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

Appendices

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January 2023 | Initial Study

GRANT ELEMENTARY SCHOOL CAMPUS MASTER PLAN PROJECT

Santa Monica–Malibu Unified School District

Prepared for:

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

Prepared by:

PlaceWorks
Contact: Arabesque Said-Abdelwahed, Senior Associate
700 S. Flower Street, Suite 600
Los Angeles, California 90017
213.623.1443
info@placeworks.com
www.placeworks.com

PLACEWORKS

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Abbreviations and Acronyms

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

Abbreviations and Acronyms

gpf	gallons per flush
GSP	groundwater sustainability plan
HREC	historic recognized environmental condition
HRI	historic resources inventory
HTP	Hyperion Wastewater Treatment Plant
HVAC	heating, ventilating, and air conditioning system
LACoFD	Los Angeles County Fire Department
L_{eq}	equivalent continuous noise level
LCP	local coastal plan
LID	low impact development
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MMRP	mitigation monitoring and reporting program
MND	mitigated negative declaration
MRZ	mineral resource zone
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
ND	negative declaration
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NWI	National Wetlands Inventory
O_3	ozone
OEM	Office Emergency Management
OPR	Office of Planning and Research
PCB	polychlorinated biphenyl
PCH	Pacific Coast Highway
PM	particulate matter
PRC	Public Resources Code
PRD	Permit Registration Documents
PV	photovoltaic
PWA	Public Works Administration

Abbreviations and Acronyms

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

1. Introduction

1.1 OVERVIEW

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

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

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

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

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

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

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

1.3 INITIAL STUDY

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

1.4 IMPACT TERMINOLOGY

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

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

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

1.5 ORGANIZATION OF THE INITIAL STUDY

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

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

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

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

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

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

1. Introduction

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

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

2. Environmental Setting

2.1 PROJECT LOCATION

The Grant ES campus (Project Site) is located at 2368 Pearl Street (Assessor's Parcel Map Numbers [APN] 4273-009-900) in the Sunset Park neighborhood of the city of Santa Monica, Los Angeles County, California (see Figure 1, *Regional Location*). The campus consists of a 6.01-acre rectangular parcel that includes the existing campus and is entirely District-owned. The campus is approximately 0.5-mile south of Interstate 10 (I-10), two miles east of the Pacific Coast Highway (PCH) and Santa Monica State Beach. Grant ES is in an urban area surrounded by residential neighborhoods, bounded by Pearl Street to the north, residences across 24th Court (alley) to the east, residences across Pearl Place South (alley) to the west, and a residential neighborhood immediately to the south (Figure 2, *Aerial Photograph*). Direct access to the campus is provided by Pearl Street, with student drop-off/pick-up occurring along Pearl Street.

2.2 SURROUNDING LAND USES

Grant ES is surrounded by low-density single-family residential neighborhoods. The properties surrounding the campus are zoned Single-Family Residential. Multifamily residential properties are located a half block south of the campus along Ocean Park Boulevard, which are zoned medium-density residential (Santa Monica 2015).

The surrounding residential neighborhood streets include Pearl Street, an alley called Pearl Place, another alley called 24th Court, and 24th Street. Major roadways, Pico Boulevard to the north and Ocean Park Boulevard to the south, are each one block from the campus. Clover Park is about 0.15-mile southeast of the campus.

2.3 GENERAL PLAN AND EXISTING ZONING

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

2.4 EXISTING CONDITIONS

Originally built in 1936, Grant ES serves students from preschool, transitional kindergarten, kindergarten, and grades one through five. The campus contains four permanent classroom buildings, an administration/classroom building, an auditorium building, a library, a computer lab/classrooms building, a cafeteria/classrooms building, and eight modular and relocatable buildings (see Table 1, *Characteristics of Existing Buildings*). These buildings are concentrated in the northern portion of the campus nearest Pearl Street, and along its west and east perimeters. They are organized around a network of courtyards (see Figure 4, *Existing Site Plan*, and Figure 5, *Photographs of the Existing Campus*).

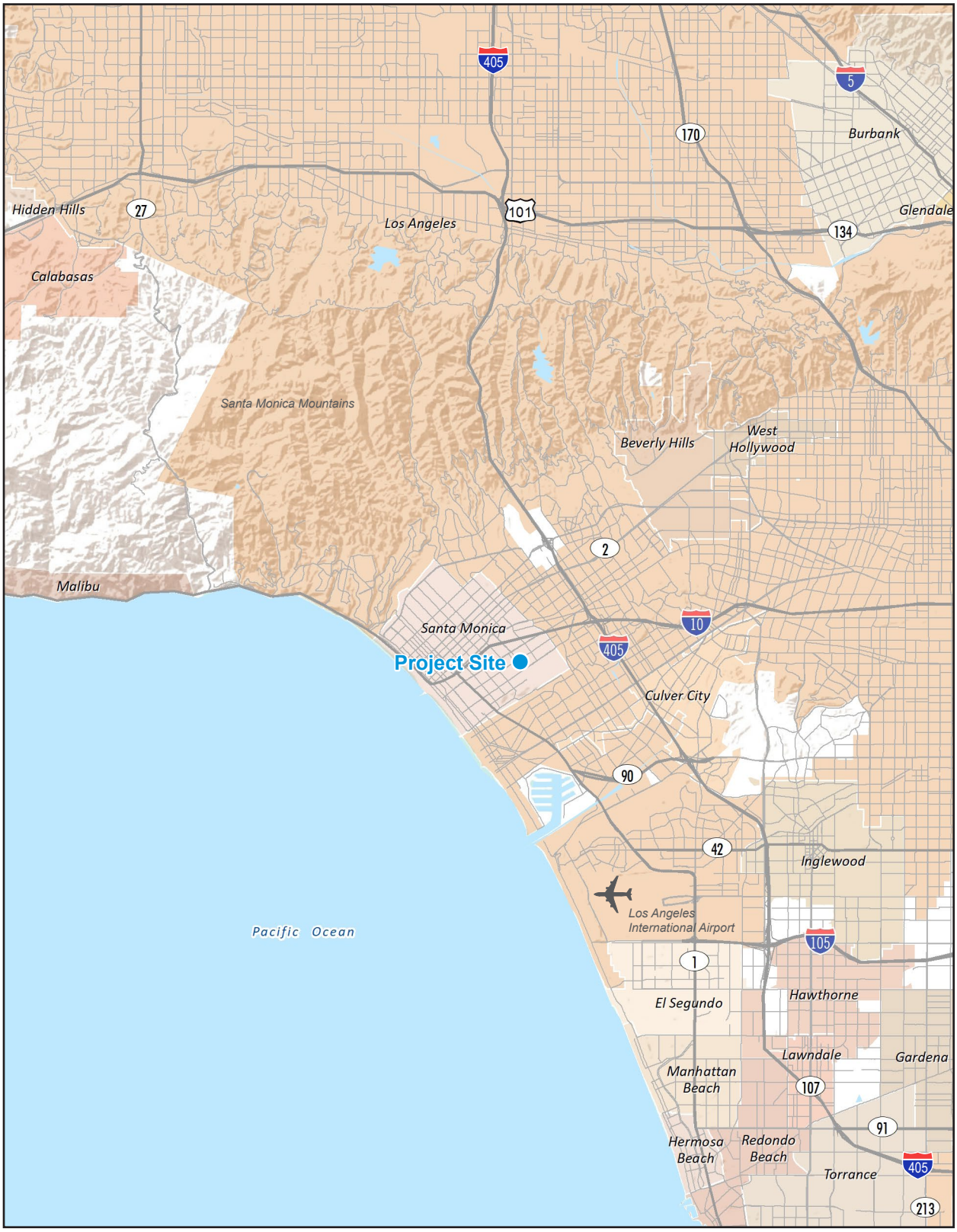
Table 1 Characteristics of Existing Buildings

Building Name	Year Built	Current Use	Building Square Feet	Building Type	Building Height	Number of Stories
A	1954	Classrooms	4,415	Permanent	12 ft-1 in	1
B	1940; 1954	Classrooms	6,830	Permanent	16 ft-2 in (Original) 12 ft-1 in (addition)	1
C	1936	Classrooms	5,815	Permanent	16 ft-2 in	1
D	1936	Admin/Classrooms	5,110	Permanent	30 ft-7 in	1
E	1945	Auditorium	5,105	Permanent	22 ft-8 in	1/2
F	1968	Library	3,125	Permanent	15 ft	1
G	1940	Computer Lab/Classrooms	2,830	Permanent	16 ft-2 in	1
H	1945	Cafeteria/Classrooms	13,965	Permanent	20 ft	1
K	1945	Admin/Classrooms	3,370	Permanent	18 ft-6 in	1
P70 – P75	1992	Classrooms	5,760	Modular	-	1
P76 – P79	1999	Classrooms	3,860	Modular	-	1

Source: Architectural Resources Group 2022.

The primary entrance to the campus includes a forecourt comprising dual concrete walkways and concrete steps that lead to the building entrance. This space also contains low concrete buffer walls and planters, and metal gates that restrict access to the site. To the east of the forecourt is a surface parking lot with 14 parking stalls that is accessed via Pearl Street. There are buffer plantings around the perimeter of the parking lot. The southern portion of the campus has open space for school recreation. Much of this space consists of an approximately 74,000-square-foot paved asphalt surface that is used for basketball and athletic courts and contains several shade structures. There is also playground equipment installed on artificial turf and a raised-bed garden enclosed by a low wood picket fence. The southwest corner of the campus contains a broad lawn. Bleachers are installed adjacent to the south edge of the lawn. Beyond that, at the far south end of the campus, is a 5,662-square-foot surface parking lot for staff with 48 parking stalls that is accessed from the south, via 24th Street. The parking lot is enclosed by chain-link fencing, which restricts access to both the parking lot and the school campus. The west and east perimeters of the campus are enclosed by chain-link fencing.

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap, 2022.

0 3
Scale (Miles)

PlaceWorks

2. Environmental Setting

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Figure 2 - Aerial Photograph

Grant ES Campus Boundary

0 200
Scale (Feet)

Source: Nearmap, Inc., 2022.

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2. Environmental Setting

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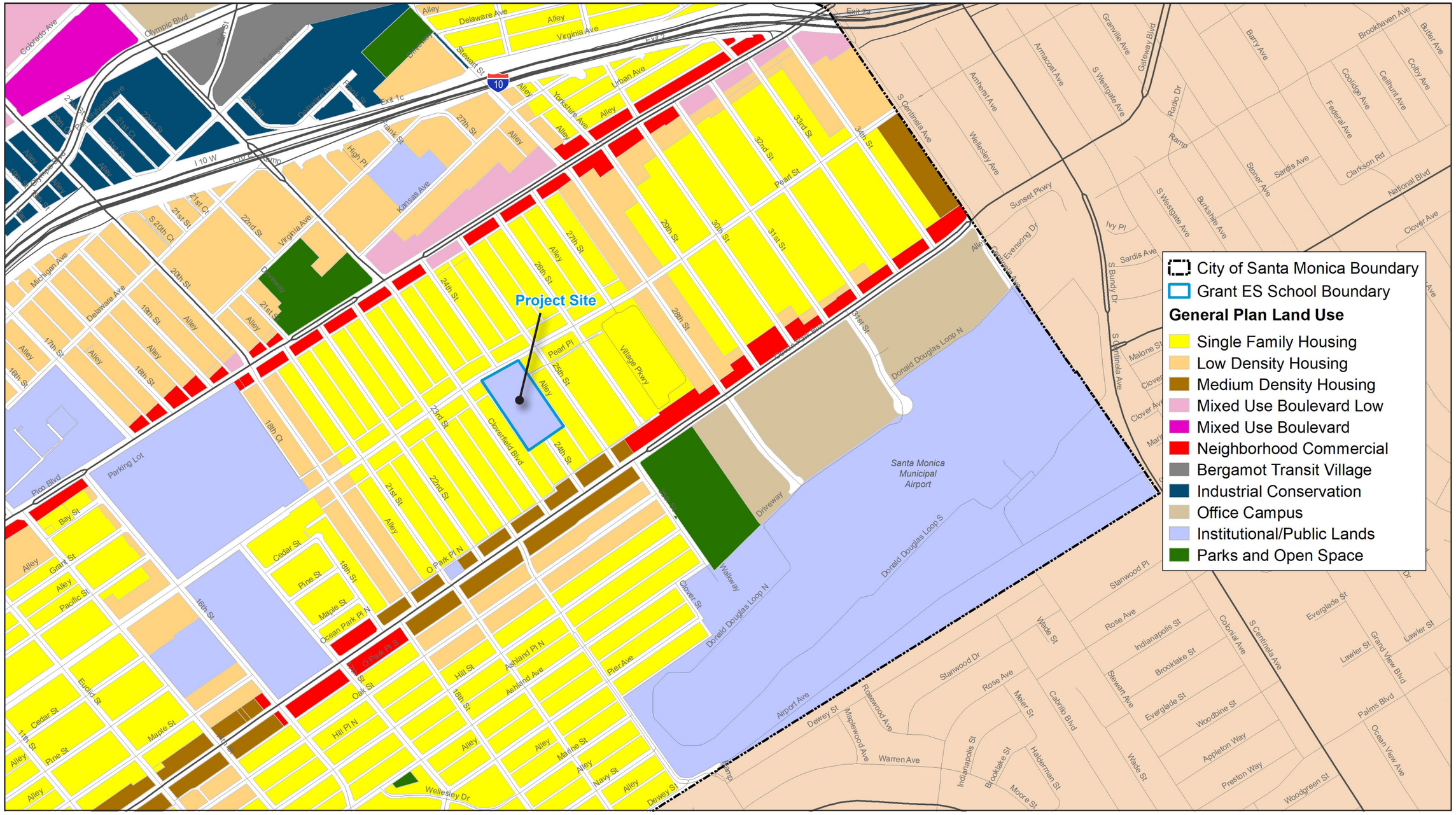
Figure 3a - General Plan Land Use



