows CEQA lead agencies a fair amount of flexibility in justifying that a resource is significant, even if that resource is less than 50-years old.¹

The buildings and features of the Roosevelt Elementary School campus have been considered collectively for their potential eligibility for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and/or listing at the local level, as analyzed in detail in the Roosevelt Elementary School Historic Resources Inventory Report, as provided in Appendix B.1 of the Draft EIR.

As shown in the EIR and clarified here, the Proposed Project will not cause a potential new or exacerbated significant historical resources impact.

- I1-2: The commenter requests that the eucalyptus trees along Alta Avenue and the trumpet vines along the northeast corner of the campus be saved, as they have been raised by the neighbors.

As described in the Draft EIR Project Description, Section 2, page 2.0-9, the Proposed Project would require removal of 14 existing ornamental, nonnative trees on the school campus, which consist of: seven Queensland pittosporum (*Auranticarpa rhombifolia*); three citrus trees; two Peruvian pepper trees (*Schinus molle*); one camphor tree (*Cinnamomum camphora*); and one carob tree (*Ceratonia siliqua*). It is not anticipated that the eucalyptus trees would be removed. However, with the proposed modernization activities and phases, it is possible that the trumpet vines along the school perimeter may be removed and replaced with updated landscaping. None of the trees are protected species that require mitigation or replacement. The District will continue to work with the public to consider the community needs reasonably balanced with the implementation of

¹ California Office of Historic Preservation. 2015. CEQA and the California Register: Understanding the 50-year Threshold, CEQA Case Studies, Volume V1 September.

2.0 COMMENTS AND RESPONSES TO COMMENTS

the Proposed Project. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, the Proposed Project will not cause a significant impact to protected trees.

- 11-3: The commenter asked whether there will be light spillover for the new parking location and if such light spillover would be mitigated.

The proposed relocated parking lot would be located along Alta Avenue and would be flanked on either side by 9th Street and Lincoln Boulevard. Similar to the existing parking lot, the new parking lot may have sufficient lighting for security purposes. The District would comply with the District's design guidelines and the City's Zoning Code Section 9.21.080(c)(4), which states, "Light Trespass: Lighting may not illuminate other properties in excess of a measurement of 0.5 foot candles of light." Lighting would also be required to meet California Electrical Code and Building Energy Efficiency Standards, which include outdoor lighting fixture design specifications that would prevent spillover onto adjacent properties. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact, and therefore, the Proposed Project will not cause a significant lighting impact.

I2. Responses to Verbal Comments from Mr. Andala, Father to Student and Neighbor, during Public Review/Comment Meeting, September 25, 2024

- I2-1 The commenter asked the probability of the underground parking option to be selected.

The Draft EIR analyzes two possible parking options under Phase 2, which are described in Section 2.0, Project Description of the Draft EIR. The parking design would be largely determined based on the availability of funding, as the underground parking option would entail greater costs than a surface parking lot. This comment neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

- I2-2 The commenter stated that the campus plan is sorely needed and appreciates how bike use was incorporated into the new campus plan. The commenter expressed his general concern for climate change and stated that the campus plan has good tree cover.

As presented in the Draft EIR, the new campus plan facilitates use of outdoor learning areas, which include landscaping and trees. As a general practice, the District tries to preserve existing trees, and if trees are required to be removed during construction, they are replaced with more trees than existing conditions. This comment consists of informational statements and neither identifies a deficiency in the EIR's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

3.1 INTRODUCTION

This section contains revisions to the Draft EIR: to clarify that the SMMUSD considers the Roosevelt Elementary School campus to contain a historic district in their discretion as lead agency pursuant to CEQA Guidelines section 15064.5(a)(3) (in response to Comment A1-2 from the City of Santa Monica Planning Division); and to clarify the roles and responsibilities identified in the Construction Noise Management Plan (MM NOI-1). These revisions are limited to clarifications of the information presented in the Draft EIR and do not introduce a new significant environmental impact, a substantial increase in the severity of an environmental impact, or any other significant new information.

Changes made to the Draft EIR are identified here in ~~strikeout~~ text to indicate deletions and in double underlined text to signify additions.

3.2 DRAFT EIR REVISIONS

The following text has been revised in the Draft EIR.

