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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Roosevelt Elementary School Campus Plan Project

Initial Study

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

SEPTEMBER 2023

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Prepared by:

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September 2023

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ACRONYM LIST

AB	Assembly Bill
ALUC	Airport Land Use Commission
amsl	above mean sea level
APN	Assessor's Parcel Number
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
BMP	best management practices
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEI	Continuous Energy Improvement Program
CEQA	California Environmental Quality Act
CNEL	community noise equivalent level
CREST	child care, recreation, enrichment, sports together
District	Santa Monica-Malibu Unified School District (also SMMUSD)
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
ECHO	Enforcement and Compliance History Online
EI	expansion index
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FIRM	Flood Insurance Rate Map
FY	fiscal year
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
HRI	Historic Resources Inventory

IS/MND	Initial Study/Mitigated Negative Declaration
K	kindergarten
LED	light-emitting diode
LID	low-impact development
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MND	Mitigated Negative Declaration
MS4	Storm Drain Municipal Separate Storm Sewer System Permit
ND	Negative Declaration
NPDES	National Pollutant Discharge Elimination System
PCB	polychlorinated biphenyls
PDT	Pacific Daylight Time
PL	Public Lands Zoning District
PM	particulate matter
PM_{10}	particulate matter 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter 2.5 micrometers or less in diameter
ppd	pounds per day
PST	Pacific Standard Time
PWA	Public Works Administration
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SF	square feet
South Coast AQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SMFD	(City of) Santa Monica Fire Department
SMMC	(City of) Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Unified School District (also District)
SMPD	(City of) Santa Monica Police Department
SMURRF	Santa Monica Urban Runoff Recycling Facility
SoCalGas	Southern California Gas Company
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TK	transitional kindergarten
USEPA	US Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VEC	vapor encroachment condition
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
WPA	Works Progress Administration

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1.0 INTRODUCTION

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1.0 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

The Santa Monica-Malibu Unified School District (SMMUSD or District) performed a facilities assessment of Roosevelt Elementary School in order to update the campus to align with its Educational Specifications, which the SMMUSD Board adopted in 2019. The assessment identified priority and future improvements to be implemented, which provided the basis for the long-range *SMMUSD Roosevelt Elementary School Campus Assessment, Planning and Design Final Report* (November 20, 2020) (Campus Plan). The components of the proposed Roosevelt Elementary Campus Plan Project (Proposed Project) consist of removing and demolishing 6 buildings and 12 portables, constructing 5 new buildings and 1 building addition, and renovating 3 buildings and outdoor areas on the existing school campus. The plan also creates new green spaces for outdoor learning and play in areas that are currently paved or part of a building footprint. Additionally, a security gate would be installed at each school entry point to control access.

Implementation of the Campus Plan would not increase the capacity of Roosevelt Elementary School, nor would the attendance boundaries change. The District intends to move forward with the Proposed Project's improvements and requires California Environmental Quality Act (CEQA) clearance beforehand.

The SMMUSD is the lead agency with principal responsibility for carrying out the Proposed Project. The District, as lead agency, is responsible for preparing environmental documentation in accordance with CEQA to determine if the Proposed Project would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an Initial Study (IS) is prepared primarily to provide the lead agency with information to use as the basis for determining whether an environmental impact report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the Proposed Project. This IS prepared for the Proposed Project determined that preparation of an EIR was appropriate, pursuant to CEQA requirements.

1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. Based on this and as mentioned above, the SMMUSD is the lead agency for the Proposed Project.

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of the Initial Study (IS) is to evaluate the potential environmental impacts of the Proposed Project. This document is divided into the following sections:

- **1.0 Introduction** – This section provides an introduction and describes the purpose and organization of the document.

- **2.0 Project Information** – This section provides general information regarding the Proposed Project, including the Proposed Project name, lead agency and address, contact person, brief description of the Proposed Project's location, General Plan land use designation and zoning district, identification of surrounding land uses, and identification of other public agencies whose review, approval, and/or permits may be required.
- **3.0 Project Description** – This section provides a detailed description of the Proposed Project.
- **4.0 Environmental Checklist** – This section describes the environmental setting and overview for each of the environmental issue areas, and analyzes the potential environmental effects of implementing the Proposed Project.
- **5.0 References** – This section identifies documents, websites, people, and other sources consulted during the preparation of this IS.

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

Section 4.0, Environmental Checklist, includes an analysis of 21 environmental issue areas, including CEQA Mandatory Findings of Significance, based on Appendix G of the CEQA Guidelines. The environmental issue areas that are analyzed in this IS, numbered 1 through 21, consist of the following:

1. Aesthetics
2. Agriculture and Forest Resources
3. Air Quality
4. Biological Resources
5. Cultural Resources
6. Energy
7. Geology and Soils
8. Greenhouse Gases
9. Hazards and Hazardous Materials
10. Hydrology and Water Quality
11. Land Use and Planning
12. Mineral Resources
13. Noise
14. Population and Housing
15. Public Services
16. Recreation
17. Transportation
18. Tribal Cultural Resources
19. Utilities and Service Systems
20. Wildfire
21. Mandatory Findings of Significance

Each environmental issue area is organized in the following manner:

- The **Overview** summarizes the existing conditions at the regional, subregional, and local levels, as appropriate, and identifies applicable plans and technical information for the particular issue area.
- The **Checklist Discussion/Analysis** provides a detailed discussion of each of the environmental issue checklist questions based on Appendix G of the CEQA Guidelines. The level of significance for each topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are evaluated in this IS
    - **No Impact:** No Project-related impact to the environment would occur.

- **Less than Significant Impact:** The impact would not exceed the applicable significance thresholds.
- **Less than Significant Impact with Mitigation Incorporated:** The Project, with the incorporation of mitigation measures, would not cause any impacts that would exceed the applicable significance thresholds.
- **Potentially Significant Impact:** The impact is considered potentially significant if the Proposed Project has the potential to exceed identified significance thresholds of an environmental issue area. An EIR for the Project will include additional evaluation of the impact and mitigation measures to reduce impacts to a less than significant level, where feasible.

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2.0 ENVIRONMENTAL SETTING

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2.0 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

Roosevelt Elementary School is located at 801 Montana Avenue (north of Lincoln Boulevard and Montana Avenue intersection) in the City of Santa Monica, California. The Proposed Project's site is located approximately 1.3 miles northwest of Interstate 10, approximately 3.5 miles southwest of Interstate 405, and approximately 0.65 miles northeast of Santa Monica State Beach and the Pacific Coast Highway.

The main school campus is bordered by 9th Street to the east/northeast; Montana Avenue to the south/southeast; Lincoln Boulevard to the west/southwest; and Alta Avenue to the north/northwest. Vehicular access into the site is provided via 9th Street. Refer to **Figure 2-1A, Regional Vicinity Map,** and **Figure 2-1B, Local Vicinity Map.**

2.2 SURROUNDING LAND USES

The Roosevelt Elementary School campus is generally located in an urbanized residential area within the City of Santa Monica, with land uses trending to commercial retail, office, and mixed-use development to the southwest/southeast. Residential uses surround the campus to the west, north, and east and include a mix of single-family and multifamily residential structures. To the southwest/southeast along Montana Avenue are generally small-scale commercial retail uses, including shops, services, restaurants, and office space. A large retail grocery store is located to the southeast. Similar established commercial retail uses, combined with single-family and multifamily residential uses, are present farther to the southwest/southeast beyond Montana Avenue.

Other schools that are part of the SMMUSD in the local area include Lincoln Middle School, located at 1501 California Avenue, approximately 0.5 miles to the east, and Franklin Elementary School, located at 2400 Montana Avenue, approximately 1.14 miles to the northeast. Goose Egg Park, a public park, lies approximately 0.12 miles to the southwest. The Pacific Ocean is located approximately 0.85 miles to the west/southwest.

2.3 GENERAL PLAN AND EXISTING ZONING

The City of Santa Monica General Plan designation for the Roosevelt Elementary School campus is Institutional/Public Lands. The existing zoning for the campus is Institutional/Public Lands. Refer to **Figure 2-2a, Existing General Plan Land Use**, and **Figure 2-2b, Existing Zoning**. Pursuant to the City of Santa Monica Municipal Code, permitted uses include public or semi-public facilities, including municipal offices, schools, libraries, museums, performance spaces, cemeteries, corporation yards, utility stations, and similar uses. The zoning designation is consistent with the General Plan Land Use and Circulation Element's Institutional/Public Lands land use designation.

The campus is not located within the Coastal Zone. Therefore, the Proposed Project is not subject to a coastal development permit from the California Coastal Commission.

