

Appendix C IS/NOP Comments

Appendices

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**GRANT ELEMENTARY SCHOOL
MASTER PLAN PROJECT IS/NOP**

PUBLIC REVIEW COMMENTS

WRITTEN COMMENTS LETTERS SUBMITTED

#	Commenter	Date Received
Residents		
R1	Joanna Rodriguez -Noyola	February 7, 2023
R2	Yvonna Kawanu	February 7 2023
Organizations		
O1	Emily Archer (Native American Heritage Commission)	January 26, 2023
O2	Evelyn Zhong (California Department of Transportation)	February 6, 2023
O3	Kaitlin Drisco (Santa Monica Conservancy)	February 13, 2023

RESIDENT COMMENTS

Comment R1

COMMENT CARD / TARJETA de COMENTARIO

Scoping Meeting / Reunión de Alcance

Grant Elementary School

February 7, 2023 / 7 de febrero, 2023

Name / Nombre: JOANNA RODRIGUEZ-NOYOLA

Affiliation / Afiliación: NEIGHBOR (HOME OWNER) DISTRICT PARENT, ARCHITECT.

Address / Dirección: 2517 24TH ST.

Comments / Comentarios:

① - Put careful thought of placement of construction and Demo
PORTA-POTTIES IN PARTICULAR.
STAGING & inform neighbors of how long and where they will be placed.
avoid direct adjacency to houses on 24th st. ← PROBLEM IN PAST REND'S!

② PROVIDE A PROPER TURN AROUND AT DEAD-END OF 24TH ST: IN THE FUTURE,
ALL DRIVEWAYS WILL BE REMOVED FROM STREET PER 9.M. DEVELOPMENT STANDARDS
AND THERE IS NO TURN-AROUND, ~~MAKE SURE PARENTS DO NOT DO THIS~~

Written comments must be received no later than February 12, 2023 at the following address:

Los comentarios escritos deben recibirse a más tardar el 12 de febrero, 2023 a la siguiente dirección:

Santa Monica-Malibu Unified School District

1651 16th Street

Santa Monica, California 90404

Attention: Carey Upton - FIP Department

③ → SEE BACK.

② ALL EXISTING BUILDINGS TO REMAIN SHOULD BE EARTH-QUAKE RETROFIT, EVEN THOSE NOT IMPACTED BY THE WORK.

④ MAKE SURE PARENTS CANNOT DO VEHICULAR DROP-OFF ALONG 24TH ST.

⑤ EXPLAIN TO PARENTS HOW AND IF SCHOOL WILL BE OPERATIONAL DURING CONSTRUCTION. I.E. WHERE WILL LIBRARY FUNCTION TAKE PLACE WHILE BUILDING IS BEING RENOVATED.

Comment R2

COMMENT CARD / TARJETA de COMENTARIO

Scoping Meeting / Reunión de Alcance

Grant Elementary School

February 7, 2023 / 7 de febrero, 2023

Name / Nombre:

HONNE KAWANO

Affiliation / Afiliación:

Parent

Address / Dirección:

2663 Centivela Ave.

Comments / Comentarios:

I just want to make sure the carbon imprint is looked into. To try to make zero carbon a goal. Thank you.

Written comments must be received no later than February 12, 2023 at the following address:

Los comentarios escritos deben recibirse a más tardar el 12 de febrero, 2023 a la siguiente dirección:

Santa Monica-Malibu Unified School District

1651 16th Street

Santa Monica, California 90404

Attention: Carey Upton - FIP Department

ORGANIZATION COMMENTS

NATIVE AMERICAN HERITAGE COMMISSION

January 18, 2023

Carey Upton
Santa Monica-Malibu Unified School District
1651 16th Street
Santa Monica, CA 90404

Re: 2023010229, Grant Elementary School Campus Master Plan Project, Los Angeles County

Dear Ms. Upton:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

[AB 52](#)



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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
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Comment O2



*Making Conservation
a California Way of Life.*

February 3, 2023

Carey Upton, Chief Operations Officer
Santa Monica-Malibu Unified School District
1651 16th Street
Santa Monica, CA 90404

RE: Grant Elementary School Campus Master Plan
Project – Notice of Preparation (NOP)
SCH# 2023010229
GTS# 07-LA-2023-04151
Vic. LA Multiple

Dear Carey Upton,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed Project would renovate and modernize the existing campus to develop new and renovated facilities. The plan will be constructed in three phases on the District-owned campus. Redevelopment and modernization of Grant Elementary School includes the demolition and removal of some existing structures, renovation of structures to remain, construction of two new buildings, new and reconfigured playgrounds, and two new and reconfigured parking lots.