Section 2.0, Project Description

- Pages 2.0-5 to 2.0-6, Section 2.4.4, Historic District:

2.4.4 Historic District

The original campus was built between 1935 and 2000, and contains nine permanent buildings, as well as athletic facilities, open spaces, and artworks. In 2021, a historic resources evaluation was conducted for the Roosevelt Elementary School campus to identify potential historical resources on the campus. The buildings and features of the Roosevelt Elementary School campus were considered collectively for their potential eligibility for listing in the National Register, the California Register, and/or listing at the local level as a potential historic district. The findings were recorded in a Historic Resources Inventory Report (refer to **Appendix B.1**), which identified a ~~structures~~ considered to be a historic district for purposes of CEQA consisting of (six contributing buildings, five site features, and two additional features) eligible for listing in the California Register and for designation as a City of Santa Monica historic district.

The structures considered to be a historic district ~~was~~were found eligible for listing¹ within the context of the Public Works Administration (PWA) development of school campuses in the post-Long Beach Earthquake years of the 1930s and for its PWA Moderne design by notable architects Marsh, Smith & Powell. Details of the contributing components (six contributing buildings, five site features, and two additional features), ~~of the historic district, which~~ are listed in **Table 2-2**, with photographs of the features shown in **Figure 2-4** and their locations ~~are~~ shown in **Figure 2-5, Historic District Map**.

TABLE 2-2: FEATURES INCLUDED IN THE HISTORIC DISTRICT

Current Feature Name	Year Built	Integrity	Status
Buildings			
Building B	1940	Good	Contributor
Building C	1940	Good	Contributor

3.0 REVISIONS TO THE DRAFT EIR

Building E	1935	Good	Contributor
Building G	1935	Good	Contributor
Building J	1935	Good	Contributor
Portion of Building K	1935	Good	Contributor
Site Features			
Lincoln & Montana Quad	1935	Good	Contributor
South Courtyard	1935	Good	Contributor
North Courtyard	1940	Good	Contributor
Brick Ring	1935	Fair	Contributor
Brick Wall	1935	Fair	Contributor
Additional Features			
"Theodore Roosevelt" Panel	c. 1935	Very Good	Contributor
WPA Bronze Plaque	1940	Very Good	Contributor

The following describes all of the nine onsite buildings and key site features, including the ~~contributing components to the~~ structures considered to be a historic district.

- Page 2.0-6, Footnote:

¹The ~~structures contributing to the~~ historic district ~~was~~ were found to be significant under California Register Criteria 1/3 and City of Santa Monica Criteria 1/4-5.

Section 3.1, Aesthetics

- Page 3.1-4, Visual Setting:

The campus has been identified as containing structures considered to be a historic district under CEQA, consisting of six contributing buildings, five site features, and two additional features, eligible for listing in the California Register of Historical Resources and for designation as a City of Santa Monica historic district (see **Appendix B** for additional discussion). The ~~historic~~ district was found eligible for listing within the context of the PWA development of school campuses in the post-Long Beach earthquake years of the 1930s and for its PWA Moderne design by notable architects Marsh, Smith & Powell; refer also to EIR **Section 2.4.4, Historic District**, which describes each of the contributing elements in detail.

Section 3.3, Cultural Resources

- Page 3.3-4, under **Historic District Assessment**:

The findings were recorded in a Historic Resources Inventory Report (HRG 2022; refer to **Appendix B.1**), which identified structures considered to be a historic district consisting

of six contributing buildings, five site features, and two additional features eligible for listing in the California Register and for designation as a City of Santa Monica historic district.

The ~~historic~~ district was found eligible for listing¹ within the context of the PWA development of school campuses in the post-Long Beach earthquake years of the 1930s and for its PWA Moderne design by notable architects Marsh, Smith, & Powell. Details of the contributing components of the structures considered to be a historic district under CEQA are listed in **Table 3.3-1, Features Included in the Historic District**.