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

2. Environmental Setting

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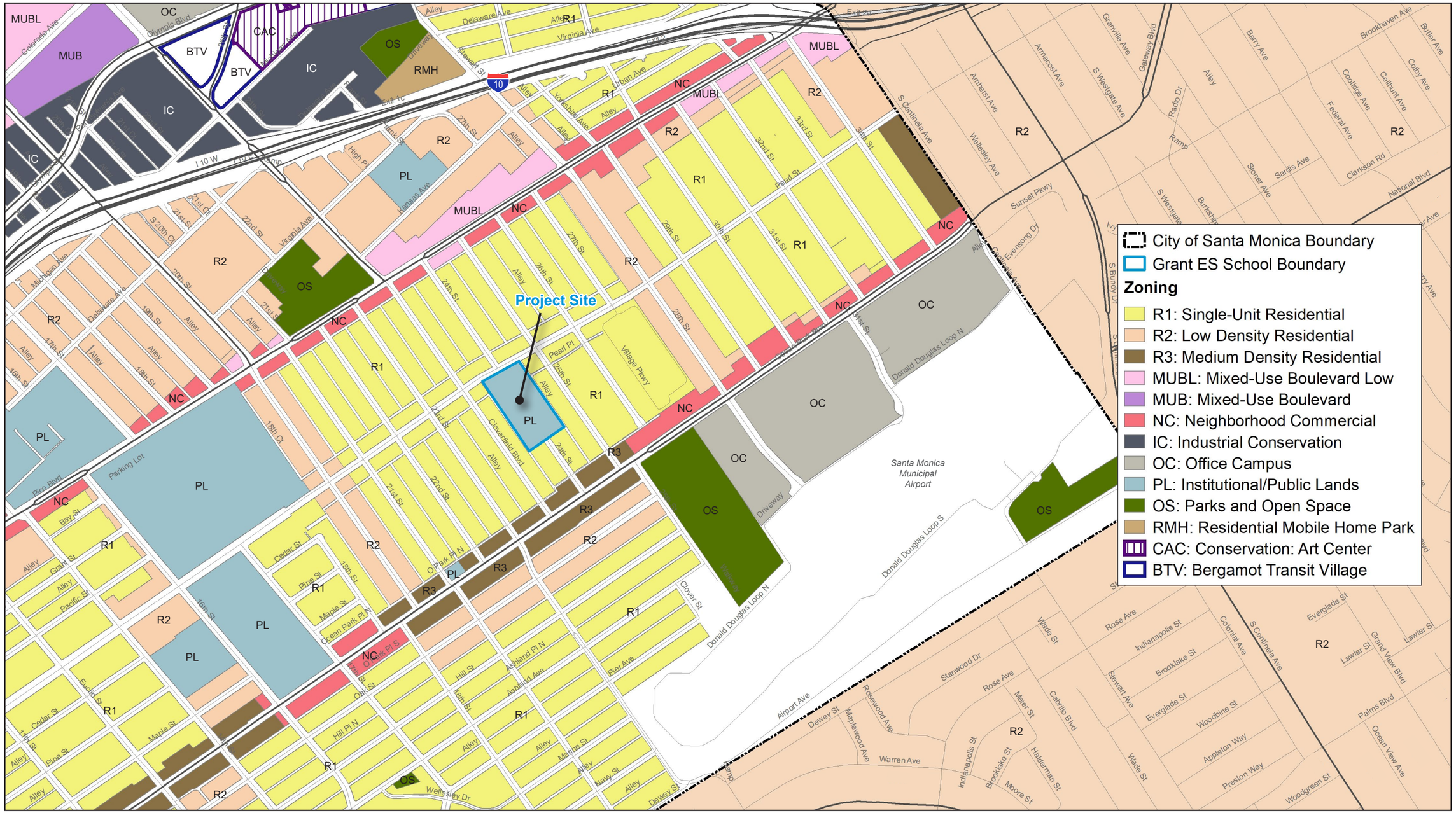
Figure 3b - Zoning Designations



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

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2. Environmental Setting

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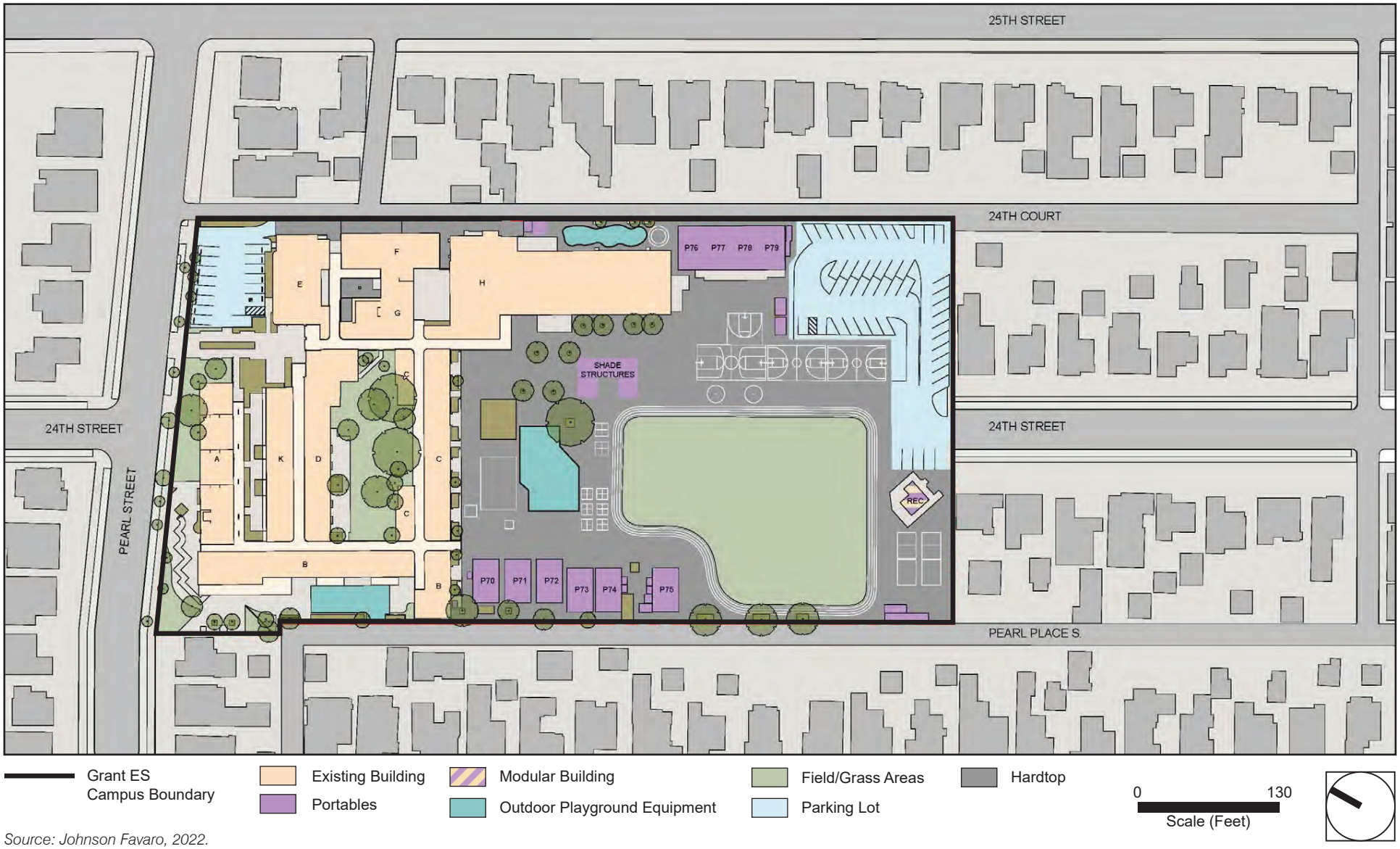
Figure 4 - Existing Site Plan



Source: Johnson Favaro, 2022.

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2. Environmental Setting

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Figure 5 - Photos of the Existing Campus

Source: SMMUSD, 2022.

2. Environmental Setting

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The campus contains nine permanent buildings (named A-H) and multiple modular and portable buildings. The permanent buildings are stylistically similar – though not identical – and exhibit characteristics of the Public Works Administration (PWA) Moderne and Mid-Century Modern styles. The following sections include an architectural description of each building.

Building A (Classrooms)

Building A is a one-story building, constructed in 1954. This building is approximately 4,415-square feet, with a height of 12 feet-1 inch, and is designed in the Mid-Century Modern style with a long, narrow rectangular plan. This building is located along the northern perimeter of the campus and contains classrooms.

Building B (Classrooms)

Building B is located on the western perimeter of the campus and is connected to Buildings A, C, D, and K by a network of semi-enclosed corridors. Building B was constructed in 1940 and expanded in 1954. It is one story, 6,830-square foot building that contains classrooms, designed in the PWA Moderne style. The original building is 16 feet-2 inches in height, and the addition to the building is 12 feet-1 inch in height.

Building C (Classrooms)

Building C (along with Building H) anchors the south end of the campus's complex of permanent buildings, and is connected to Buildings B, G, and H by a network of semi-enclosed corridors. Building C was constructed in 1936 and is used as classrooms. It is designed in the PWA Moderne style and is one story, and approximately 5,815 square feet with a height of 16 feet-2 inches. Most of the building consists of a rectangular footprint; however, there are two small volumes that project from the north end of the building and provide with a U-shaped footprint when viewed in plan.

Building D (Administration/Classrooms)

Building D is located near the center of the campus's complex of permanent buildings, and is connected to Buildings B, C, E, G, and K by a network of semi-enclosed corridors. It is prominently visible from the north, along Pearl Street. Building D is approximately 5,110 square feet with a height of 30 feet-7 inches and was constructed in 1936 and contains administrative offices and classrooms. It is designed in the PWA Moderne style, has both one and two-story volumes, and is L-shaped in plan.

Building E (Auditorium)

Building E is located at the northeast corner of the campus, and is connected to Buildings D, F, and G by a network of semi-enclosed corridors. Building E is approximately 5,105 square feet with a height of 22 feet-8 inches and was constructed in 1945 and is used as an auditorium. It is designed in the PWA Moderne style, is one story tall, is irregular in plan, and is visible from Pearl Street.

Building F (Library)

Building F is located to the south of Building E. It is connected to Building E by a semi-exterior corridor, and is directly appended to the east façade of Building G. The building was constructed in 1965 as an addition to

Building G, and is used as a library. It is one story, 3,125 square-foot building with a height of 15 feet, and rectangular in plan, and is designed in the Mid-Century Modern style.

Building G (Computer Lab/Classrooms)

Building G is also located to the rear (south) of Building E. It is connected to Building E by a semi-exterior corridor, and is directly appended to the west façade of Building F. This building was constructed in 1940 and is used as a computer lab and classrooms. It is one story, 2,830 square foot building with a height of 16 feet-2 inches, roughly L-shaped in plan, and is designed in the PWA Moderne style.

Building H (Cafeteria/Classrooms)

Building H (along with Building C) anchors the south end of the campus's complex of permanent buildings and flanks its east perimeter. It is connected to Buildings F, G, and C by a network of semi-enclosed corridors. This building was constructed in 1945 and houses a cafeteria and classrooms. It is designed in the PWA Moderne style, is one story, 13,965 square foot building with a height of 20 feet and has an irregular footprint.