After reviewing the NOP, Caltrans has the following comments:

Currently the project is designed in a way that will lead to an overall increase in parking from 62 spaces to 100 spaces. The Lead Agency is encouraged to integrate Traffic Demand Management (TDM) strategies in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more transit-oriented and pedestrian-friendly projects to achieve a high level of non-motorized travel near schools. Caltrans recommends the following to more effectively approach developing physically and environmentally safe commutes to District facilities.

1. Reducing the amount of car parking supplied acts against enabling driving over other methods of transit. Research indicates that removing excess car parking is a proven method of reducing trip demand and encouraging active modes of transportation. If surface parking must be built, it is recommended that it does not face the street directly. With active frontage against the sidewalk and parking shifted to the rear or interior of the site, a streetscape that encourages recreational walking and transit can be produced.

2. Improve connections from schools to existing active transportation and transit infrastructure. This can be done with robust signage near school crosswalks, safety improvements, and human scale amenities. Examples of effective physical design include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, and reductions in crossing distances through roadway narrowing.

3. Implement TDM strategies to reduce school traffic congestion at peak periods as alternatives to requiring car drop-off and pick-up. Infrastructure like frequent stops for school shuttles, skateboard and scooter storage, bicycle parking, and sufficient pedestrian level lighting should be included to encourage these uses. To support a community's ability to choose public transit and active modes of transportation, the plan should consider accessibility options for all impacted by vehicular traffic caused during school hours.

Caltrans would also like to confirm the two primary access points from Pearl Street and 24th Street. Should the new off-street lane for drop-off/pick-up be constructed adjacent to Pearl Street in front of the campus, it is advised that the plan consider the safety conditions for interactions between bicyclists commuting from Santa Monica College, drivers and students during peak arrival and drop-off hours in the morning and afternoon.

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

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2023-04151.

Sincerely,



MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse



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

Comment O3

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

RE: Grant Elementary School Campus Master Plan Project, Initial Study January 2023

The Santa Monica Conservancy recognizes and supports the Santa Monica-Malibu USD efforts to incorporate consideration of historical resources in campus planning through clarification of objectives described in BP7113 and regulations AR7113 adopted in February 2021. It is understood that school facilities need to adapt and evolve to support and optimize current and future education needs; furthermore, it is recognized that historical resources offer unique opportunities, as well as potential constraints, in project planning. We support the District's ongoing investment in time and resources to identify historic resources and incorporate them, as possible, into campus planning under the *Secretary of the Interior's Standards for Treatment of Historic Properties (the "Standards")*. Such investment will benefit student learning and strengthen our community's sense of place and connection to history.

The Grant Elementary School Historic Resource Inventory Draft Report ("HRI") prepared by Architectural Resources Group dated January 28, 2022 provides excellent information about the history and evolution of the physical facilities and identifies a potential historic district. The Santa Monica Conservancy anticipates that the information in this report will become the baseline for the definition of cultural resources to be addressed in the EIR. The Santa Monica Conservancy has the following comments to offer for the Initial Study on the Grant Elementary School Campus Master Plan Project dated January 2023, to be addressed in the EIR.

Rehabilitation of Historic Buildings

We support the elements of the current project that seek to adapt and reuse buildings identified as within the potential historic district including the new library and restoration of the historic central courtyard. Adaptive reuse is a good long-term strategy for sustainable historic preservation. In addition, the proposed two-story new infill construction at the west is also sensitively aligned to include retention of the sheltered, semi-interior corridor network and is compatible in massing to retain the character of light and openness for the restoration of the historic courtyard.

We propose that such adaptive reuse, rehabilitation and maintenance of the remaining existing historic resources within the historic district is an integral part of overall campus planning. The HRI identifies the potential historic district and provides an analysis of the character defining features and, furthermore, the implementation of the rehabilitation projects to adapt and modernize buildings within the historic district would conform to the *Secretary of the Interior's Standards for Rehabilitation* as the applicable treatment standard. Implementing these modernization projects in conjunction with designers and engineers experienced with the application of the Standards provides creative opportunities to guide the design and apply the District's educational specifications within the framework of existing buildings to meet educational goals for the 21st century.

Rehabilitation is essential for these buildings to remain a functional and active part of the overall educational program, as classrooms migrate to new classroom buildings elsewhere on the campus. The potential adverse impact of relocating classrooms from the original historic buildings to new buildings should include a rehabilitation program as mitigation.

Sincerely,

Ruthann Lehrer and Nina Fresco, Santa Monica Conservancy Board Members

Kaitlin Drisko, Co-Executive Director Santa Monica Conservancy