2.4 EXISTING CONDITIONS

The Roosevelt Elementary School campus is approximately 6.5 acres in size with a total existing building area of approximately 56,461 square feet. The campus currently supports approximately 45,661 square feet of permanent building area and 10,800 square feet of relocatable building area.

Roosevelt Elementary School currently serves transitional kindergarten (TK) through fifth grade. The campus was originally constructed in 1935, with subsequent improvements and additions occurring over the following decades. Under existing conditions, the school campus supports 9 permanent buildings; 12 portable classrooms; an athletic field; athletic courts and playground space; common space and courtyards; and artwork. Refer to **Table 2-1A, Existing Campus Buildings,** and **Table 2-1B, Existing Recreational Facilities/Common Space**. **Figure 2-3, Existing Campus Facilities** and **Figures 2-4a** and **2-4b, Photographs - Existing School Campus**, illustrate the existing setting on the school grounds.

The primary entrance is located along Montana Avenue near the administration offices housed in Building J. However, Buildings D (cafeteria) and H (auditorium), located along Lincoln Boulevard in the southwestern portion of the site, historically created the primary entrance to the school campus. Administrative offices, along with classrooms, are located in Building J in the south-central portion of the property. The TK and kindergarten classrooms are located in the northeastern portion of the site in Building K, near the corner of 9th Street and Montana Avenue. Portable classrooms are provided in various locations within the campus.

On-site parking for the school is provided via a surface lot located in the northeastern portion of the campus, with access from 9th Street. The lot has 48 parking spaces available for staff and visitors.

Common open spaces for gathering and recreational activities include the South Courtyard, which is located between Buildings E, G, and J and has a large swath of grass and several planted areas. The North Courtyard is located between Buildings B, C, and E and similarly offers a large swath of grass and planted areas. The Lincoln and Montana Quad on-site also provides common open space and is located in the southwestern portion of the campus, near the intersection of Montana Avenue and Lincoln Boulevard. The quad is characterized by large swaths of lawn with several mature trees. This lawn is on the school property but is outside of the school fence and typically used by the community.

Active recreational facilities are generally located in the northern portion of the site and include a U8 soccer green and track (athletic field), two basketball/tennis courts, and three handball walls. Playgrounds with children's play equipment are located in the eastern portion of the site, adjacent to Building K, as well as in the northwest portion of the site, adjacent to the basketball/tennis and handball courts. A kickball field is located in the north-central portion of the site on the playground. A number of shade structures are located within the outdoor play areas to provide relief. Other features include a planter garden with various herbs and flowers, next to Building K. Refer to **Table 2-1B, Existing Recreational Facilities/Common Space**.

The existing recreational facilities at the school are available for community use through the Civic Center Act and master Facility Use Agreements between the District and the City of Santa Monica. Events

permitted may include community and/or City use of the athletic field, auditorium, classrooms, and common areas. Such events would occur when the school is not in use and school-sponsored or other District-related events are not scheduled.

The school currently operates from 8:00 a.m. to 3:00 p.m. Staff and students typically arrive on campus between approximately 7:00 a.m. and 8:00 a.m. and leave between approximately 3:00 p.m. and 5:00 p.m. Some programmed on-campus activities, which may include child care, recreation, enrichment, sports together (CREST) and School Age Programs, which provides morning care and afterschool childcare, do occur outside of normal school operating hours, typically before school and afterschool until 6:00 p.m.

Under current conditions, school facilities for community use typically occur following the end of operation hours at the school, which is generally after 3:00 p.m. during the week and after 8:00 p.m. on weekends. Activities taking place indoors generally cease by 9:00 p.m.; however, some events are permitted to occur until 10:00 p.m. All events held outdoors cease by sunset both during the week and on weekends.

TABLE 2-1A EXISTING CAMPUS BUILDINGS

Building Name	Year Built	Current Use	Building Square Footage	Building Type	Building Height (approx.)	Number of Stories
A	1968[1]	Library/Classrooms	14,379	Permanent	25′-0″	2
B	1940	Classrooms	3,915	Permanent	16′-6″	1
C	1940[2]	Classrooms	5,197	Permanent	16′-6″	1
D	1951	Cafeteria	4,405	Permanent	20′-8″	1.5
E	1935	Classrooms	4,861	Permanent	16′-6″	1
G	1935	Classrooms	1,054	Permanent	16′-6″	1
H	1951	Auditorium	4,963	Permanent	24′-0″	1.5
J	1935	Offices/Classroom	4,435	Permanent	16′-6″	1
K	1935[3]	Kindergarten	2,452	Permanent	16′-6″	1
--	Unknown	Classrooms	10,800 total (12 at 900 SF each)	Portable	14 ft	1

Source: HRG 2022; dsk 2023

1. Building was expanded with an addition constructed in 2000.
2. Building was expanded with additions constructed in 1951 and 1968.
3. Building was expanded with an addition constructed in 1951.

TABLE 2-1B EXISTING RECREATIONAL FACILITIES/COMMON SPACE

Year Built	Current Name
1930s/2000s	Tennis/Basketball Courts
c. 1970s	Handball Court
c. 2000s	Athletic Field
1935	South Courtyard
1935	North Courtyard
1935	Lincoln & Montana Quad

Source: HRG 2022

2.4.1 BUILDINGS

BUILDING A (LIBRARY/CLASSROOM)

Building A is located along Lincoln Boulevard in the western portion of the campus. The building was constructed in 1968, is two stories in height, rectangular in plan, and surfaced in smooth stucco with a flat roof and metal coping. An addition was constructed in 2000 along the north elevation. Fenestration consists of bands of awning steel-frame and fixed windows. Metal slab doors, occasionally flanked by fixed sidelight windows, provide entry.

The southern portion of Building A supports three slightly projecting bays along the west elevation with grouped awning steel-frame windows. Large single-light windows with metal awnings are present along the northern portion of the structure. The building features a second story balcony along the east elevation with protective metal balustrade positioned above a covered corridor, which is upheld by thin metal posts. The second level is accessed via a centrally located staircase and elevator.

BUILDING B (CLASSROOMS)

Constructed in 1940, Building B was designed by architect Joe M. Estep with support of the Works Progress Administration (WPA). The structure is located east of Building A and west of Building C, and is connected to Buildings D and C via a series of canopied outdoor corridors with a flat roof and wide eaves upheld by steel pipe columns. Building B is one story in height and is surfaced in smooth stucco and capped by a flat roof with metal coping. The structure offers grouped awning steel-frame windows set above a metal bulkhead, with entrances consisting of steel slab doors flanked by awning windows and set beneath fabric awnings. Concrete patios at the building entrances are present along the south elevation, interspersed with plantings. The southern elevation faces onto the North Courtyard.

BUILDING C (CLASSROOMS)

Building C was constructed in 1940 and designed by architect Joe M. Estep with support of the WPA. The structure is located along 9th Steet, east of Building B, and is connected to Buildings B and E via a series of canopied outdoor corridors with a flat roof and wide eaves upheld by steel pipe columns. The building is one story in height, clad in smooth stucco, and features a flat roof with metal coping. Fenestration is composed of grouped awning steel-frame windows; entryways are single-glazed and metal slab doors are flanked by awning windows. Concrete patios are present along entrances on the east elevation. A wide canopy, which faces onto the athletic field and rear paved area, is present along the west elevation. The building was expanded with additions constructed in 1951 and 1968.

BUILDING D (CAFETERIA)

Building D was constructed in 1951 and designed by architect Joe M. Estep, and is located north of Building H along Lincoln Avenue. Buildings D and H historically created the primary entrance to the school. The structure is 1.5 stories in height and is clad in smooth stucco and capped by a flat roof with metal coping. Fenestration is composed of grouped awning steel-frame windows, and entryways feature single metal glazed doors with transoms and sidelights, accessible via stairs and a concrete ramp from Lincoln Boulevard. A wall wraps around the side of the building, separating the stair from the ramp. Two horizontal beams that span Buildings D and H, upheld by squared columns with horizontal scoring, comprise the entrance gate.

BUILDING E (CLASSROOMS)

Building E was constructed in 1935 and designed by architects Marsh, Smith, and Powell. The structure is located south of Building B and north of Building G, and is connected to Buildings D, B, and G via a series of canopied outdoor corridors with a flat roof and wide eaves upheld by steel pipe columns. The structure is one story in height and is clad in smooth stucco and capped by a flat roof with metal coping. Fenestration is composed of grouped awning steel-frame windows set above metal bulkheads; some windows are set beneath flat canopies with horizontal scoring. Entryways are steel slab doors flanked by awning windows and set beneath fabric awnings. Brick patios are present at entryways along the south elevation, with plantings interspersed. The south elevation faces onto the South Courtyard. A projecting corridor with a flat roof is located along the north elevation.