Building K (Classrooms)

Building K is located near the front (north) of the campus, between Buildings A and D. It is connected to Building D by a semi-enclosed corridor. This building was constructed in 1945 and is used as classrooms. It is designed in the PWA Moderne style, is one story, 3,370 square foot building with a height of 18 feet-6 inches, and has a long, narrow rectangular plan.

Modular, Relocatable, and Ancillary Buildings

The campus also contains several modular and relocatable buildings that have been installed at various points to accommodate growth and campus needs. These buildings are located to the south of the permanent buildings described above, along the east and west perimeters of the campus. Specifically, there are six relocatable buildings flanking the west edge of campus (named P70-P75), and four modular buildings flanking its eastern edge (named P76-P79), all of which are used as classrooms.

2.4.2 Student Enrollment

Enrollment at Grant ES has been steadily decreasing since 2013, from a high of approximately 665 students to 582 in the 2018-2019 school year. In the 2021-2022 school year, enrollment further declined to 543 students, and in the 2022-2023 school year, enrollment increased to 550 students (see Table 2, *Grant Elementary School Student Enrollment by Grade Level*).

The Grant ES student capacity is based on California Department of Education standards that assesses the current capacity at a maximum enrollment of 915 students. This is a maximum where space is used as a classroom and is full of students. Based on the classroom maximums negotiated in the current collective bargaining agreement with the Santa Monica-Malibu Classroom Teachers Association, the maximum enrollment capacity at Grant ES is 809 students. However, neither of these maximum capacity numbers are reflective of the way instruction currently occurs nor is anticipated to occur based on actual enrollment trends.

Based on the Districtwide Educational Specifications, the current campus could support up to a maximum of 675 students. The Proposed Project would not increase the capacity of the campus capacity but would be designed to support the District's goals and objectives outlined in the Districtwide Education Specifications (SMMUSD 2019) contained within the 2019 SMMUSD Education Master Plan.

Table 2 Grant Elementary School Student Enrollment by Grade Level

Grade	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Transitional Kindergarten	Data Not Available	Data Not Available	Data Not Available	16	22	19	17	18	14	32
Kindergarten	93	93	93	102	95	89	92	78	75	73
1st Grade	105	90	95	90	101	96	91	88	88	83
2nd Grade	118	107	96	91	93	99	101	87	86	90
3rd Grade	110	119	117	96	85	92	104	92	90	92
4th Grade	115	111	116	114	98	83	91	101	85	100
5th Grade	124	115	111	116	114	94	86	93	105	80
Total	**665**	**635**	**628**	**625**	**608**	**572**	**582**	**557**	**543**	**550**

Source: SMMUSD CBEDS 2006-2022

2.4.3 School Schedule

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

2.4.4 Existing Grant ES Campus Uses

The campus encompasses approximately 6.01 acres, with a total existing building area of 60,585 square feet, which includes approximately 50,965 square feet of permanent building area and 9,620 square feet of relocatable building area.

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

2. Environmental Setting

Table 3 Existing Facilities

Campus Facilities	Quantity
Preschool	1
Transitional Kindergarten	1
Kindergarten	4
1st Grade	4
2nd Grade	4
3rd Grade	4
4th Grade	3
5th Grade	3
Special Education	5
Core Classrooms	**29**
Before/Afterschool Programs	3
Science	1
Art	2
Music	1
Multipurpose Auditorium	1
Multipurpose Cafeteria/Kitchen	1
Library	1
Specialized/Flexible Rooms	**10**

Source: SMMUSD 2023

The campus also includes student gathering areas, athletic fields, and parking areas, as shown in Table 4, *Existing Outdoor Facilities*.

Table 4 Existing Outdoor Facilities

Area	Acres	Percentage
Building Footprint	1.39	23
Playground and Fields	2.80	47
Unprogrammed Landscape and Open Space	0.63	10
Pedestrian Circulation	0.53	9
Vehicular Circulation and Parking	0.66	11
Total	**6.01**	**100**

Source: SMMUSD 2023

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

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

2.5 CAMPUS HISTORY

The original campus was constructed in 1905 about one-half-mile northwest of its present-day location. The school originally consisted of a one-room schoolhouse at 22nd Street and Virginia Avenue. A new, four-room school building was constructed at the original Grant School location in 1906. In 1924, the Grant School campus was expanded amid an increase in student enrollment. In 1936, the District elected to move the Grant School about one-half mile southeast of the original campus to its present-day location. The permanent buildings on the Grant ES campus were constructed between 1936 and 1965. The campus development commenced under the auspices of the federal Works Progress Administration and continued through the early postwar era (1945-1968), a period of growth in Santa Monica. As shown in Table 1, *Characteristics of Existing Buildings*, Buildings B though E and G through K were constructed in the 1930s and 1940s; Buildings A and F, and portions of Building B were constructed in the 1950's and 1960's; and additional portable classrooms were constructed on the campus in the 1990's.

The campus includes nine permanent buildings generally designed in the PWA Moderne and Mid-Century Modern styles of architecture, consistent with the eras in which they were built (see Table 1). Buildings at the campus include four classroom buildings, an administration/classroom building, an auditorium building, a library, a computer lab/classrooms building, a cafeteria/classrooms building, and eight modular and relocatable buildings (see Figure 4 and Figure 5).

2.5.1 Historical Resources

In February 2021, the District adopted Board Policy (BP) 7113 and the accompanying Administrative Regulation (AR) 7113, which were developed to identify and clarify treatment of historical resources present on properties within the District's jurisdiction. The Board Policy and Administrative Regulation require completion of a historic resources inventory (HRI) of a school campus prior to approval of either a master plan or design of a school facilities project at that campus. In 2022, the District commissioned an HRI of the Grant ES campus. The purpose of the HRI is to determine whether there are historical resources present at Grant ES, and if so, to identify character-defining features and spaces to aid in matters related to site planning and facilities management at the campus moving forward. The campus HRI was prepared in conformance with BP and AD 7113 as they relate to Grant ES.

Based on review of background materials, primary and secondary source research, public outreach, and development of appliable historic contexts and themes, the HRI concluded that a portion of the Grant ES campus appears eligible for listing in the California Register of Historical Resources under Criteria 1 and 3, and for local (City of Santa Monica) listing under Criteria 1, 4, and 5 as a historic district comprising multiple buildings and associated site/landscape features (see Table 5, *Features in the Historic District* and Figure 6, *Historic*

2. Environmental Setting

District Boundary).[1] Significance is derived from the synergy between contributing buildings and site features; no one building or site feature on the campus appears to be individually eligible when evaluated independent of the larger historic district. Buildings B, C, D, E, G, and H; the landscaped courtyard bounded by Buildings B, C, D, and G; and the paved forecourt and flagpole at the north end of the campus as approached from Pearl Street are contributing elements of the historic district; however, other buildings and site/landscape features do not contribute to the historic district. Grant ES does not appear eligible for listing in the National Register of Historic Places due to compromised integrity (Architectural Resources Group 2022). The historic district is further discussed in Section 5.4, Cultural Resources, below. The SMMUSD Board of Education (Board) was presented the HRIs during the February 7, 2022 Board meeting. The Board provided direction to proceed with the campus plans and to proceed with the design of the first phase of the Proposed Project (SMMUSD 2023).

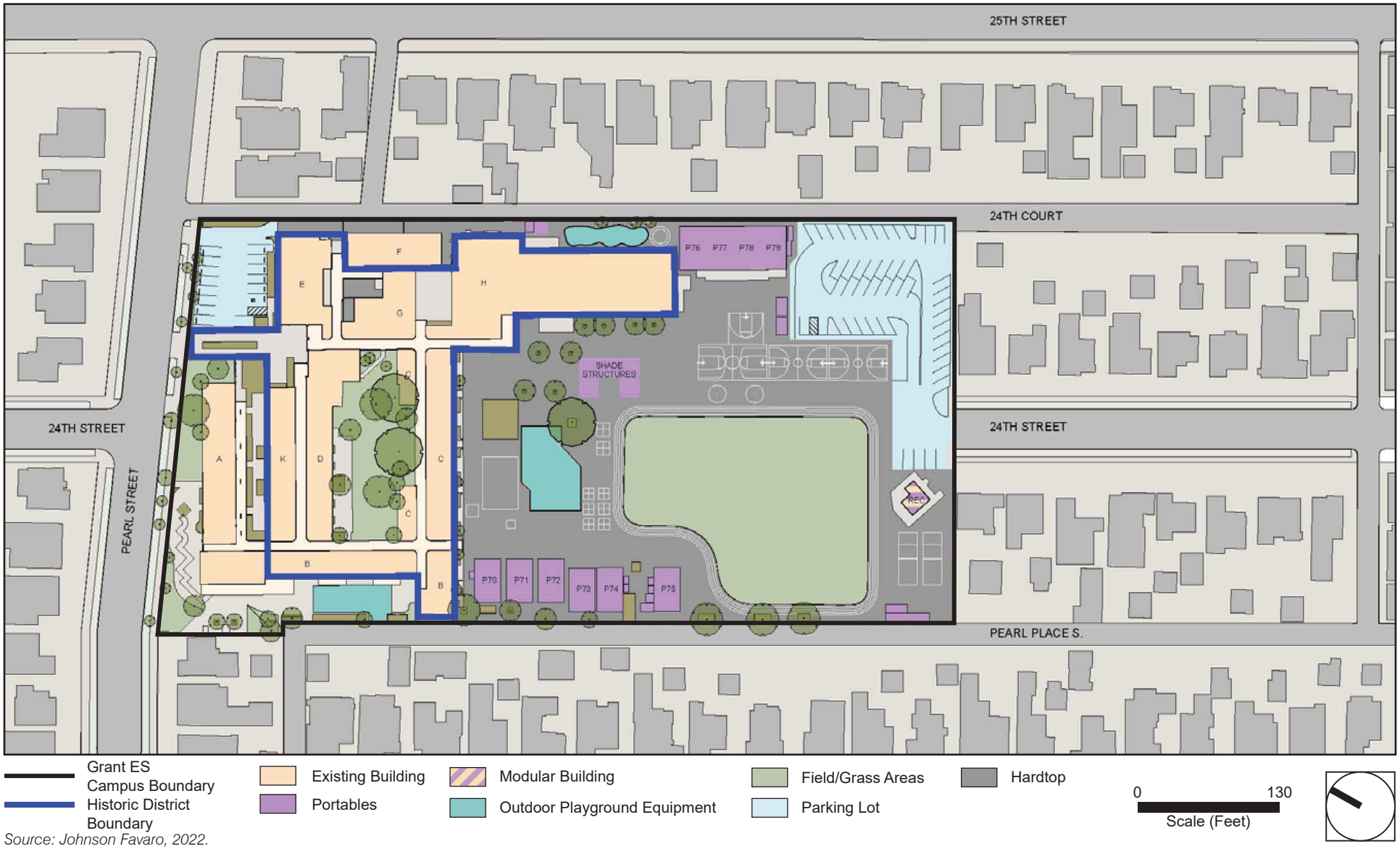
Table 5 Features in the Historic District

Current Feature Name	Year Built	Status	Building Style
Buildings			
Building B	1940; 1954	Contributor	PWA Moderne
Building C	1936	Contributor	PWA Moderne
Building D	1936	Contributor	PWA Moderne
Building E	1945	Contributor	PWA Moderne
Building G	1940	Contributor	PWA Moderne
Site Features			
Landscaped courtyard bounded by Buildings B, C, D, and G	1936	Contributor	N/A
Main Courtyard	Unknown	Contributor	N/A
Additional Features			
Paved forecourt and flagpole at the north end of the campus	Unknown	Contributor	N/A

Source: Architectural Resources Group 2022.

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

Figure 6 - Historic District Boundary



Source: Johnson Favaro, 2022.

PlaceWorks

2. Environmental Setting

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3. Project Description

3.1 PROPOSED PROJECT DEVELOPMENT

The Proposed Project, which involves implementation of a Campus Master Plan, would be constructed in three phases and would occur over 5.41 acres of the 6.01-acre District-owned campus. Redevelopment and modernization of Grant ES includes the demolition and removal of some existing structures, renovation of structures to remain, construction of two new buildings, new and reconfigured playfields and playgrounds, and two new and reconfigured parking lots. As listed in Table 6, *Summary of Building Removal and Demolition*, 10 existing modular classrooms (P70 through P79), playground restrooms, shade structures, and a portion of one permanent building (Building B) would be selectively demolished and removed as part of the Proposed Project, totaling approximately 55,445 square feet of demolition. Figures 7a through 7c, *Proposed Project's Site Plan*, shows ultimate buildout for each phase of the Proposed Project.