- Page 3.3-5, under **Assessment of Integrity**

As stated, the school campus provides a cohesive concentration of six contributing buildings, five contributing site features, and two contributing additional features that date from the period of significance ~~and have been identified as the~~ that the District considers to be a historic district under CEQA. Such contributing resources within the boundaries of the historic district remain in their original locations on-site. Although the campus was expanded under the auspices of the WPA in 1940, development did not interrupt the generally cohesive grouping of early buildings. Instead, such additions adopted the original design and furthered the original plans for the school as developed by Marsh, Smith, & Powell (HRG 2022). Overall, the integrity of the individual buildings at the school campus is varied; all buildings and features have undergone some degree of alteration from their original form. However, the campus was determined to retain much of the original circulation patterns and spatial relationships established during the period of significance that characterize the historic district as a whole. Overall, the historic district is considered to have retained its integrity of location, design, workmanship, feeling, and association; refer also to **Table 3.1-1, Features Included in the Historic District**. As such, the historic district has retained sufficient integrity to convey its significance as a historic resource at the State and local levels (HRG 2022). Refer to Appendix A of **Appendix B.1** for a detailed assessment of the integrity of the historic district.

- Page 3.3-20, under **Mitigation Measures (Phases 1 through 5)**

MM CUL-3 ~~Architectural Historian~~ Historic Preservation Architect: The Santa Monica-Malibu Unified School District shall retain ~~an architectural historian~~ a licensed, historic preservation architect who meets the Secretary of the Interior's Historic Preservation Professional Standards in Historic Architecture. The ~~architectural historian~~ historic preservation architect shall review the proposed plans for the rehabilitation of Building E, Building J, and the South Courtyard at the Roosevelt Elementary School campus to ensure the appropriate treatment of the significant character-defining features consistent with the Secretary of the Interior's Standards for Rehabilitation; and shall be responsible for overseeing implementation of the identified mitigation measures related to historical resources on behalf of the Santa Monica-Malibu Unified School District.

¹ The historic district was found to be significant under California Register Criteria 1/3 and City of Santa Monica Criteria 1/4-5.

Section 3.8 Noise

- Page 3.8-19, under **MM NOI-1**:

MM NOI-1 The Santa Monica-Malibu Unified School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to, the following measures: :

- The construction contractor shall ensure that power construction equipment (including combustion or electric engines), fixed or mobile, shall be equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of construction of the Proposed Project. The combination of muffling devices and noise shielding shall be capable of reducing noise by at least 5 dBA from non-muffled and shielded noise levels. Prior to initiation of construction, the contractor shall demonstrate to the City District that equipment is properly muffled, shielded, and maintained. All equipment shall be properly maintained to ensure that no additional noise due to worn or improperly maintained parts would be generated.
- The construction noise control plan shall depict the location of construction equipment storage and maintenance areas, and document methods to be employed to minimize noise impacts on adjacent noise-sensitive land uses.
- At least 15 days prior to commencement of construction, the ~~District contractor~~ shall send notice regarding the Project construction schedule to property owners and occupants located within 500 feet of the Proposed Project grading limits. A sign, visible to the public, shall also be posted at the construction site. All notices and signs shall be reviewed and approved by the ~~City of Santa Monica Public Works Department~~ District prior to mailing or posting and shall indicate the dates and duration of construction activities and provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.
- The construction contractor shall provide evidence that a construction staff member is designated as a Noise Disturbance Coordinator who shall be present on-site during construction activities. The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the ~~City of Santa Monica Public Works Department~~ District. All notices that are sent to residential units immediately surrounding the construction site

and all signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator.

- The Proposed Project ~~applicant~~ contractor shall demonstrate to the satisfaction of the ~~City of Santa Monica Public Works Department District~~ that construction noise reduction methods shall be used, including but not limited to, shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and the use of electric air compressors and similar power tools, to the extent feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.
- To the extent feasible, haul routes shall be designed such that the routes do not pass sensitive land uses or residential dwellings.
- In compliance with Santa Monica Municipal Code Section 4.12.110 and the permit exemption, construction activities and haul truck deliveries shall only occur between the hours of ~~8~~7:00 AM to 6:00 PM on Mondays through Fridays and 9:00 AM to 5:00 PM on Saturdays unless otherwise authorized. Construction activities shall be prohibited on Sundays and holidays, unless otherwise authorized.

Section 4.0, Alternatives

- Page 4.0-3, under **Significant and Unavoidable Impacts:**

The analysis of the Proposed Project in this EIR has identified one significant and unavoidable impact pertaining to the demolition of four buildings that are contributors to the ~~historic district~~ considered by the SMMUSD to be historic district for the purposes of CEQA.

3.0 REVISIONS TO THE DRAFT EIR

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