BUILDING G (CLASSROOMS)

Located between Buildings E and J in the central portion of the school campus, Building G was constructed in 1935 and designed by architects Marsh, Smith and Powell. The building is one story in height, clad in smooth stucco, and capped by a flat roof with metal coping. Windows are grouped awning steel-frame windows, and entrances display single and double metal slab doors. The building faces north onto the South Courtyard is connected to Buildings H, J, and K via a series of canopied outdoor corridors with a flat roof and wide eaves upheld by steel pipe columns.

BUILDING H (AUDITORIUM)

Building H was constructed in 1951 by architect Joe M. Estep. Buildings H and D historically created the primary entrance to the school. The building is located south of Building D along Lincoln Avenue, is 1.5 stories in height, and is clad in smooth stucco and capped by a flat roof with metal coping. Fenestration is composed of grouped awning steel-frame windows, and entryways are single and double metal slab doors, which are accessible via stairs and a concrete ramp from Lincoln Boulevard. Two horizontal beams that span Buildings D and H, upheld by squared columns with horizontal scoring, comprise the entrance gate. The south elevation faces onto the Lincoln and Montana Quad.

BUILDING J (OFFICES/CLASSROOM)

Building J was constructed in 1935 and designed by architects Marsh, Smith, and Powell. The structure is located east of Building H and is connected to Buildings G, H, and K via a series of canopied outdoor corridors with a flat roof and wide eaves upheld by steel pipe columns. The building is one story in height and is clad in smooth stucco and capped by a flat roof with metal coping. Fenestration is composed of grouped awning steel-frame windows, and entrances are single metal slab doors flanked by awning steel-frame windows, typically set beneath fabric awnings.

BUILDING K (TK AND KINDERGARTEN)

Building K was constructed in 1935 and designed by Marsh, Smith, and Powell. An addition was constructed in 1951 along the southeast elevation and a canopied corridor was added at that time. The structure is located in the southeastern portion of the campus, east of Building J, and is one story in height with an L-shaped plan. The building is connected to Buildings J and G via a series of canopied outdoor corridors with a flat roof and wide eaves upheld by steel pipe columns. The north elevation supports a wide canopy facing the planter garden. The building is clad in smooth stucco, capped by a flat roof with metal coping, and supports fenestration composed of grouped awning steel-frame windows. Entrances to the building are generally metal slab doors.

2.4.2 FEATURES

LINCOLN AND MONTANA QUAD

This open space dates to the early development of the campus (circa 1935) and is located in the southwestern region of the campus, near the intersection of Montana Avenue and Lincoln Boulevard. The quad is characterized by large swaths of lawn with several mature trees. This area is located outside of the campus's fencing and is utilized by the community.

SOUTH COURTYARD

This open space dates to the early development of the school campus (circa 1935) and has been modified over time. Located between Buildings E, G, and J, the South Courtyard has a large swath of grass, several mature trees, and shrubs, as well as several planted areas between the brick patios of Building E and the original brick flagpole ring.

NORTH COURTYARD

The North Courtyard dates to the construction of Building B in 1940 and is located between Buildings B, C, and E. The courtyard has a large swath of grass, several mature trees, and shrubs, as well as planted areas between the concrete patios of Building B.

BRICK FLAGPOLE RING

The brick flagpole ring is located in the South Courtyard and dates to early development of the campus (circa 1935). The ring measures approximately 2 feet in diameter and originally surrounded the flagpole located in the courtyard.

BRICK WALL

A low brick wall, approximately one foot in height, is located in the northern portion of the campus next to the tennis courts. The wall was constructed during early development of the campus (circa 1935).

TENNIS/BASKETBALL COURTS

The tennis/basketball courts were originally constructed in the 1930s and subsequently improved in the 2000s. There are two outdoor hard courts, surrounded by metal chain link fencing.

HANDBALL COURTS

The handball courts consist of three concrete handball courts and walls, constructed in the 1970s. The courts are located between the tennis/basketball courts and Building A.

PLANTER GARDEN

The planter garden was installed in the 2000s. Located next to Building K, the planters are made of wood and exhibit various herbs and flowers.

ATHLETIC FIELD

The athletic field was installed in the 2000s and is located in the northern region of the campus. The field consists of turf and dirt.

2.4.3 ADDITIONAL FEATURES

"THEODORE ROOSEVELT" PANEL

This stone relief panel was completed by the WPA and installed during the school's expansion in 1935. The panel depicts Theodore Roosevelt on a horse next to a train and two lions, recounting his travels.

WPA BRONZE PLAQUE

This bronze plaque was installed in 1940 during the school's expansion. The plaque was completed by the WPA.

ROOSEVELT CLOCK

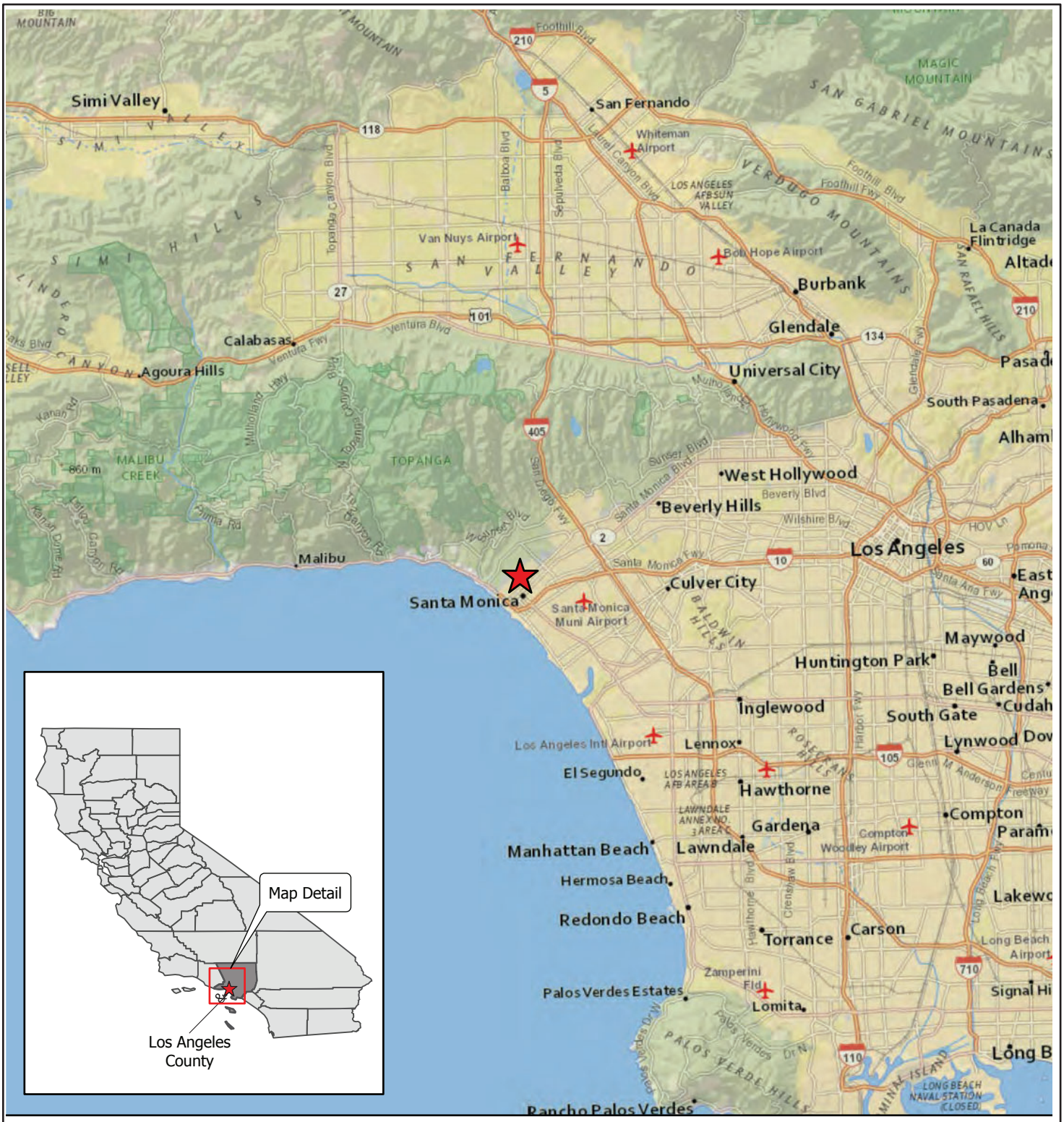
The Roosevelt Clock was installed on the campus by the class of 2006. The clock is located in the northern portion of the campus.