Table 6 Summary of Building Removal and Demolition

Name	Square Footage
Phase 1	
Library Renovation and Expansion	N/A
Transitional Kindergarten and Kindergarten Classroom Renovation	N/A
Central Garden Improvements	N/A
Phase 2	
Six Portable Classrooms (P70-P75)	34,560 (5,760 sq. ft. x 6)
Playground Restrooms	400
Shade Structures	1,500 sf
Phase 3	
Four Portable Classrooms (P76-P79)	15,440 (3,860 sq. ft. x 4)
Building B – One Kindergarten Classroom	1,810
Building B – One Special Education Classroom	1,735
Total Demolition Square Footage	**55,445**

Source: SMMUSD 2022.

Phase 1

Phase 1 of the Proposed Project would include renovation and expansion of the existing library (Building H), renovation of the transitional kindergarten and kindergarten classrooms (Building A), and improvement to the central garden. The existing 3,190-square-foot library would be expanded and renovated to add 250 square feet of space to the west of the existing library within a currently paved area. Buildings G and F would be combined by removing the eastern wall of Building G and western wall of Building F, to create the new Library and

3. Project Description

Maker space and would total approximately 5,955 square feet of development. Phase 1 would not require any building demolition (see Figure 7a, *Proposed Project's Site Plan – Phase 1*).

The interior main space for the library would be articulated into small-group and individual spaces, and physical and layout space for research, and one-on-one encounters would be included. The expanded library would include multipurpose and collaborative areas set-up for presentations. The library would accommodate 50 to 60 students, and would provide sitting and standing positions for staff, with visibility and clear lines of sight. The library renovations would create a functional space and would not increase or decrease physical capacity.

Interior and exterior door frames would be added and replaced with wider steel-frame openings with fixed glass and sliding doors to allow access to outdoor gardens and classrooms. The renovations would reconfigure the existing library to allow space for a new study room, new outdoor classroom, collaborative maker spaces, maker space storage, new reader tables and seats, early childhood story time area, new readers seats, and a new multipurpose room.

The new dedicated maker space would be areas to create projects or crafts based on students' interests or things they are currently studying in class. This area would be a high-use hub of activity centrally located and accessible during lunch and after school.

The existing early childhood education classrooms currently in Building H would be consolidated into new transitional kindergarten classrooms within Building A. The four existing elementary classrooms in Building A would be consolidated into three early education classrooms (two Pre-K classrooms and one transitional kindergarten classroom), separated by restrooms and works. Each classroom would include new vertically retracting doors that would lead to new outdoor classrooms and a new transitional kindergarten play yard located directly north of the building. This component of the Proposed Project would be limited to interior renovations and Building A would not be expanded.

Phase 2

Phase 2 of the Proposed Project would require approximately 36,460 square feet of demolition, which would be limited to the removal of six portable classrooms (P70-P75), playground restrooms, and shade structures. Phase 2 of the Proposed Project would include the construction of a new permanent 10,626-square-foot one-story classroom building with six elementary classrooms and a new 23,645-square-foot, two-story transitional kindergarten, kindergarten, and elementary classroom building. The new building would be 34 feet in height at the parapet. The existing classrooms within the modular buildings (P70-P75) and classrooms within Building B would be relocated to this new building.

Transitional kindergarten and kindergarten areas would be on the ground floor, and similar to the existing classrooms, each new classroom would have the capacity for 20 students in transitional kindergarten; 24 students in kindergarten; one instructor; and one aide/volunteer. First- and second-grade classrooms would have the capacity for 24 students, one instructor, one aide/volunteer, one guest speaker or co-learning instruction, and special education aides.

Figure 7a - Proposed Project Site Plan - Phase 1

Grant ES Campus Boundary
Existing Building
Portables
Modular Building
Outdoor Playground Equipment
Renovated Open Space
Field/Grass Areas
Parking Lot
Hardtop
Renovated Buildings
0 130
Scale (Feet)

Source: Johnson Favaro, 2022.

PlaceWorks

3. Project Description

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Phase 2 of the Proposed Project would also centralize the elementary playground areas and concentrate them closer to the core of the campus, which would result in a safe and visible play area. The field would be reconfigured to a standard rectangular play field centrally located in the southern portion of the campus (see Figure 7b, *Proposed Project's Site Plan – Phase 2*).

Phase 3

Phase 3 of the Proposed Project would require approximately 18,985 square feet of demolition, including the removal of four portable classrooms (P76-P79), and one kindergarten classroom and one special education classroom from Building B. A new 23,645-square-foot, 34-foot high, two-story classroom building would be developed to replace a portion of Building B. The interim parking lot along Pearl Place would be demolished and replaced with the new two-story classroom building (see Figure 7c, *Proposed Project's Site Plan – Phase 3*). The new classroom building would include one teaming studio, two Pre-K, one transition kindergarten, and four kindergarten classrooms on the ground floor. The second floor would include eight upper-elementary classrooms. Third- through fifth-grade classrooms would have capacity for 30 students, one instructor, and one aide/volunteer. The two new buildings would provide for 21 new classrooms. The remaining buildings would remain as is.

As shown in Table 7, *Summary of Total Proposed Project Development*, the Proposed Project would result in 21 new classrooms and support spaces for a total of 142,971 square feet of building space, providing the Grant ES campus with a total of 42 classrooms for a total of 207,986 square feet of building space. New building heights would not exceed 34 feet.

Table 7 Summary of Total Proposed Project's Development

Building	Status	Classrooms	Square Footage	Maximum Height
Renovation and Improvements				
Phase 1				
Library Renovation and Expansion	Existing	-	5,955	No Change
Transitional Kindergarten and Kindergarten Classroom Renovation (Building A)	Existing	3[1]	4,415	No Change
Central Garden Renovation	Existing	-	7,625	-
Subtotal – Renovation and Improvements		**3**	**17,995**	
New Construction				
Phase 2				
New Elementary Classrooms	New	6	10,626	34 ft.
New Playfields and Playgrounds	New	-	73,700	-
New Parking Lots Along 24th Court and Pearl Place	New	-	35,000	-
Phase 3				
New Two-Story Building	New	15	23,645	34 ft
Subtotal – New Development		**21**	**142,971**	

3. Project Description

Table 7 Summary of Total Proposed Project's Development

Building	Status	Classrooms	Square Footage	Maximum Height
Existing Buildings				
Building A	Existing	4	4,415	12 ft-1 in
Building B	Existing	4	3,285	16 ft-2 in (Original) 12 ft-1 in (addition)
Building C	Existing	4	5,815	16 ft-2 in
Building D	Existing	2	5,110	30 ft-7 in
Building E	Existing	-	5,105	22 ft-8 in
Building F	Existing	-	3,125	15 ft
Building G	Existing	-	2,830	16 ft-2 in
Building H	Existing	5	13,965	20 ft
Building K	Existing	3	3,370	18 ft-6 in
Subtotal – Existing Development		**21**	**47,020**	**-**
Total		**42**	**207,986**	**-**

Source: SMMUSD 2023.
[1] Consolidating existing classrooms in Building A from 4 to 3.

3.1.2 Site Access, Circulation, and Parking

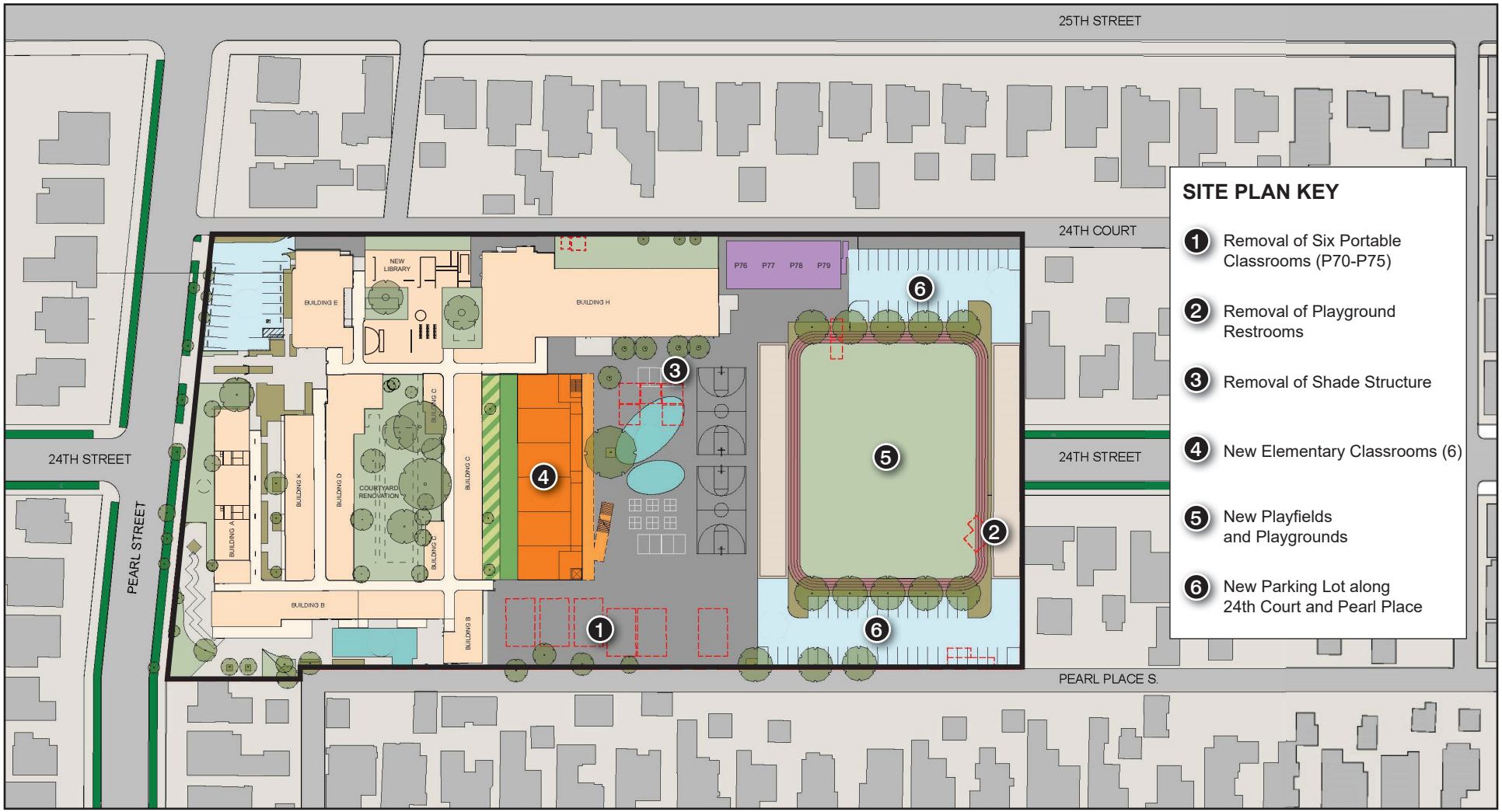
Currently, site access is provided from Pearl Street and along 24th Street. Curbside student pick-up and drop-off occurs along Pearl Street at the front of campus and a small number of students are dropped off at the rear of campus at the entrance to staff parking along 24th Street. A visitor and administrative parking lot, with 14 parking stalls, is in front of the auditorium and near the main entrance occupies the northeast corner of campus facing Pearl Street. An L-shaped staff parking lot with 48 parking stalls is at the southeast corner of the campus adjacent to the basketball courts and is accessed from 24th Street. Deliveries occur off the 24th Court Alley adjacent to the kitchen along with trash and recycle pick up at a service yard level with the alley.

Main site access would remain along Pearl Street. A new off-street lane for drop-off/pick-up is proposed adjacent to Pearl Street in front of the campus. The existing parking lot in the northeastern portion of the campus, with a total of 14 parking spaces, would remain and would be used for early education drop-off/pick-up and visitor parking.

The existing L-shaped parking lot in the southeast portion of the campus would be removed. Two new parking lots, located at the southeast and southwest corners of the campus, would be provided. Each parking lot would include approximately 40 parking stalls and would provide staff and after-hours/weekend community parking. An arrival court that connects south parking lots to 24th Street would be provided. Overall, the Proposed Project would increase parking on the existing campus from 62 to 100 parking spaces and reduce on-street parking.

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

Figure 7b - Proposed Project Site Plan - Phase 2



Grant ES Campus Boundary
Existing Building
Portables
Renovated Open Space
Outdoor Playground Equipment
New Proposed Building
Renovated Landscaping
Field/Grass Areas
Parking Lot
Structures Removed
Hardtop
Renovated Buildings
0 130
Scale (Feet)

Source: Johnson Favaro, 2022.

PlaceWorks

3. Project Description

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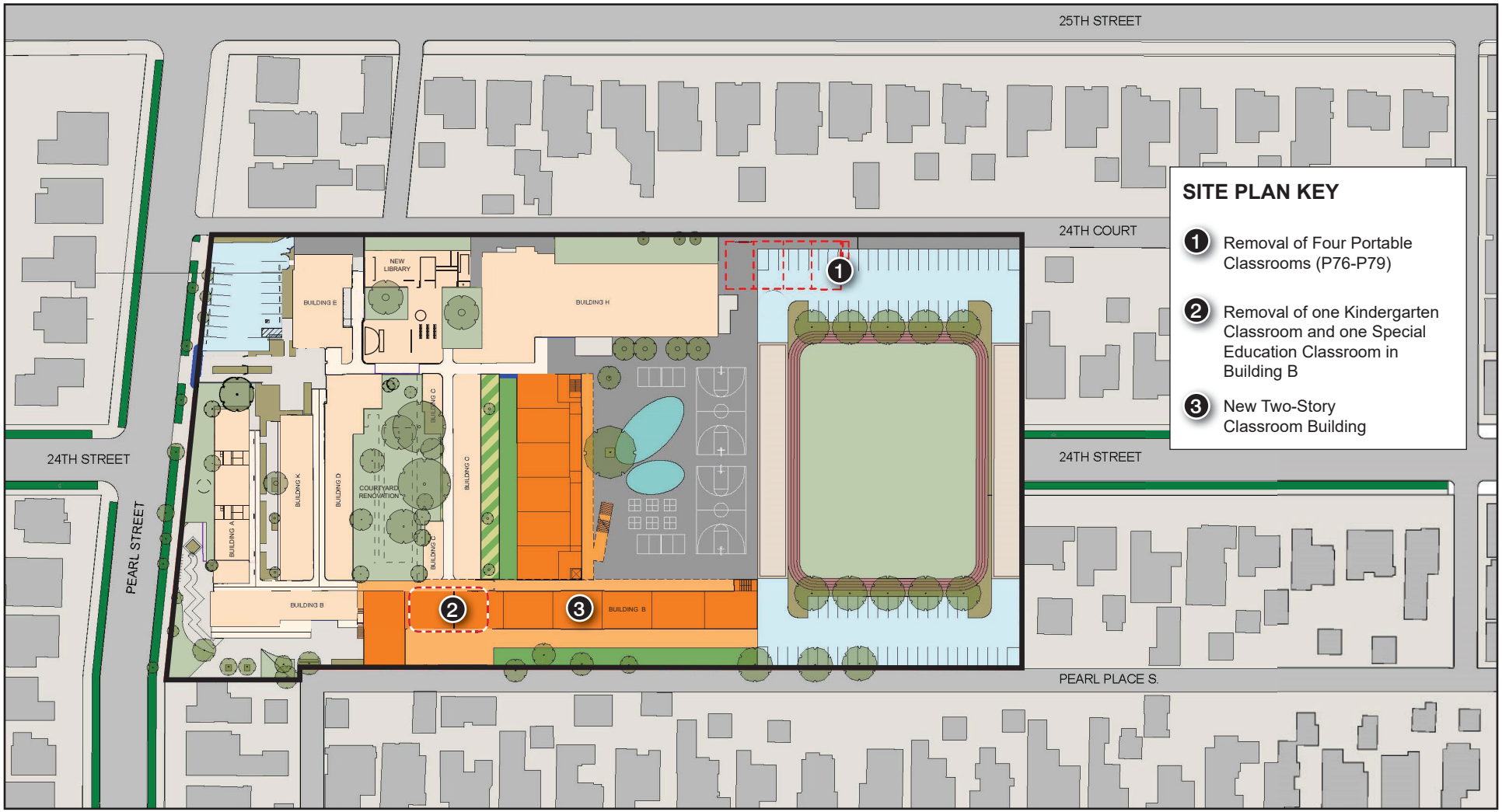
Figure 7c - Proposed Project Site Plan - Phase 3



Grant ES Campus Boundary
Existing Building
Renovated Open Space
Outdoor Playground Equipment
New Proposed Building
Renovated Landscaping
Field/Grass Areas
Parking Lot
Structures Removed
Hardtop
Renovated Buildings
0 130
Scale (Feet)

Source: Johnson Favaro, 2022.

PlaceWorks

3. Project Description

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3.1.3 Pedestrian Access

As described previously, student drop-off and pick-up and the main pedestrian entry would remain along Pearl Street at the front of campus and a small number of students are dropped off at the rear of campus at the arrival court. The Proposed Project would include an early education drop-off/pick-up area in the north parking lot, and an arrival court that connects south parking lots to 24th Street, which would also be accessible to pedestrians. All classrooms at ground and second floors would be connected via covered outdoor walkways on the inward-facing side of the east and west wings of the school buildings. Covered outdoor circulation would connect the east and west wings across the campus in three locations.

3.1.4 Safety and Security

Most of the campus is currently secured with buildings on the inward-facing sides of its east and west wings. Parking lots are secured with gates at each of the two vehicle access locations. The west, south, and east sides of campus are lined with chain-link fencing to secure the perimeters. The front, north side along Pearl Street uses buildings, fencing, and gates to maintain a secure perimeter. A forecourt area marked by low walls and gates in front of the main campus entrance and front office would be replaced to raise the wall and gate heights. Rolling gates provide parking lot access and emergency access at the south of campus onto the playgrounds. Gates along 24th Court provide delivery access into the back of the kitchen. Perimeter fencing would be added to secure the south parking lots and arrival court.

3.1.5 Landscaping Improvements

The Proposed Project would include new trees lining the east and west sides of the new field that would create connection with the parking lots. The campus's historic core features a central garden with mature specimen trees worthy of preservation, maintenance, and upgrade. Walkways and seating for students and faculty would be provided in the courtyard to increase pedestrian circulation in this area of the campus. California native plantings would be provided in the central garden near the existing mature trees. Landscaping would be provided along the northern boundary of the campus and outside of Building A, as part of the outdoor classrooms. The new outdoor area would connect to the existing kindergarten play area which is designed for active play. The Proposed Project would require the removal or relocation of one tree (windmill palm) to accommodate an ADA ramp leading to the Building D; however no sensitive tree species would be removed.

3.1.6 Sustainability Features

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

equipment that meet or exceed Title 24 standards, install solar photovoltaic (PV) panels on the District sites, establish a District standard that all future solar projects include energy storage systems, where feasible, install Title 24-compliant or better heating, ventilation, and air conditioning (HVAC) units for District sites that require cooling, install wireless thermostats for new HVAC units to allow District to implement energy-saving strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling, install energy management systems (EMS) for remaining school sites to allow control at both the site and District level, and connect wireless thermostats to the EMS. Additional bike racks would be installed to accommodate at least 10 percent of regular building occupants, with a goal to reach 20 percent capacity by 2030.

3.1.7 Utilities

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

Electrical

The school has two Southern California Edison (SCE) electrical services, one of which is a 400A 120/240V, 1P, 3W switchboard located outside between Building B and portable P70. The switchboard would be replaced as part of the Proposed Project.

Sewer

The existing campus has several points of connection to public sewer mains. Sewer mains generally run north to south on 24th Court and Pearl Place South alleys.

Water

The Proposed Project would upgrade faucet aerators and showerheads with high-efficiency alternatives. The Proposed Project would replace domestic plumbing fixtures with high-efficiency fixtures, including 0.125 gallons per flush (gpf) models for urinals, 0.8 gpf models for tank toilets, and 1.1 or 1.26 gpf models for flush valve toilets.

3.2 PROJECT CONSTRUCTION

The Proposed Project would be developed in three phases over approximately 15 years, with each phase dependent on funding availability with the exception of Phase 1, which is funded and designed. Construction of phase 1 would begin in May 2023 and be completed in August 2024. The construction would occur over approximately 15 months. Santa Monica Municipal Code section 4.12.110(a) limits the hours of construction to 8:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturday; construction is not allowed on Sundays or holidays. However, the District intends on obtaining the After-Hours Construction Permit, which would allow Proposed Project construction to begin at 7 am. The earlier arrival of contractors would allow them to be within the work area prior to student arrival/drop-off, thereby improving pedestrian safety and reducing traffic congestion during construction activities. As required under the After-Hours Construction

Permit, the District would need to provide one sign posting along the street frontage of each construction area and notifications to neighbors within a 500-foot radius of construction activities. The notifications must include a description of the activities covered under the After-Hours Construction Permit and the dates and times that these activities would take place. The notifications must also include the contact information of the permit holder (i.e., the District) and the City contact. The District would be required to follow Santa Monica Municipal Code section 4.12.1.110 and any allowances made by the City under the After-Hours Construction Permit.

School operation would continue during construction as under current conditions, and students would occupy existing buildings on the Grant ES campus during construction activities. Table 8, *Proposed Project's Phasing*, provides details for each construction phase, including timing, amount of demolition, new construction, and infrastructure improvements for each phase.

Table 8 Proposed Project's Phasing

Phase	Demolition	Demolition Square Footage	New Construction	New Building Square Footage	Timeline
1	• No demolition required in Phase 1	---	• Library Renovation and Expansion • Transitional Kindergarten and Kindergarten Classroom Renovation • Central Garden Improvements	250	May 2023 – August 2024
2	• Six Portable Classrooms (P70-P75) • Playground Restrooms • Shade Structures	36,460	• New Elementary Classrooms • New Playfields and Playgrounds • New Parking Lots Along 24th Court and Pearl Place	10,626	June 2025 – February 2027
3	• Four Portable Classrooms (P76-P79) • Building B – One Kindergarten Classroom • Building B – One Special Education Classroom	18,985	• New Two-Story Building	23,645	June 2027 – August 2028

Source: SMMUSD 2023.

Construction Phasing

Phase 1

Construction activities for Phase 1 are anticipated to begin in May 2023 and be completed in August 2024. Phase 1 of the Proposed Project would include renovation of the transitional kindergarten and kindergarten classrooms in Building A, expansion and renovation of the existing library in Buildings F and G, and improvements to the central garden/courtyard. This phase would include building construction, architectural coatings, and landscaping Phase 1 would not include building demolition or removal.

Phase 2

Construction activities for Phase 2 are anticipated to begin in June 2025 and be completed in February 2027. Construction activities would include building and asphalt demolition, minor grading, trenching for site utilities,

building construction, architectural coatings, paving, and landscaping. As shown in Table 8, Phase 2 of the Proposed Project would remove six portable classrooms (P70-P75), playground restrooms, and shade structures. Additionally, Phase 2 of the Proposed Project would include the construction of six new elementary classrooms in a new classroom building located south of Building C, new and reconfigured playfields and playgrounds, and new and reconfigured parking lots along 24th Court and Pearl Place.

Phase 3

Construction activities for Phase 3 are anticipated to begin in June 2027 and be completed in August 2028. Construction activities would include building and asphalt demolition, minor grading, trenching for site utilities, building construction, architectural coatings, paving, and landscaping. Phase 3 of the Proposed Project would include removal of four portable classrooms (P76-P79), removal of one kindergarten classroom in Building B, and removal of one special education classroom in Building B. Additionally, Phase 3 would include the construction of one new two-story building that would include transitional kindergarten and kindergarten classrooms.

3.2.2 Construction Grading

Proposed new construction would take place on the previously graded and developed areas of campus. Excavation would result in approximately 6,000 cubic yards of soil to be graded, as shown in Table 9, *Proposed Project Cut/Fill by Phase*. The soil is estimated to be balanced on-site and no imported soils would be necessary.

Table 9 Proposed Project Cut/Fill by Phase

Phase	Cut (cy)	Fill (cy)	Project Phase Total (cy)
1	0	0	0
2	2,700	2,700	0
3	3,300	3,300	0
Total	**6,000**	**6,000**	**0**

Source: SMMUSD 2022

3.2.3 Construction Traffic

Construction of the Proposed Project would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to the campus as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the campus would require several oversized vehicles that may travel at slower speeds than existing traffic. Construction traffic would be scheduled in concert with the operations of the school, ensuring that trucks are not moving in or out during drop-off or pick-up times. As described in Section 3.2*, Project Construction*, above, the District intends to obtain and After-Hours Construction Permit, which would allow Proposed Project construction from to begin at 7:00 a.m.., instead of 8: a.m. The earlier arrival of the contractor would allow them to be within the work area prior to student arrival/drop-off, which would improve safety and reduce traffic congestion during construction activities. Additionally, construction workers would park in the

designated staging area to provide adequate parking for all employees and visitors to the campus throughout the duration of construction of the Proposed Project.