"ROOSEVELT" MURAL

The "Roosevelt" mural was designed in the 2000s and commemorates the school's founding and historical events. The painted mural extends across several buildings, including Buildings H, J, and one portable building.

"CLASS" MURAL

This mural was designed in the 2000s by several school classes. The painted mural depicts themes along the side of Building A.



Project Location

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Regional Vicinity Map

Figure 2-1A

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File: 195838Figures.indd

0 2.5 5 10 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Santa Monica, California*

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ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

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File: 195838Figures.indd

Not to Scale

Source: Google Earth, 2023

Local Vicinity Map

Figure 2-1B

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File: 195838Figures.indd

Project Boundary

Not to Scale

Source: Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, County of Los Angeles, California Stte Parks, ©OpenStreetMap, Microsoft, Esri.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Existing General Plan Land Use

Figure 2-2A

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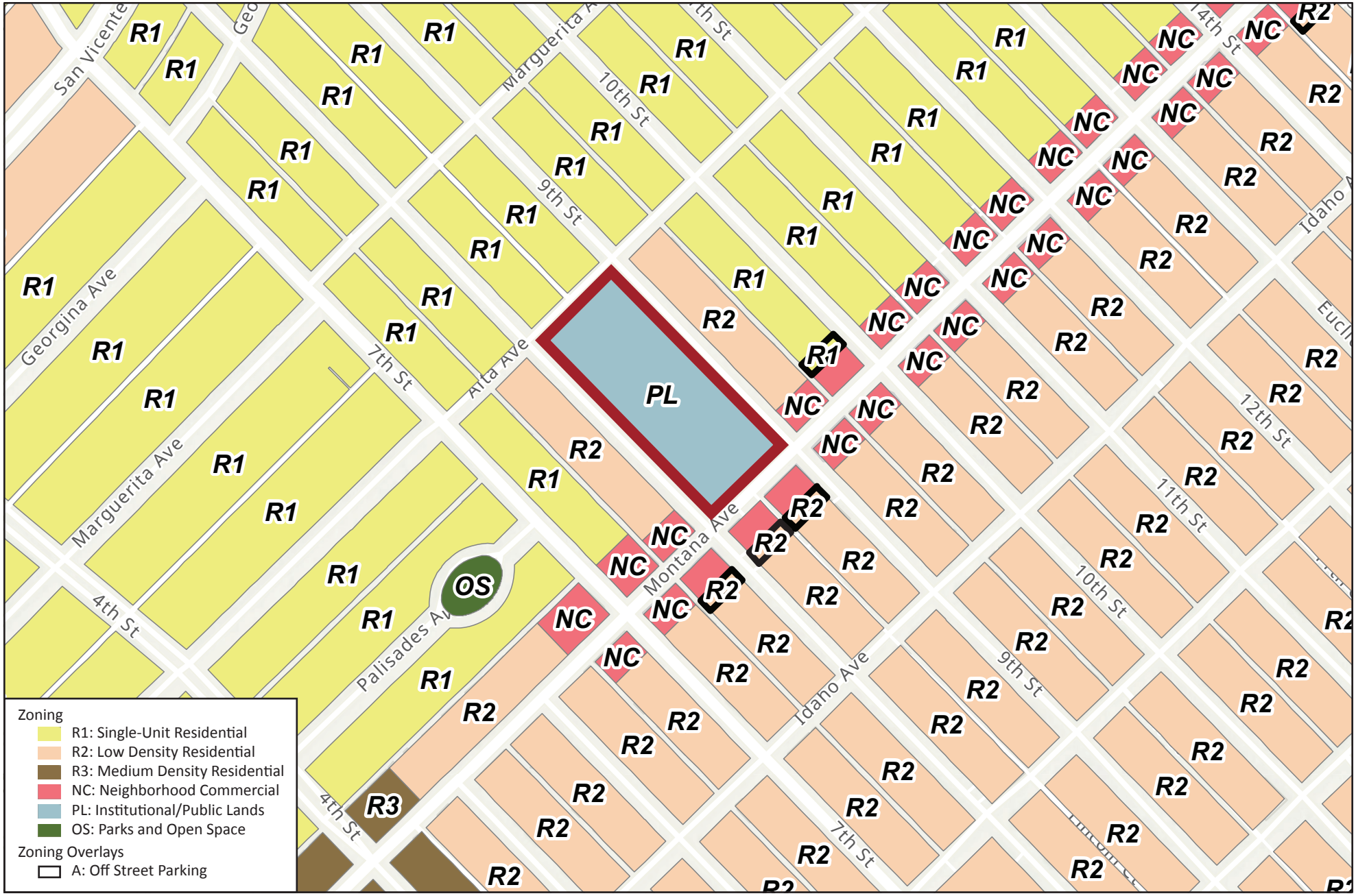

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File: 195838Figures.indd

Project Boundary

Not to Scale

Source: Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, County of Los Angeles, California Stte Parks, ©OpenStreetMap, Microsoft, Esri.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Existing Zoning

Figure 2-2B

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T = Existing Restrooms

**Note that the "quad" areas are referred to as "courtyards" in the Initial Study discussions.*

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File: 195838Figures.indd

Not to Scale

Source: dsk architects, 2020

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Existing Campus Facilities

Figure 2-3

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Building A - South View

Building D - North View

Building B - North View

Building E - Northeast View

Building C - Southwest View

Building G - West View

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

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Photographs - Existing School Campus

Source: Historic Resources Group, 2022

Figure 2-4A

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Buildings D and H - Entrance Courtyard

Lincoln and Montana Quad - North View

Buildings H and J - North View

South Courtyard - East View

Building K - East View

North Courtyard - Southwest View

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

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File: 195838Figures.indd

Photographs - Existing School Campus

Source: Historic Resources Group, 2022

Figure 2-4B

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2.5 STUDENT ENROLLMENT

Under existing conditions (2022-2023 school year), the current enrollment at the elementary school is 594 students. Enrollment numbers were at their highest during the 2014-2015 school year with a student population of 831. Over the past decade, student enrollment has decreased and was at its lowest during the 2021-2022 school year with a student population of 589. Refer to **Table 2-2, Student Enrollment by Grade Level**.

TABLE 2-2 STUDENT ENROLLMENT BY GRADE LEVEL

Grade	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023
Kindergarten	122	131	135	137	142	135	107	102	121
1st Grade	128	116	123	127	112	118	105	84	80
2nd Grade	152	127	114	124	133	123	106	87	85
3rd Grade	128	148	134	113	116	135	112	101	93
4th Grade	151	132	147	140	119	123	127	103	110
5th Grade	150	144	141	147	141	121	115	112	105
Total	831	798	794	788	763	755	672	589	594

Source: California Department of Education 2023

The improvements currently being proposed at Roosevelt Elementary School would increase neither the capacity of the campus nor student enrollment. Rather, such improvements are intended to achieve SMMUSD goals and objectives as identified in the 2019 SMMUSD *Education Master Plan*.

2.6 CAMPUS HISTORY

The current Roosevelt Elementary School campus was initially constructed during the mid-1930s, shortly after the Long Beach earthquake of 1933. In the 1940s, additional development was undertaken on the site with support of the WPA. Between 1935 and 1940, funding provided by the federal Public Works Administration (PWA) and WPA, along with local funds, allowed for much of the reconstruction activity that occurred on the school grounds (HRG 2022).

The original Roosevelt Elementary School campus (1907) was located at 6th Street and Montana Avenue. However, the school facilities were severely damaged during the Long Beach earthquake. Following the earthquake, the campus was demolished and rebuilt at its current location in 1935. The current campus was designed by the master Los Angeles architectural firm Marsh, Smith and Powell. Architectural features on the school's buildings display the smooth surfaces, curved corners, and horizontal banding emblematic of buildings constructed under the support of the WPA and PWA, an architectural style commonly referred to as the PWA Moderne style (HRG 2022).

The design of the campus features the integration of indoor and outdoor spaces, along with concrete patios located adjacent to classroom wings. This new design approach was reflective of the new "Santa Monica Plan" developed by the architects, which was intended to meet the requirements of the new state construction code (which required new seismic building standards) as well as be more modern. This new approach was formulated between architects and educators from the Santa Monica district and involved buildings that were planned and designed for safety, future expansion, and activity programs in rooms adaptable to such procedures. The Santa Monica Plan was acknowledged as introducing a new trend in educational procedure that provided functional teaching spaces, child-centered buildings, and plentiful outdoor play areas (HRG 2022).