3.2.4 Construction Staging

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

3.3 REQUIRED PERMITS AND APPROVALS

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

3.3.1 Lead Agency Approval

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

3.3.2 Other Required Permits and Approvals

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

State Agencies

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

City of Santa Monica

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

3.3.3 Other Reviewing Agency Actions and Approvals

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

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

4. Environmental Checklist

4.1 PROJECT INFORMATION

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

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

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

4. **Project Location:**
   The Grant ES campus is located at 2368 Pearl Street (Assessor's Parcel Map Number [APN] 4273-009-900) in the Sunset Park neighborhood of the city of Santa Monica, Los Angeles County, California. The campus consists of a 6.01-acre rectangular parcel that includes the existing Grant Elementary School campus and is entirely District-owned. The campus is approximately 0.5-miles south of Interstate 10 (I-10), two miles east of the Pacific Coast Highway (PCH) and Santa Monica State Beach, and is bounded by Pearl Street to the north, residences across 24th Court (alley) to the east, residences across Pearl Place South (alley) to the west, and a residential neighborhood to the south. Grant ES in an urban area surrounded by residential neighborhoods. Direct access to the campus is provided by Pearl Street, with student drop-off/pick-up occurring along Pearl Street.

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

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

7. **Zoning:** Institutional/Public Lands

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

4. Environmental Checklist

9. Surrounding Land Uses and Setting:

The Grant ES campus is surrounded on all four sides by low-density single-family residential neighborhoods zoned Single-Family Residential.

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

State Agencies

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

City of Santa Monica

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

Other Reviewing Agency Actions and Approvals

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

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

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

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

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

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

4.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

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

Carey Upton Digitally signed by Carey Upton
DN: cn=Carey Upton, o=Santa Monica - Malibu Unified School District, ou=Chief Operations Officer, email=cupton@smmusd.org, c=US
Date: 2023.01.10 14:08:19 -08'00'

Signature — *Date* 1/10/2023

Carey Upton, Chief Operations Officer

4.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9. The explanation of each issue should identify:

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

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

4. Environmental Checklist

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

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

4. Environmental Checklist

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

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

4. Environmental Checklist

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

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

4. Environmental Checklist

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5. Environmental Analysis

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

5.1 AESTHETICS

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

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

Less Than Significant Impact. Scenic vistas are panoramic views of features such as mountains, forests, the ocean, or urban skylines. The City's scenic resources include the Santa Monica State Beach, the Pacific Ocean, Santa Monica Canyon, the Santa Monica Mountains National Recreational Area, Marine Park, and the bluffs overlooking the beach (City of Santa Monica 2015). The City's scenic vistas can be characterized as hillside areas south of Ocean Park Boulevard, Palisades Park, Hotchkiss Park, and the east-west streets from the beach to Ocean Avenue. The closest scenic vista to the campus is the hillsides south of Ocean Park Boulevard approximately 1.5 miles away. There are no protected or designated scenic vistas or views in the Proposed Project vicinity, and the Proposed Project would not obscure any scenic vistas.

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

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

No Impact. The closest designated state scenic highway is Route 27 (designated in March 2017), approximately seven miles northwest of the campus. The nearest eligible designated state scenic highway is Pacific Coast Highway (PCH), located 1.4 miles west of the campus (Caltrans 2019). The Proposed Project would not be visible from a scenic highway, and would not result in changes to existing uses, and construction would remain within the campus. Therefore, the Proposed Project would not damage scenic resources within a state scenic highway. No impacts would occur, and this impact will not be further analyzed in the EIR.

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

Potentially Significant Impact. The Grant ES campus contains an existing developed elementary school campus. It is surrounded by adjacent residential uses and qualifies as an "urbanized area."[2] The Proposed Project includes the removal of two classroom buildings, ten portable classrooms, playground restrooms, and shade structures; renovation and improvements of the transitional kindergarten and kindergarten classrooms, library, and central garden; and development of elementary classrooms building, playfields and playgrounds, parking lots, and a two-story building. The Proposed Project would reconstruct and modernized the school and would not conflict with the Institutional zoning or regulations governing scenic quality. The new buildings could differ in scale, mass, density, and character. Therefore, the Proposed Project could potentially result in the degradation of the visual character and quality of public views of the campus and its surroundings. Impacts would be potentially significant, and this issue will be further analyzed in the EIR.

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

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

5.2 AGRICULTURE AND FORESTRY RESOURCES

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

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

conducted by the Natural Resources Conservation Service. The DOC manages the Williamson Act Contract Land Map showing William Act Contracts, updated in 2017.

Would the project:

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

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

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

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

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

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

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

No Impact. The Grant ES campus is located on the campus of an existing elementary school within a built-out area, and no significant forest land uses are present onsite nor in the immediate vicinity. Development of

the Proposed Project would not require any changes to the existing environment that could result in the conversion of forest land to non-forest use. Therefore, no impacts would occur and this issue will not be further analyzed in the EIR.

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

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

5.3 AIR QUALITY

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

Would the project:

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

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

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

Potentially Significant Impact. The SoCAB is designated nonattainment for Ozone (O_3) and fine particulate matter ($PM_{2.5}$) under the California and National AAQS, nonattainment for particulate matter (PM_{10}) under the California AAQS, and nonattainment for lead under the National AAQS (US EPA 2022). According to South

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

Coast AQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact (South Coast AQMD 1993). Construction activities associated with the Proposed Project would generate a short-term increase in air pollutants that could cumulatively contribute to the nonattainment designations of the SoCAB. Because the Proposed Project is not anticipated to result in an increase in student capacity, it would not result in an increase in emissions during long-term operation of proposed facilities and would not cumulatively contribute to the nonattainment designations within the region. The EIR will further evaluate the Proposed Project's potential to result in a cumulatively considerable net increase in criteria pollutants. Mitigation measures will be identified as necessary.

c) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive populations are more susceptible to the effects of air pollution than the general population. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. Groups of individuals most likely to be affected by air pollution are those most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. The closest sensitive receptors include the student population as well as the adjacent residential uses to the Grant ES campus along Pearl Street to the north, 24th Court to the east, 24th Street to the south, and Pearl Place South to the west.

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

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

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

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

The type of facilities that are considered to have objectionable odors include wastewater treatment plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Proposed Project would modernize and upgrade the existing Grant ES and would not result in the types of odors generated by the aforementioned land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities, may generate odors. However, these odors would be low in concentration and temporary. Therefore, overall, any odors generate from construction and operation of the Proposed Project are not expected to affect a substantial number of people. Therefore, impacts would be less than significant. This issue will not be addressed in the EIR.

5.4 BIOLOGICAL RESOURCES

Would the project:

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

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

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

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

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. According to the USFWS's NWI, there are no wetlands near or within the Grant ES campus (USFWS 2022). The campus is entirely developed and does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. Therefore, no wetlands would be impacted by the development activities that would occur on-site as a part of the Proposed Project. No impact would occur. This issue will not be further analyzed in the EIR.

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

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

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

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

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

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

No Impact. The Proposed Project would comply with the City of Santa Monica tree protection ordinance SMMC Chapter 7.40, Tree Code section 7.40.160 Protection of Trees; which requires that during the erection, repair, alteration or removal of any building, house, or structure in the City, any person in charge of such work shall protect any tree, shrub or plant in any street, sidewalk, parkway, alley or other public property within the City in the vicinity of such building or structure with sufficient guards or protectors as to prevent injury to said tree, shrub or plant arising out of or by reason of said erection, repair, alteration or removal.. One existing tree would be removed as part of the Proposed Project within the campus. The campus is not considered to be public property, as described in the SMMC, which focuses on City of Santa Monica property. No trees in public property, including adjacent sidewalks or street trees, would be removed or damaged as a result of implementation of the Proposed Project. Because the trees that may be potentially removed within the school campus are not protected by a preservation policy or an ordinance the impacts of tree removal and/or relocation would be less than significant. The Proposed Project would not conflict with local polices or ordinances protecting biological resources. This issue will not be further analyzed in the EIR.

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

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

5.5 CULTURAL RESOURCES

Would the project:

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

Potentially Significant Impact. According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." As discussed above in Section 3, *Project Description*, a portion of the Grant ES campus appears eligible for listing in the California Register of Historical Resources under Criteria 1 and 3, and for local listing per SMMC section 9.56.100 (Landmarks and Historic Districts Ordinance) under Criteria 1, 4, and 5 as a historic district comprising multiple buildings and associated site/landscape features (see Table 5, *Features in the Historic District*). Grant ES does not appear eligible for listing in the National Register of Historic Places due to compromised integrity. The Proposed Project would result in building demolition and construction of new buildings that are part of a historic district. A historical resources assessment will be prepared to assess potential

impacts to historical resources, in conformance with BP and AD 7113 as they relate to Grant ES. Therefore, impacts to historical resources are potentially significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project would require ground disturbing activities within the Grant ES campus during construction, which may result in the disturbance of archaeological resources. Excavation to depths greater than current foundations has the potential to encounter unknown archaeological resources. An archaeological resources assessment will be prepared to assess potential impacts to archaeological resources. Therefore, impacts to archaeological resources are potentially significant and will be further analyzed in the EIR.

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

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

5.6 ENERGY

Would the project:

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

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

Construction of the Proposed Project would require energy use to power the construction equipment. The energy use would vary during construction of the Proposed Project — the majority of construction equipment

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

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

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

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

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

5.7 GEOLOGY AND SOILS

The following evaluation of geology and soils is based, in part, on the Geotechnical Investigation Report prepared for the campus in December 2021 (Converse Consultants 2021). The Geotechnical Investigation Report assessed geologic and soil conditions at the campus.

Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other

substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones are the regulatory zones that include surface traces of active faults. There are no known faults or fault traces that pass through the campus, and the campus is not located within an Alquist-Priolo Earthquake Fault Zone (Converse Consultants 2021). The nearest active fault is the Santa Monica Fault approximately 1.3 mile north of the campus (Converse Consultants 2021). Therefore, there would be no impact associated with rupture of a known earthquake fault. This issue will not be analyzed further in the Draft EIR.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The campus is situated in a seismically active region. As is the case for most areas of Southern California, ground-shaking resulting from earthquakes associated with nearby and more distant faults may occur at the campus. The closest major active faults are the Santa Monica Fault, Malibu Coast Fault, Newport-Inglewood Fault, Hollywood Fault, and the Palos Verdes Fault, approximately 1.3, 4, 4, 5, and 6 miles away respectively. These faults could have the potential to generate strong seismic ground shaking at the campus during an earthquake event. During the operation of the proposed development, seismic activity associated with active faults can be expected to generate moderate to strong ground shaking at the campus. Review of recent seismological and geophysical publications indicates that the seismic hazard for the campus is high (Converse Consultants 2021).

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

5. Environmental Analysis

iii) Seismic-related ground failure, including liquefaction?

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

The campus is not located within a mapped potential liquefaction zone per the State of California Seismic Hazard Zones Map Beverly Hills Quadrangle and the City of Santa Monica Geological Hazards Map (Converse Consultants 2021). Due to the relatively dense nature of the underlying soils and the depths to historic high groundwater levels of about 40 feet below ground surface (bgs), the potential for liquefaction is low (Converse Consultants 2021). Therefore, impacts would be less than significant, and this impact will not be further analyzed in the EIR.

iv) Landslides?

Less Than Significant Impact. Significant landslides and erosion typically occur on steep slopes where stormwater and high winds can carry topsoil down hillsides. The campus is not located within a landslide zone or within an area mapped as potentially susceptible to seismically-inducted landslides (Converse Consultants 2021). The campus is relatively level with no steep slopes or significant topography on or near the campus. Implementation of the Proposed Project would not expose people or structures to substantial adverse hazards due to landslides, and impacts would be less than significant. This impact will not be further analyzed in the EIR.

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

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

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

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

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

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

Lateral Spreading: Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. It differs from the slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. Lateral spreading is demonstrated by near-vertical cracks with predominantly horizontal movement of the soil mass involved. The topography at the Grant ES campus and in the immediate vicinity of the Site is relatively flat, with no significant nearby slopes or embankments. The potential for lateral spreading at the campus is considered negligible (Converse Consultants 2021). Therefore, this impact would be less than significant and will not be further analyzed in the EIR.

Subsidence: The major cause of ground subsidence is the excessive withdrawal of groundwater. Soils with high silt or clay content are particularly susceptible to subsidence. The geologic materials encountered during field exploration consist of existing fill and natural alluvial soils. The fill soils consist primarily of silty sands with minor clay fines. The alluvial soil deposits below the fill consist of poorly graded silty sand. Soil shrinkage and/or bulking as a result of remedial grading depends on several factors including the depth of over-excavation, and the grading method and equipment utilized, and average relative compaction. The Proposed Project would adhere to the various design recommendations provided in the Geotechnical Investigation Report. The Proposed Project would not result in excessive withdrawal of groundwater during construction and operation. Therefore, impacts associated with subsidence would be less than significant and will not be further analyzed in the EIR.

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

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

Less Than Significant Impact. Expansive or shrink-swell soils are soils that swell when subjected to moisture and shrink when dry. Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. According to the Geotechnical Investigation Report, one expansion index test was performed for the upper five feet of the on-site soils. The results of the test indicate the underlying soils have a very low expansion potential. Mitigation for expansive soil is not necessary based on the soil materials encountered (Converse Consultants 2021). The Proposed Project would follow design recommendations listed in the geotechnical report prepared for the Proposed Project. These include, but are not limited to, seismic design parameters, foundation design, grading, use of nonexpansive soils, etc. Additionally, implementation of standard engineering and earthwork construction practices, such as proper foundation design and proper moisture conditioning of earthen fills, would reduce the effects associated with expansive soils. Impacts resulting from expansive soils would be less than significant, and this impact will not be further analyzed in the EIR.

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

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

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

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

5.8 GREENHOUSE GAS EMISSIONS

Would the project:

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

Potentially Significant Impact. Global climate change is not confined to a particular project site and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly. The issue of global climate change is thus, by definition, only a cumulative environmental impact. Through its governor and legislature, the State of California has established a comprehensive

framework to substantially reduce GHG emissions over the next 40 years and beyond. Reduction measures will occur primarily through the implementation of Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and Senate Bill 375 (SB 375), which address GHG emissions on a statewide, cumulative basis.

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

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

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

5.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

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

Construction

During the construction phase, hazardous materials in the form of solvents, glues, and other common construction materials containing toxic substances may be transported to the site, and construction waste that possibly contains hazardous materials could be transported off-site for disposal. Federal, state, and local regulations govern the disposal of wastes identified as hazardous that could be produced during removal of existing asphalt and storage buildings, as well as during construction activities. The use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws

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

Operation

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

The use, storage, transport, and disposal of hazardous materials of the Proposed Project would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, County of Los Angeles Department of Environmental Health, and LACoFD. Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during the Proposed Project's operation would not occur. Impacts would be less than significant. This topic will not be further analyzed in the EIR.

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

Potentially Significant Impact. A Phase I ESA conducted for the Proposed Project concluded that there is no evidence of a vapor encroachment condition (VEC), recognized environmental condition (REC), controlled REC, or historic REC (HREC) in connection with the campus. However, based on the age of historical and

structures currently on the campus, arsenic, lead-based paint, asbestos, pesticides, and PCBs in caulking may have been historically used at the campus (NV5 2022). As a result, there is a potential for these compounds to be present in the shallow soils on-site. Based on the findings of this assessment, the Proposed Project could result in a risk of release of hazardous materials into the environment. Therefore, potentially significant impacts may occur. This topic will be further analyzed in the EIR.

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

Potentially Significant Impact. The Proposed Project encompasses 5.41 acres of the 6.01-acre Grant ES campus. As discussed in 3.9(a), operation of the Proposed Project is not anticipated to involve the handling of hazardous materials other than commercial cleansers, lubricants, and paints in limited quantities. However, construction of the Proposed Project would include the use and transport of hazardous materials in the form of fuel, solvents, glues, and other common construction materials containing toxic substances and construction waste. Furthermore, as discussed in 3.9(b), based on the age of historical and current structures on the campus, the Proposed Project could involve a risk of release of hazardous materials into the environment. Therefore, implementation of the Proposed Project could result in hazardous emissions or handling of acutely hazardous materials, substances, or waste. Impacts would be potentially significant. This topic will be further discussed in the EIR.

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

Potentially Significant Impact. Government Code section 65962.5 specifies lists of the following types of hazardous materials sites: hazardous waste facilities; hazardous waste discharges for which the State Water Resources Control Board (SWRCB) has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. The Grant ES campus does not appear on any regulatory agency database such as GeoTracker and EnviroStor (DTSC 2022; SWRCB 2022). Further evaluation in the EIR is required to identify whether hazardous materials sites exist in the vicinity of the campus. Therefore, impacts are potentially significant and this issue will be further analyzed in the EIR.

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

Less Than Significant Impact. The nearest public-use airport to the campus is Santa Monica Airport, approximately 0.5-mile southeast of the campus. The airport is governed by the Santa Monica Airport Code and the Los Angeles Regional Planning Commission /Airport Land Use Commission's Airport Land Use Compatibility (ALUC) guidelines (Los Angeles County ALUC 2004). The campus is not located within the airport's Planning Boundary/Airport Influence Area (Los Angeles County ALUC 2003), and therefore, the Proposed Project is not subject to the airport's land use restrictions. Federal Aviation Regulations Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Federal Aviation

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Regulations Part 77 requires that any applicant who intends to perform any construction or alterations to structures that exceed 200 feet in height above ground level must notify the Federal Aviation Administration for the Proposed Project's approval. The Proposed Project does not include structures 200 feet or greater in height that would conflict with FAR Part 77 regulations. The tallest building would not exceed 34 feet. As a result, the Proposed Project would not result in safety hazards for people residing or working in the area.

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

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

Potentially Significant Impact. The Standardized Emergency Management System (SEMS), California Code of Regulations, Title 19, Division 2, section 2443, requires compliance with the SEMS to "be documented in the areas of planning, training, exercise, and performance." Emergency preparedness in the City of Santa Monica is overseen by the Office Emergency Management (OEM), and includes the Community Emergency Response Team (CERT) and a business continuity plan**.** The OEM addresses the planned response by the City of Santa Monica to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The purpose of EOM is to protect the community of Santa Monica from the loss of life and property in the event of a natural or man-made disaster (City of Santa Monica 2022c). Additionally, the City of Santa Monica Office of Emergency Management has adopted a Multi-Hazard Functional Emergency Plan, which is intended to address a wide range of natural and manmade emergencies and disasters (City of Santa Monica 2013). The District and Santa Monica College adopted an All-Hazard Mitigation Plan, which includes strategies and recommendations to reduce risks associated with the identified hazards (SMMUSD 2017). In addition, the District adopted a Comprehensive School Safety Plan for all campuses, including the Grant ES campus, that addresses specific procedures to follow in the event of various types of emergencies (SMMUSD 2018).

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

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

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

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

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

5.10 HYDROLOGY AND WATER QUALITY

Would the project:

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

Potentially Significant Impact. Urban runoff from storms or nuisance flows (runoff during dry periods) from development projects can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, fertilizers, pesticides, trash, and sediment. This runoff can flow directly into local streams or into storm drains and continue through pipes until it is released untreated into a local waterway and eventually the ocean. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats.

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

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

Potentially Significant Impact. The City of Santa Monica supplies potable water through a combination of local groundwater (approximately 60-70 percent of the total water supply) and imported water from the Metropolitan Water District (MWD), which accounts for approximately 30-40 percent of total water supply (Santa Monica 2021). As described in Section 3, *Project Description*, the Proposed Project would not change current enrollment or staffing therefore overall water demand is not expected to increase (and could in fact

decrease with new fixtures and irrigation). Therefore, there would be no significant change in water use and no impact on groundwater supplies.

Additionally, it is unlikely that groundwater would be encountered during construction that would require dewatering, since groundwater was not encountered during the geotechnical investigation in boreholes drilled to a maximum depth of approximately 21 feet bgs. The historic depth of groundwater is documented at depths ranging from 40 feet bgs (Converse Consultants 2021). Therefore, construction dewatering would not be necessary and would not impact groundwater recharge.

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

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

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

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

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

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

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

The operational phase of the Proposed Project would contain Low-Impact Development (LID) design features to reduce the impact of erosion and siltation. The site design, source control, and treatment control BMPs for the operational phase would include the following:

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

The Proposed Project would adhere to the postconstruction requirements of the CGP and measures identified in SMMC Chapter 7.10, Runoff Conservation And Sustainable Management, which includes implementation of LID methods and the preparation of an Urban Runoff Mitigation Plan. Compliance with existing state and local regulations developed to minimize erosion and siltation during the operational phase would reduce impacts to less than significant.

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

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

Less than Significant Impact. The campus is already built out with hardscape and impervious surfaces. Runoff at the existing school is currently collected via ditches and storm drain inlets and conveyed to

underground piping that connects to existing storm drains within 24th Court and Pearl Place. With the implementation of the Proposed Project's LID features, including vegetated swales, and flow-through, the amount of stormwater runoff reaching the City's storm drain system would be less than under existing conditions.

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

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

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

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

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

iv) Impede or redirect flood flows?

No Impact. The campus is within Federal Emergency Management Act (FEMA) Flood Zone Designation X (Zone X) (FEMA 2021). Zone X is an area of minimal flood hazard, usually depicted on Flood Insurance Rate Maps (FIRMs) as above the 500-year flood level. Additionally, the Grant ES campus is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2022). The campus is not within a flood hazard area and implementation of the Proposed Project would not place new structures within a flood hazard area or redirect flood flows; therefore, no impact would occur. This issue will not be further analyzed in the EIR.

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

No Impact. The following describes potential pollutant impacts related to flood hazard, seiche, and tsunami zones.

As noted in Section 3.10(c)(iv), above, the Grant ES campus is not in a flood hazard area.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. The Riviera Reservoir is located approximately three miles north of the campus. According to the California Department of Water Resources' Dam Breach Inundation Map, the campus is not within the reservoir's inundation area (DSOD 2022). Therefore, there is no risk of pollutant release due to inundation from a seiche.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The campus is approximately two miles inland from the Pacific Ocean, at an elevation of approximately 156 feet above mean sea level, outside of the tsunami hazard zone identified by the California Department of Conservation's Los Angeles County Tsunami Hazard Areas map (DOC 2021). Therefore, the Proposed Project would not risk release of pollutants due to inundation. No impact would occur, and this issue will not be further analyzed in the EIR.

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

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

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

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

Compliance with existing laws and regulations would ensure that the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and would result in a less than significant impact, and this issue will not be further analyzed in the EIR.

5.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

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

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

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

5.12 MINERAL RESOURCES

Would the project:

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

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

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

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

5.13 NOISE

Would the project result in:

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

Potentially Significant Impact. Implementation of the Proposed Project would involve construction, including removal of some existing buildings/facilities, and operational activities that would generate noise levels that may expose sensitive land uses to noise levels in excess of the noise standards. Short-term construction activities could elevate ambient noise levels at nearby noise-sensitive receptors. Santa Monica Municipal Code section 4.12.110(a) limits construction to the hours of 8:00 a.m. to 6 p.m., Monday through Friday; 9:00 a.m. to 5:00 p.m. on Saturday. Construction is not allowed on Sundays or on holidays. However, the District intends on obtaining the After-Hours Construction Permit, which would allow the Proposed Project's construction to begin at 7 a.m. to help improve pedestrian safety and reduce traffic congestion during construction activities. According to section 4.12.110(b) noise created by construction activity shall not cause the equivalent noise level to exceed the noise standards specified in Table 10, *Noise Standards for Zone I* below, for the noise zone where the measurement is taken, plus 20 dBA. The Proposed Project's construction activities could result in a substantial temporary increase in ambient noise levels in the Proposed Project's vicinity. Impacts are potentially significant.

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Table 10 Noise Standards for Noise Zone I1

Days	Time Interval	Allow Leq (Exterior Noise)	Allow Leq (Construction Noise)	Allow Leq (Exterior Noise)	Allow Leq (Construction Noise)
		15-minute continuous measurement period		5-minute continuous measurement period	
Monday- Friday[1]	10 p.m. to 7 a.m.	50 dBA	70 dBA	55 dBA	75 dBA
	7 a.m. to 10 p.m.	60 dBA	80 dBA	65 dBA	85 dBA
Saturday and Sunday[2]	10 p.m. to 7 a.m.	50 dBA	70 dBA	55 dBA	75 dBA
	8 a.m. to 10 p.m.	60 dBA	80 dBA	65 dBA	85 dBA

Source: Santa Monica Municipal Code 2022, Chapter 4.12, Noise
[1] All property in a residential district established by Santa Monica Municipal Code section 9.02.010(B)(1) or any revisions thereto; except, however, the Santa Monica Pier shall be excluded from this noise zone.
[2] No Construction will be allowed on Sunday or holidays

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

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

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

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

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

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

5.14 POPULATION AND HOUSING

Would the project:

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

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

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

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

5.15 PUBLIC SERVICES

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

a) Fire protection?