Development on the school campus continued into the 1940s with buildings designed by architect Joe M. Estep with support of the WPA. The earlier phases of construction located the campus in the southcentral region of the subject parcel and resulted in PWA Moderne-style buildings on a finger-plan school plant. During the 1930s and early 1940s, on-site buildings were designed with the new Moderne buildings, with a specific focus on improving the ability of structures to withstand seismic activity (HRG 2022).

Development on-site following World War II was focused in the western portion of the campus. Estep designed several buildings in 1951 that reoriented the primary entrance to the school to Lincoln Boulevard. The original cafeteria was demolished, a new library was built, and a classroom was expanded in 1968. A number of permanent buildings, temporary buildings, and support structures were added in the 1990s in an ad hoc manner to address increased demand for new facilities, accommodate a growing student population, and meet educational needs (HRG 2022).

2.7 HISTORICAL RESOURCES

In February 2021, the SMMUSD adopted Board Policy 7113 and accompanying Administrative Regulation 7113, which were aimed at identifying and treating the District's historical resources on its school sites. As a result, the District requires preparation of a historical resources inventory (HRI) prior to approval of a master plan or design of a school facilities project on a school site in the SMMUSD. The HRI is intended to document existing conditions of a school site and to evaluate potential historic resources that may be present and may therefore require consideration under CEQA.

As described in the HRI prepared by Historic Resources Group (HRG 2022) for Roosevelt Elementary School, certain buildings and features on the school campus were considered on a collective basis for potential eligibility of listing at the national, state, and local levels as a historic district. As defined by the National Park Service, a historic district is "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (HRG 2022). School campuses are considered to represent a notable example of a potential historic district as they often include definable spaces and unified site plans constructed as institutional complexes that offer a combination of space and purpose, interconnectedness, and functionality as a larger grouping. As the Roosevelt Elementary School campus offers a grouping of related buildings and features developed as an elementary school, the site was considered for its potential to represent a historic district (HRG 2022).

Based on the findings of the evaluation, the HRI identified a potential historic district on the school campus that is eligible for listing in the California Register of Historic Resources and for designation by the City of Santa Monica as a historic district (HRG 2022). The potential historic district is composed of 6 contributing buildings, 5 site features, and 2 additional features, ranging in date from 1935 to 1940. Elements contributing to the potential historic district are listed below in **Table 2-3, Features in the Historic District**. All other buildings and features on the school campus were determined to be ineligible for listing at the federal, state, and local levels. **Figure 2-5, Potential Historic District Map**, shows the location of the contributing buildings, site features, and additional features to the potential historic district, along with the district boundary. Refer to Section 4.5, Cultural Resources, for a more in-depth discussion.

TABLE 2-3 FEATURES IN THE HISTORIC DISTRICT

Current Feature Name	Year Built	Integrity	Status
Buildings			
Building B	1940	Good	Contributor
Building C	1940	Good	Contributor
Building E	1935	Good	Contributor
Building G	1935	Good	Contributor
Building J	1935	Good	Contributor
Portion of Building K	1935	Good	Contributor
Site Features			
Lincoln & Montana Quad	1935	Good	Contributor
South Courtyard	1935	Good	Contributor
North Courtyard	1940	Good	Contributor
Brick Flagpole Ring	1935	Good	Contributor
Brick Wall	1935	Good	Contributor
Additional Features			
Theodore Roosevelt Panel	c. 1935	Very Good	Contributor
WPA Bronze Plaque	1940	Very Good	Contributor

Source: HRG 2022

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*Note that the "quad" areas are referred to as "courtyards" in the Initial Study discussions.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Potential Historic District Map

Figure 2-5

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Source: Historic Resources Group, 2022

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3.0 Project Description

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3.0 PROPOSED PROJECT DEVELOPMENT

3.1 PROJECT BACKGROUND

Santa Monica-Malibu Unified School District (SMMUSD or District) is the process of updating its school facilities, replacing aging and inadequate buildings, and modernizing educational spaces to support twenty-first century learning. In April 2019, SMMUSD Board adopted Districtwide Educational Specifications that provide guidance on developing future learning environments to support new developments in technology and the expectations of the twenty-first century workforce. Preparing students for twenty-first century means developing their executive functions, including teaching children to work collaboratively and to explore, adapt, and work with problems that do not always have clear definitions or borders. The Educational Specifications shift the past instructional design from teacher-driven instruction to student-driven learning. This includes a shift from a traditional teacher-at-the-front-of-the-classroom style of learning to one that provides for rotational learning in the classroom and throughout the campus, incorporating a variety of project-based learning experiences that allow for individualized, small group, and large group instruction to occur simultaneously. Learning spaces need to be adapted for enhanced flexibility, mobility, and access to technology and resources, where instructors and students may shift seamlessly between programs and instructional opportunities.

Construction began on the Roosevelt Elementary School campus in 1935. The majority of buildings are approaching ninety years old and were constructed for another type of education. In consideration of the school's historic value, the Proposed Roosevelt Elementary School Campus Plan Project (Proposed Project) balances the preservation of the school's historical character with the District's needs for larger classrooms, new extracurricular facilities, and adequate support infrastructure. The Educational Specifications describe teaching and learning spaces with the following approaches in the Proposed Project's activities:

- Larger classrooms at 1,200 square feet to support project and teaming-based learning.
- Teaming spaces to allow teachers to arrange for multiple-classroom collaborative projects, and to support projects that need a large space.
- Maker spaces to house the tools and specialty spaces needed to support messy, elaborate projects that would not be possible even in an expanded classroom. These spaces may serve as an art studio, science lab, model building shop, robot factory, or many other functions by rearranging the moveable furniture.
- Larger multipurpose spaces in the auditorium, cafeteria, library, etc., with expanded functions to allow for project-based and integrated approaches to learning, such as culinary education, performance/motion/physical education, and indoor-outdoor learning opportunities.
- Outdoor learning spaces – programmed outdoor learning environments better integrated and connected with indoor learning spaces.

- Additional parking to meet identified shortages for the school's existing needs.

3.2 PROPOSED CAMPUS PLAN PROJECT

The Proposed Project would preserve the historic quality and character of the school. The Proposed Project would maintain the original South Courtyard area in the center of the campus and the core buildings, and the same spatial relationships between the structures.

The Proposed Project's components consist of removing and demolishing six buildings and 12 portables, constructing five new buildings and one building addition, and renovating three buildings and outdoor areas on the existing school campus. The plan also creates new green spaces for outdoor learning and play in areas that are currently paved or part of the building footprint. Additionally, each school entry point would include a security gate to control access.

The Proposed Project would be implemented over five phases, which would occur at the District's discretion when funding becomes available. Implementation of the Proposed Project would not increase the capacity of Roosevelt Elementary School and would not change the attendance boundaries.

The proposed changes in the campus building area are presented in **Table 3-1** and shown on **Figure 3-1**.

TABLE 3-1. SUMMARY OF PROPOSED PROJECT'S TOTAL DEVELOPMENT

Campus Area	Status	Existing Features	Final Conditions (Existing to Remain and Proposed Campus Plan)	Maximum Height
Phase 1				
Transitional-Kindergarten (T-K)/ Kindergarten and Outdoor Play Areas	Demolition of Existing and New Construction	2,425 SF (1,365 SF and 1,060 SF)	11,050 SF (seven classrooms at 1,350 SF/classroom and 1,600 SF teacher workroom & restrooms)	32 feet
Library	New Construction	2,639 SF	5,000 SF	32 feet
Demolition of Three Portable Buildings	Existing	2,880 SF total (~960 SF each)	--	--
Phase 2				
Sports Fields	New Construction	U8	U	
Parking	New Construction	48 spaces	67 spaces (if surface lot) or 165 spaces (if sub-grade lot)	
Demolition of Four Portable Buildings	Existing	3,840 SF 960 SF each)	--	--

TABLE 3-1, CONTINUED

Campus Area	Status	Existing Features	Final Conditions (Existing to Remain and Proposed Campus Plan)	Maximum Height
Phase 3				
Demolition of One Restroom Building	Demolition	510 SF	--	--
Classrooms (along 9th St)	Demolition of Existing and New Construction	6,162 SF (~890 SF/classroom)	21,800 SF (1,200 SF/classroom)	32 feet
Cafeteria Building	New Construction	4,405 SF	6,000 SF	32 feet
Phase 4				
Demolition of Building B	Existing	3,915 SF	--	--
Demolition of Existing Cafeteria	Existing	4,405 SF	--	--
Demolition of Five Portable Buildings	Existing	4,800 SF 960 SF/each)	--	
Auditorium	New Construction	--	5,500 SF	32 feet
Maker Space & Teaming	New Construction	--	12,400 SF	32 feet
Addition to Building A	New Construction	--	4,800 SF	32 feet
Phase 5				
Demolition of Existing Auditorium	Existing	4,963 SF	--	--
Partial Demolition of Building G	Existing	800 SF	--	--
Entryway Completion	New Construction	--	--	--
Renovation of the South Courtyard	New Construction	--	--	--
Renovation of the Existing Administrative Building	Renovation	4,435 SF		

The following descriptions summarize the Proposed Project's activities by phase.