Less Than Significant Impact. Fire protection services are provided to the campus by the City of Santa Monica Fire Department (SMFD). The Grant ES campus is served by Fire Station 5 located at 2450 Ashland Ave, approximately one-half-mile south of the campus. Fire Station 5 is both a traditional fire-fighting company, as well responding to aircraft- and hazardous materials-related emergencies. The station houses a regular paramedic fire engine, an aircraft rescue fire fighting vehicle, and a hazardous materials response truck. (SMFD 2022). The proposed campus modernization efforts would not result in an increase in student enrollment or faculty at the campus. As such, the Proposed Project would not increase demand for fire protection services beyond existing conditions. Furthermore, upgrades to existing buildings and construction of new buildings would be subject to current fire code and SMFD requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would be subject to DSA review to ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by DSA and California's building codes (Title 24 of the California Code of Regulations). DSA would review fire department and emergency access roadways and school drop-off and pickup areas to ensure adequate emergency access is maintained. Fire alarm systems, elevator systems, and building occupancy would also be reviewed for compliance with current safety standards and regulations. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives such that environmental impacts would result. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

b) Police protection?

Less Than Significant Impact. Police protection services are provided to the campus by the Santa Monica Police Department (SMPD). The SMPD operates from one station located at 333 Olympic Boulevard, approximately two miles west of the campus. The campus is within Beat Two, which is a patrol area bounded by Pico Boulevard to the north, Bundy Drive to the east, Dewey Street to the south, and 2nd Street to the west (SMPD 2021). According to the most recent SMPD Biennial Report for 2019 to 2020, the SMPD is comprised of 219 sworn officers and 205 civilian personnel. In 2020, the SMPD responded to 97,000 calls for service (SMPD 2021). The Proposed Project would not increase student enrollment or staff and would not induce population growth; therefore, the Proposed Project would not increase the need for additional police protection services. Active construction areas would be fenced and would remain secured outside of work hours. Any

increase in police demands would be temporary and would not require construction of new or expanded police facilities. Since the Proposed Project would not increase the student population or intensify use of the campus, project implementation would not increase the demand for police services or generate a need for additional law enforcement facilities. The Proposed Project would not increase student population or demand and would not result in adverse impacts on existing police service such that environmental impacts would result. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

c) Schools?

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

d) Parks?

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

e) Other public facilities?

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

5.16 RECREATION

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

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

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

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

5.17 TRANSPORTATION

Would the project:

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

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

transit, roadway, bicycle, and pedestrian facilities. This impact is potentially significant and will be further analyzed in the EIR.

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

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

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

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

Potentially Significant Impact. Main site access would remain along Pearl Street. A new off-street lane for drop-off/pick-up is proposed adjacent to Pearl Street in front of the campus, which is intended to improve overall vehicle and safety conditions. However, the potential for vehicle or pedestrian conflicts would be addressed. Two new parking lots, located at the southeast and southwest corners of the campus, would be provided. The new off-street lane for drop-off/pick-up and new parking areas could increase hazards if not properly designed and constructed. Therefore, impacts are considered potentially significant in this regard. An access and pedestrian safety analysis will be prepared to assess existing and proposed conditions for vehicular access (parking and pick-up/drop-off operations) and safety related to pedestrian circulation. Impacts related to circulation/transportation design features are potentially significant and will be further analyzed in the EIR.

d) Result in inadequate emergency access?

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

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

5.18 TRIBAL CULTURAL RESOURCES

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

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

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

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

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

In addition to notification of and potential consultation with Native American tribes that have requested to be notified of projects in the City, a Sacred Lands search request was sent to the Native American Heritage Commission (NAHC). The NAHC indicated that that there are no sacred lands known within the Grant ES campus and immediate area. Impacts to tribal cultural resources will be further analyzed in the EIR.

5.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less Than Significant Impact. The City of Santa Monica Department of Public Works is responsible for wastewater, water, and storm drainage services for the City, including Grant ES. Frontier Communications and Spectrum provide telecommunications services to the City of Santa Monica. Southern California Edison provides electricity and Southern California Gas provides natural gas to the City of Santa Monica.

As overall uses would not change, the Proposed Project would not result in an increase in indoor water use or sewer generation than existing conditions as the Proposed Project. Additionally, the Proposed Project would upgrade faucet aerators with high-efficiency alternatives and replace domestic plumbing fixtures with high-efficiency fixtures. All these measures would reduce indoor water demand and subsequently decrease sewer generation.

While there would be reconfigured landscaped areas on-site requiring additional watering, SMMUSD implements a water conservation program to uphold an agreement with the City to reduce the City's water consumption by 2 million gallons per year to support the City's 20 percent water reduction goal. SMMUSD currently implements full water monitoring software and smart water meters that enable ongoing monitoring of water use and provides real-time leak detection alerts. The District is also conducting irrigation system repairs and installing irrigation system controllers (SMMUSD 2019). With incorporation of the school's active water conservation practices and design, in accordance with the SMMUSD's agreement with the City, the Proposed Project would not increase outdoor water demand. Additionally, the Proposed Project would not require the

construction of new water or wastewater facilities that would result in a physical impact to the environment. Therefore, impacts would be less than significant.

Stormwater runoff at the existing school is currently collected via swales and storm drain inlets and conveyed by an internal storm drain system that connects to the City's existing storm drains beneath 24th Court and Pearl Place. Implementation of the Proposed Project would not include the relocation or expansion of the City's exiting storm drains and impacts would be less than significant.

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 (Title 24, California Code of Regulations, Part 6) and California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11). The Proposed Project would be developed with CHPS Green Building Resolution Standards, and would be consistent with the energy-related goals and actions of the Districtwide Plan for Sustainability (SMMUSD 2019. As part of implementation of the Strategic Energy Management Plan, the District would continue to install occupancy sensors in all classrooms and offices to allow lights to be shut off when unoccupied, establish lighting and equipment efficiency standards for all new equipment that meet or exceed Title 24 standards, install solar PV panels on the District sites, establish a District standard that all future solar projects include energy storage systems, where feasible, install Title 24-compliant or better HVAC units for District sites that require cooling, install wireless thermostats for new HVAC units to allow District to implement energy-saving strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling, install EMS for remaining school sites to allow control at both the site and District level, and connect wireless thermostats to the EMS.

Additionally, the Proposed Project would only replace two SCE electrical services switchboards which would not cause a significant environmental effect. Therefore, there would be no impacts associated with electric power, natural gas, or telecommunications facilities and this topic will not be discussed in the EIR.

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

Less Than Significant Impact. The City currently provides over 10,500 acre-feet of water annually to approximately 18,400 service connections, including to institutional uses such as schools, which account for 3 percent of total water usage in the City. The City has adequate water supply to meet projected demand through 2040 during normal, dry, and multiple dry years (Santa Monica 2021).

The District has goals to reduce water consumption by 20 percent compared to the 2017-2018 baseline by 2025, and by 30 percent by 2030. To achieve this, the District is working with the City to implement water conservation and efficiency measures, such as installing faucet aerators; toilets, and urinals; irrigation system repairs and controllers; and water monitoring software. The District is also working with the City of Santa Monica to install flow restrictors and pre-rinse spray valves for food service facilities (SMMUSD 2019).

The Proposed Project would not result in substantially more water than existing conditions as the Proposed Project would not increase capacity and the increase in outdoor water use would be reduced with incorporation of the school's active water conservation practices and design. Additionally, the new school buildings would be

designed to meet the California 2022 Building Code, including Title 24. Therefore, impacts would be less than significant and this topic will not be discussed in the EIR.

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

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

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

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

Less Than Significant Impact. The District's municipal solid waste services are supplied by Waste Management and include landfill trash, comingled recycling, and organic waste collection and disposal (SMMUSD 2019). A total of 88 percent of the solid waste generated in the City of Santa Monica is disposed of at the Chiquita Canyon Sanitary Landfill and the Sunshine Canyon City/County Landfill.

The District's solid waste program strives to minimize waste production and landfill disposal resulting from daily operations and construction activities through the implementation of comprehensive waste minimization, reuse, recycling, organic waste, and education programs. The District has a goal of reducing total waste generation by 10 percent compared to the 2017-2018 baseline by 2025, and by 20 percent by 2030. The District also has a goal to increase diversion from landfills to 85 percent by 2030. Current initiatives include water bottle filling stations, branded reusable bottles for sale, banning plastic straws, identifying alternatives to plastic containers, reusing green waste, food waste composting, and e-waste recycling. The District is also committed to managing construction and demolition waste using waste prevention/diversion principles and strives to exceed the CalGreen waste diversion requirements (SMMUSD 2019).

Demolition of the existing buildings would generate demolition debris. Section 5.408, *Construction Waste Reduction, Disposal, and Recycling*, of the California Green Building Standards Code (CALGreen section 5.408.1.1) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential

construction operations be recycled and/or salvaged for reuse. The Proposed Project is required to comply with construction and demolition waste prevention and diversion principles set by the District, which strives to exceed the CalGreen waste diversion requirements. Furthermore, in accordance with section 8.108.130 of the Santa Monica Municipal Code, as well as the City's Department of Public Works, applicants for construction or demolition permits involving a covered project shall complete and submit a waste management plan (WMP). Therefore, demolition waste from the Proposed Project would not adversely impact landfill capacity.

According to the 2019 Districtwide Plan for Sustainability, Grant ES generated 229,416 pounds of waste, made up of 169,403 pounds of landfill waste, 50,193 pounds of recyclables, and 9,820 pounds of green waste, and had a diversion rate of approximately 26 percent in FY 2017-2018 (SMMUSD 2019). During the operational phase, the Proposed Project is not anticipated to increase student capacity or introduce a new demand to the region, rather it would continue to serve the existing and future student population at the campus.

Additionally, the school would continue participating in the District's initiatives to increase diversion from landfills. Solid waste would continue to be disposed of at the Chiquita Canyon Sanitary Landfill and the Sunshine Canyon City/County Landfill. The Chiquita Canyon Sanitary Landfill has projected adequate capacity through 2047, and the Sunshine Canyon City/County Landfill, has projected adequate capacity through 2037 (CalRecycle 2019 a, b). The Proposed Project would not substantially increase solid waste in the City and existing landfills have sufficient capacity to accommodate the relatively minor amounts of waste that would be generated by the Proposed Project. Therefore, the Proposed Project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals. Impacts would be less than significant and will not be further analyzed in the EIR. This topic will not be further analyzed in the EIR.

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

Less Than Significant Impact. The District currently complies with federal, state, and local statutes and regulations related to solid waste, and would continue this practice. CALGreen section 5.408, *Construction Waster Reduction, Disposal, and Recycling*, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, impacts would be less than significant and will not be further analyzed in the EIR.

5.20 WILDFIRE

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

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

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

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

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

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

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

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

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

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

Potentially Significant Impact. As stated in Section 5.4, *Biological Resources*, the Grant ES campus is presently developed with an existing school, and ongoing operations greatly reduces the potential for sensitive habitat or species to be present on-site. The campus is in an urban and fully developed area and would not have an impact on the habitat or population level of fish or wildlife species; threaten a plant or animal community; or impact the range of a rare or endangered plant or animal. However, as stated in Section 5.5, *Cultural Resources*, the Proposed Project would require ground disturbing activities within the Grant ES campus during construction of the Proposed Project, which may cause the disturbance of archaeological resources. Excavation to depths

greater than current foundations has the potential to encounter unknown archaeological resources. Additionally, as stated in Section 5.7, *Geology and Soils*, based upon fossils found in similar sediments, the Grant ES campus is potentially sensitive to paleontological resources, and impacts on unique paleontological resources could be potentially significant. Thus, the potential exists for as-yet undiscovered archaeological resources, paleontological resources, or human remains to be encountered during excavation and grading activities. These topics will be further analyzed in the EIR to evaluate potential impacts and formulate any appropriate avoidance (or mitigation) measures, if applicable.

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

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

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

Potentially Significant Impact. Potentially significant impacts are identified in this Initial Study related to aesthetics, air quality, cultural resources, energy, paleontological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, and transportation. Cumulative impacts to the resources for which potentially significant impacts are identified in this Initial Study will be addressed in the EIR. Mitigation measures will be recommended as needed.

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

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

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7. List of Preparers

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Carey Upton, Chief Operations Officer

MASSETTI CONSULTING, LLC

Julian Capata, Facility Improvement Projects
Michael Burke, Design Manager

PLACEWORKS

Addie Farrell, Principal
Arabesque Said-Abdelwahed, Senior Associate
Alen Estrada-Rodas, Associate
Danielle Clendening, Planner
Steve Bush, Senior Engineer
Dina El Chammas, Senior Engineer
John Vang, Senior Associate
Kristie Nguyen, Associate
Cary Nakama, Graphic Designer

Alta Environmental DBA NV5

Architectural Resources Group

Cogstone

John Gust, Ph.D., RPA
Kim Scott, M.S.
Sandy Duarte, B.A.
Kelly Vreeland, M.S.

Converse Consultants

Siva K. Sivathasan, Senior Vice President/Principal Engineer
Edmond V. Babayan, Project Engineer
Mark B. Schluter, Senior Engineering Geologist

7. List of Preparers

IBI Group

Mike Arizabal, Senior Transportation Planner