Phase 1 of the Proposed Project would include constructing a new one-story classroom building for transitional kindergarten (TK) and kindergarten (K) students. The improvements would include construction of a dedicated outdoor place space as well as a separate drop-off/pickup for the TK/K students along 9th Street. The proposed activities include demolishing the existing two classroom buildings containing two classroom spaces (1,365 square feet and 1,060 square feet), three portable buildings, and playground, which would be replaced by the 11,050 square feet building containing seven classrooms at 1,350 square feet each and a teacher workroom and restrooms occupying 1,600 square feet, and outdoor play areas that would comply with the District Educational Specifications.

Phase I also includes the relocation of the library and creation of a main entryway to the school campus along Montana Avenue. The library would be approximately 5,000 square feet and together with the new entryway would be designed to provide visibility of the historic structures and form a meaningful connection with the neighborhood. The main entryway would include gradual steps and a ramp leading to the school entryway, which would include a secure entry into the campus.

Phase 2 involves the demolition of four portables, renovation of the playfield and relocation of the parking lot to efficiently use the northern portion of the campus. The U8 playfield would be reoriented at the northwestern portion of the campus along Lincoln Boulevard near its intersection with Alta Avenue. The renovation activities would include resurfacing the field and asphalt replacement; installation of new handball walls, basketball courts, and play equipment; and removal of the tennis courts. The existing 48-space parking lot would be relocated to the north-northwest portion of the campus and the capacity would be increased by 22 spaces to meet existing needs. The parking lot may potentially be constructed as a below-grade lot under the playfield, which would result in a 120-space increase in campus parking.

Phase 3 focuses on new construction of the classrooms and the cafeteria building along 9th Street. The 21,800 square-foot classroom building would be constructed as a two-story building containing 16 classrooms. The 6,000 square-foot cafeteria would include an upgraded, full-service kitchen to support a culinary education program. Dining would be located adjacent to the new cafeteria in the central courtyard area of the campus. The existing classrooms in Building C and one classroom in Building E along 9th Street totaling 6,162 square feet, along with one 510 square foot restroom building would be demolished at the beginning of this phase to provide room for the new construction.

Phase 4 consists of demolishing: Building B; the existing the five portable structures currently located at the central portion of the campus; and the cafeteria located along Lincoln Boulevard. In the place of the demolished structures, a new two-story, 12,400 square-foot, two-studio makerspace building and outdoor maker yard would be constructed. The makerspace building provides two maker "studios" designed to provide flexible uses for science laboratory, art studio, and other creative and collaborative project work, and would include restrooms and storage. The larger spaces would support team teaching, group projects, and after-school programs that cannot be accommodated in a traditional classroom space, and the second floor of the Makerspace building would include teaming rooms. The new 5,500 square foot Auditorium would be constructed at the location occupied by the existing cafeteria. Phase 4 would also include the addition of 4,800 square feet of teaming rooms onto Building A.

Phase 5 involves demolition of the existing 4,963 square foot Auditorium and partial demolition of Building G. Construction activities include renovation of the existing Administrative Building, renovation of the South courtyard area, and completion of the front community lawn at the intersection of Montana Avenue and Lincoln Boulevard. The front lawn would serve as a pick-up/dropoff area for the children and would enhance the integration of the school with the community.

CONSTRUCTION SCHEDULE AND ACTIVITIES

The estimated construction schedule for each phase is shown in **Table 3-2**. Construction work would intensify during summer and outside of regular school hours when class is not in session. However, construction would occur during the school session and during school days. The City of Santa Monica Noise Code (Chapter 4.12) allows construction activity between the hours of 8:00 a.m. and 6:00 p.m., Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturday. No construction work is allowed on Sunday or on holidays. To expedite the construction phases, the District is seeking a noise permit from the City to authorize construction activity to begin at 7:00 a.m. on weekdays. This is needed to allow for construction workers to arrive on campus and begin prior to arrival period of students. As a condition of the permit, the District will provide notification to persons occupying property within 500 feet of the proposed construction activity prior to commencing work under the permit.

TABLE 3-2. CONSTRUCTION SCHEDULE

Phase	Construction Start	Completion	Duration
Phase 1	June 2025	August 2026	15 months
Phase 2 – Surface	June 2026	August 2026	3 months
Phase 2 – Sub Park	June 2026	August 2027	15 months
Phase 3	June 2029	November 2031	18 months
Phase 4	June 2032	November 2034	18 months
Phase 5	June 2034	August 2034	3 months

3.3 REQUIRED PERMITS AND APPROVALS

3.3.1 LEAD AGENCY APPROVAL

The SMMUSD is the lead agency for the Proposed Project, as it is solely empowered to exercise discretionary authority over the proposed design, financing, and implementation. In order to approve the Proposed Project, the SMMUSD Board of Education (Board) must first certify the EIR.

3.3.2 STATE OF CALIFORNIA

- California Department of General Services, Division of the State Architect (construction plan review and approval)
- State Water Board's General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2010-014-DWQ)

3.3.3 CITY OF SANTA MONICA

- Public Works/Engineering (for grading permit and construction noise permit)
- Storm Water MS4 Permit

*Note that the "quad" areas are referred to as "courtyards" in the Initial Study discussions.

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File: 195838Figures.indd

Not to Scale

Source: Moore Ruble Yudell and dsk architects, April 21, 2023

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Masterplan Site Layout

Figure 3-1

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4.0 Environmental Checklist

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4.0 ENVIRONMENTAL CHECKLIST

1. Project title:	Roosevelt Elementary School Campus Plan Project
2. Lead agency name and address:	Santa Monica-Malibu Unified School District 1717 Fourth Street Santa Monica, California 90401
3. Contact person and phone number:	Carey Upton Chief Operations Officer Phone: 310-450-8338 x79383
4. Project location:	801 Montana Avenue (between 9th Street and Lincoln Boulevard) Santa Monica, California 90403 Latitude 34º01'45.30"N, Longitude 118º30'04.91"W Section 31 Township 01 South Range 16 West San Bernardino Meridian Assessor Parcel Number (APN): 4281-025-023
5. Project sponsor's name and address:	Santa Monica-Malibu Unified School District 2828 4th Street Santa Monica, California 90405
6. General Plan designation:	Institutional/Public Lands (main school campus) and Low Density Housing (adjacent satellite facility)
7. Zoning:	Institutional/Public Lands (PL) (main school campus) and Low Density Residential (R2) (adjacent satellite facility)

8. Description of the project:

The Santa Monica-Malibu Unified School District (SMMUSD or District) performed a facilities assessment of Roosevelt Elementary School in order to update the campus to align with its Educational Specifications, which the SMMUSD Board adopted in 2019. The assessment identified priority and future improvements to be performed, which provided the basis for the long-range *SMMUSD Roosevelt Elementary School Campus Assessment, Planning and Design Final Report* (November 20, 2020) (Campus Plan). The proposed Roosevelt Elementary Campus Plan Project's (Proposed Project) physical improvements consist of removing and demolishing six buildings and 12 portables, constructing five new buildings and one building addition, and renovating three buildings and outdoor areas on the existing school campus. The plan also creates new green spaces for outdoor learning and play in areas that are currently paved or part of the footprint of a building. Additionally, a security gate would be installed at each school entry point to control access.

The District intends to move forward with design and engineering of the first phase of funded activities. Later phases of the Proposed Project would occur at the District's discretion as funding is received. Implementation of the Campus Plan would not increase the capacity of Roosevelt Elementary School, nor would the attendance boundaries change. See Section 3.0, Project Description, for more details.

9. Surrounding land uses and setting:

Residential uses surround the campus to the west, north, and east. The uses are predominantly single-unit residential structures, with some multifamily residences located to the northeast and south along Montana Avenue. To the southwest/southeast along Montana Avenue are generally small-scale commercial retail uses, including shops, services, restaurants, and office space. A large retail grocery store is located to the southeast. Similar established commercial retail, combined with single-family and multi-family residential uses, are present to the southwest/southeast beyond Montana Avenue. Other schools that are part of the SMMUSD in the area include Lincoln Middle School, located at 1501 California Avenue, approximately 0.5 miles to the east, and Franklin Elementary School, located at 2400 Montana Avenue, approximately 1.14 miles to the northeast. Goose Egg Park, a public park, lies approximately 0.12 miles to the southwest. The Pacific Ocean is located approximately 0.85 miles to the west/southwest.

10. Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

State of California

- California Department of General Services, Division of the State Architect (construction plan review and approval)
- State Water Board's General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2010-014-DWQ)

City of Santa Monica

- Public Works/Engineering (for grading permit and construction noise permit)
- Storm Water MS4 Permit

11. 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 and Forest Resources	☒ Air Quality
☐ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology and Soils	☒ Greenhouse Gases	☒ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☒ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

12. 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 Proposed 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 W. Upton

Digitally signed by Carey W. Upton
Date: 2023.09.08 14:19:33 -07'00'

Signature

Date

Carey Upton
Printed Name

Santa Monica-Malibu Unified School District
Lead Agency

Chief Operations Officer
Title

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4.1 AESTHETICS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AESTHETICS. Except as provided in Public Resources Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☒	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

4.1.1 OVERVIEW

The Proposed Project's site is located in the City of Santa Monica, which is highly urbanized. The proposed construction activities and site improvements would occur on the existing elementary school campus; no off-site areas would be affected.

As discussed further below, the Open Space Element and Land Use and Circulation Element of the City of Santa Monica General Plan address the City's aesthetic resources that contribute to the visual and architectural quality of the City. Policies intended to guide future development ensure the long-term protection of such resources are identified. As the elementary school campus is a District-owned property (rather than state-owned), construction and operation of the Proposed Project is subject to consideration of the policies outlined in the City's General Plan. Further, the Proposed Project is subject to Article 9, Planning and Zoning, of the Santa Monica Municipal Code (SMMC) which provides regulations to guide site and structural development within the City.

4.1.2 DISCUSSION OF IMPACTS

4.1-a. Have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas may include views of such natural features as topography (e.g., mountain ranges, canyons), water bodies, rock outcrops, natural vegetation, or man-made alterations to the landscape. Public scenic vistas and view corridors provide views of such valued resources.

Within the City of Santa Monica and its vicinity, scenic resources include the Pacific Ocean, Santa Monica State Beach, the bluffs overlooking the beach, Santa Monica Pier, and the Santa Monica Mountains. Additionally, the City's General Plan Land Use and Circulation Element identifies policies aimed at preservation of public view corridors, which include views of the ocean from east-west trending streets; public ocean views and the Santa Monica Pier from Palisades Park; and public views of Santa Monica from the pier. The Open Space Element recognizes the Santa Monica Mountains as an important part of the City's scenic character and identifies policies to strengthen connections to the mountains by protecting and enhancing existing views. However, no such resources are located in the vicinity of the Proposed Project's site, nor is the site located along any identified view corridors. In addition, public views of such resources experienced from the vicinity of the Proposed Project are not officially designated as protected or scenic vistas.

The subject site is located approximately 0.65 miles northeast of Santa Monica State Beach and the Pacific Coast Highway. Views of the site are not afforded from these locations due to distance, as well as intervening development and topography. The Santa Monica Mountains lie approximately 2 or more miles to the northwest. Due to distance, the site is not discernable within the City of Santa Monica when viewed from vantage points along these mountains. Further, due to the location of the campus within the City, the proposed improvements would not obstruct panoramic views of visually prominent or valued resources from any scenic viewpoints in proximity to the site.

Therefore, the Proposed Project would not obstruct an existing valued view or degrade a scenic vista. No impact would occur in this regard. This issue will not be further analyzed in the EIR.

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

No Impact. The only officially state-designated scenic highway in Los Angeles County is State Route 2 (Angeles Crest Highway) as it extends through the Angeles National Forest (Caltrans 2018). The nearest portion of this scenic highway to the Proposed Project's site is located approximately 22 miles to the northeast. State Route 1 (Pacific Coast Highway), which runs along the Pacific Ocean coastline approximately 0.65 miles to the southwest of the Proposed Project's site at its closest point, is eligible for scenic highway status; however, it has not been formally designated as such. Further, due to the distance from these roadways, existing interfering topography, and intervening development, the Proposed Project would not substantially damage scenic resources within a state scenic highway.

It should be noted that, as described in the Historic Resources Inventory (HRI) report prepared by Historic Resources Group (HRG 2022) for Roosevelt Elementary School, certain buildings and features on the school campus have been identified as a historic district that is eligible for listing in the California Register of Historical Resources and for designation by the City of Santa Monica as a historic district. However, none of the buildings/features that contribute to the historic district are visible from a state scenic highway. Refer to Section 4.5, Cultural Resources, for additional discussion relative to historical resources.

The Proposed Project's site is currently developed and supports the existing school facilities. No rock outcroppings are present on-site or nearby. A number of existing, ornamental, non-native trees are present on-site; however, no trees have been identified as having historic significance or scenic value.

For the reasons above, the Proposed Project would not substantially damage any scenic resources within a state scenic highway. No impact would occur. This issue will not be further analyzed in the EIR.

4.1-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 Proposed Project's site is located in the City of Santa Monica, which is highly urbanized. Therefore, evaluation as to whether the Proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings is not required.

The Proposed Project's site supports an existing developed elementary school campus. The Proposed Project components consist of removing and demolishing 6 buildings and 12 portables, constructing 5 new buildings and 1 building addition, and renovating 3 buildings and outdoor areas on the existing school campus. The plan also creates new green spaces for outdoor learning and play in areas that are currently paved or part of the building footprint. Additionally, each school entry point would include a security gate to control access. Although the Proposed Project would respect the historic quality and character of the school, the new buildings could potentially differ in character, mass, density, and/or scale as compared to the existing setting.

SMMUSD goals generally align with the City's intentions for new development (e.g., compatibility with surrounding land uses, context-sensitive design, maintaining visual and architectural quality, building articulation, pedestrian safety). All new construction would be designed and implemented in conformance with the Roosevelt Elementary School Campus Assessment, Planning and Design Final Report; Districtwide Plan for Sustainability; and other design and construction standards required for schools by the California Division of the State Architect (DSA). However, as the Proposed Project would have the potential to conflict with applicable zoning and other regulations governing scenic quality, a potentially significant impact may occur. This issue will be further analyzed in the EIR.

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

Less than Significant Impact. Artificial light during evening and nighttime hours emanates from building interiors and passes through windows, from street lighting for purposes of vehicular circulation and bike and pedestrian safety, and from other exterior sources (e.g., building illumination, security lighting, parking lot lighting, landscape lighting, and signage). The degree of illumination may vary widely depending on the amount of light generated, height of the light source, shielding by barriers or obstructions, type of light source, and weather conditions. Light spillover is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. Artificial light can be a nuisance to adjacent residential areas and diminish the view of the clear night sky. The adjacent residences are considered light sensitive, as occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources.

Glare is caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare is common in urban areas and is typically associated with exterior facades largely or entirely comprising highly reflective glass. Glare can also occur during evening and nighttime hours with the reflection of artificial light sources such as automobile headlights. Glare-sensitive uses include the adjacent residential uses.

Construction

The Proposed Project's construction activities would occur in accordance with the provisions of SMMC Section 4.12.110, which limits the hours of construction to between 8:00 a.m. and 6:00 p.m., Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturday; no construction activities are permitted on Sunday or national holidays. However, pursuant to Section 4.12.110(e) of the City's Municipal Code, it is anticipated that the District would request City approval of a construction permit to authorize construction activity outside of allowable construction hours in order to improve public safety and avoid periods of increased traffic congestion. The construction permit would allow the contractor to begin work at 7:00 a.m., prior to the major drop-off of students during the morning hours.

It is anticipated that all construction would occur during daytime hours. Due to the nature of the improvements proposed and the anticipated construction schedule, it is not anticipated that nighttime construction would be required. Therefore, nighttime lighting sources such as spotlights, floodlights, and/or vehicle headlights would not be generated with construction, thereby avoiding potential adverse effects on adjacent sensitive receptors (e.g., residential uses).

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible areas where the reflection of sunlight could occur. It is also anticipated that the temporary fencing/screening (green mesh screening material incorporated) to be installed along the perimeter of on-site areas where active construction is underway would reduce potential glare effects on off-site receptors. However, any glare would be intermittent given the movement of construction equipment and materials within a given construction area and the temporary nature of construction

activities. In addition, construction would occur during the daytime hours in accordance with the requirements of the SMMC. Accordingly, there would be a negligible potential for daytime glare to occur during construction.

Therefore, based on the analysis above, with adherence to existing SMMC regulations, light and glare associated with the Proposed Project's construction would not adversely impact daytime or nighttime views in the area. A less than significant impact would occur.

Operation

The Proposed Project is a partial redevelopment of the existing school campus. While new exterior night lighting would be included, the amount of lighting would remain essentially the same for the campus. Consistent with SMMUSD practice, new lighting would utilize light emitting diode (LED) bulbs and would be appropriately shielded and aimed downward to reduce potential spill light, glare, and skyglow. New lighting would be limited to that necessary for safety and security, circulation, and facility identification purposes. As such, it is not anticipated that school operations would result in a significant impact with regard to nighttime lighting.

Use of the on-site playfield and recreational amenities would occur during daytime hours, similar to existing conditions, and as such, the playfield and hardscape play areas would remain unlit. Lighting would only be implemented as required by the DSA for means of egress to areas of safe dispersal and accessibility requirements. Additionally, the Proposed Project would not result in a change to operational hours of the school or its associated recreational facilities, and the school would continue to operate during normal daytime hours with exception of periodic evening events, as occurs under current conditions.

Improvements to the existing on-site surface parking lot are proposed; however, it is anticipated that lighting would be similar to that which currently exists. The Proposed Project may potentially include construction of a subterranean parking garage, which is not anticipated to generate a new potential source of nighttime lighting outside of the underground structure itself.

Additionally, the Proposed Project does not include construction or installation of structures using highly reflective materials or surfaces that could create a new source of substantial glare adversely affecting daytime views in the area. The improvements proposed would reflect the architectural style of the existing on-site structures (constructed of stucco, etc.). Any metal surfaces integrated into the proposed building facades would be surfaced with non-reflective paint or otherwise treated (i.e., galvanized) to minimize or reduce the potential for glare to occur. The use of highly reflective building materials or large expanses of glass is not proposed and would therefore not represent a new potential source of substantial glare. A less than significant impact would occur in this regard.

For the reasons above, the Proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts resulting from light and glare would be less than significant. No further analysis is required in the EIR.

4.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES. 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 nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526 and by Government Code Section 51104(f)), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

4.2.1 OVERVIEW

The California Department of Conservation (CDOC) manages the Farmland Mapping and Monitoring Program, which identifies and maps significant farmland. Farmland is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service. The CDOC manages an interactive website, the California Important Farmland Finder. This web-based program identifies the Proposed Project's site as being outside of the farmland survey area. Specifically, the Proposed Project's site is identified as Urban and Built-Up Land, which is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, and is used for residential uses, industrial uses, commercial uses, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and

water control structures (CDOC 2022a). Therefore, the Proposed Project's site is not considered to be agriculturally important land.

4.2.2 DISCUSSION OF IMPACTS

4.2-a Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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 CDOC identifies the area of the Proposed Project as being outside of the farmland mapping boundary (CDOC 2022a). The Proposed Project's site is fully developed with existing educational uses and no farmland exists within the area. Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact would occur, and no further analysis is required in the EIR.

4.2-b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. The Proposed Project would be located on a developed educational campus site. This site is not subject to a Williamson Act contract (CDOC 2017), and the site is zoned Institutional/Public Lands (PL) by the City of Santa Monica. This zoning designation is not intended for agricultural uses. Therefore, implementation of the Proposed Project would have no impact on zoning for agricultural use or a Williamson Act contract. No impact would occur, and no further analysis is required in the EIR.

4.2-c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(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 site contains no forest or timber resources, is not zoned for forestland protection or timber production, and would have no impact on any lands with such zoning. No impact would occur, and no further analysis is required in the EIR.

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

No Impact. The Proposed Project's site contains no forest or timber resources. No impact would occur, and no further analysis is required in the EIR.

4.2-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. No features of the Proposed Project would necessitate or result in the conversion of off-site farmland. The entirety of the Proposed Project would occur on the existing campus of the Roosevelt Elementary School. The Proposed Project's site is not located adjacent to or within the vicinity of any farmland. Thus, no impact would occur, and no further analysis is required in the EIR.

4.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 DISCUSSION OF IMPACTS

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

Potentially Significant Impact. The Proposed Project is located within the South Coast Air Basin, which is governed by the South Coast Air Quality Management District (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), 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. The 2022 AQMP was adopted by the governing board of the South Coast AQMD Governing Board on December 2, 2022.

The Proposed Project would redevelop Roosevelt Elementary School, which would result in an increase in air pollutant emissions during Project-related construction. Because the Proposed Project would not increase the capacity of Roosevelt Elementary School, it is not anticipated to conflict with the AQMP. However, consistency with the AQMP cannot be definitively confirmed until the Proposed Project's emissions are quantified and compared to the AQMD's thresholds and thus, at this time, this impact is considered potentially significant. Therefore, an air quality assessment will be prepared to analyze the Proposed Project's potential air quality impacts and consistency with the AQMP and this topic.

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

Potentially Significant Impact. 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 South Coast Air Basin for ozone and particulate matter (PM_{10} and $PM_{2.5}$). Because the Proposed Project would not 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. An air quality assessment will be prepared to analyze the Proposed Project's potential construction-phase air quality impacts related to criteria pollutants. This impact is considered potentially significant and will be analyzed in the EIR.

4.3-c Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. 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. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The closest sensitive receptors include the on-site student population at Roosevelt Elementary School as well as the adjacent residential uses that surround the campus to the west, north, and east. The Proposed Project's construction activities could potentially expose residents, students, and staff to elevated concentrations of air pollutant emissions from construction equipment exhaust and fugitive dust. An air quality assessment will be prepared to evaluate potential localized impacts from construction of the Proposed Project on sensitive receptors. This impact is considered potentially significant and will be analyzed in the EIR.

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

Less Than Significant Impact. According to the South Coast AQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. As the Proposed Project would modernize and upgrade the existing Roosevelt Elementary School campus, it would not include any uses identified by the South Coast AQMD as being associated with odors.

Construction activities associated with the Proposed Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short term in nature and cease upon the Proposed Project's completion. In addition, the Proposed Project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting equipment off when not in use or by reducing the time of idling to no more than five minutes. This would reduce detectable

odors from heavy-duty equipment exhaust. Any odors generated 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, and this issue will not be addressed in the EIR.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 US Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

4.4.1 DISCUSSION OF IMPACTS

4.4-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 US Fish and Wildlife Service?

Less than Significant Impact. Special-status plant and wildlife species are those that are afforded special recognition by federal, state, or local resource agencies or organizations. Special-status species are of relatively limited distribution and generally require specialized habitat conditions. Special-status species are defined as:

- Listed, proposed, or candidate for listing under the state or federal Endangered Species Acts;
- Protected under other regulations (e.g., local policies, Migratory Bird Treaty Act of 1918 [MBTA]);
- California Department of Fish and Wildlife Species of Special Concern and California Fully Protected Species;
- Listed as species of concern (List 1B, 2, or 3 plants) by the California Native Plant Society; or
- Species that receive special consideration during environmental review under CEQA.

The campus is fully developed with educational facilities and located in a built-out urban setting with surrounding commercial, residential, and mixed-use development. Vegetation at the campus consists of ornamental trees and plants, a playfield, and lawn. Due to the urbanized nature of the Proposed Project's site and surrounding area, there are no natural, vegetated areas that could support candidate, sensitive, or special-status species, or habitat for such species. In addition, the US Fish & Wildlife Service's (USFWS) Information for Planning and Consultation database shows there are no critical habitats at the Proposed Project's site (USFWS 2023a). Therefore, the Proposed Project would not result in direct impacts to special-status species identified as a candidate, sensitive, or special-status species and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

No Impact. The campus is fully developed with the existing elementary school and located in a built-out urban setting. According to the USFWS National Wetlands Inventory, there is no riparian habitat within the Proposed Project's site or its vicinity (USFWS 2023b). Thus, the Proposed Project would not affect any riparian habitats or other sensitive natural communities. There would be no impact, and this issue will not be further analyzed in the EIR.

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

No Impact. The Proposed Project would not impact federally protected wetlands as defined by section 404 of the Clean Water Act (e.g., marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means. The Proposed Project's site is currently developed and located in an urban setting and does not contain any wetlands identified by the National Wetlands Inventory (USFWS 2023b). The nearest wetland habitat to the site is a riverine feature, located approximately 0.6 miles west. Therefore, the Proposed Project would not have a substantial adverse effect on state or federally protected wetlands, and no impact would occur. This issue will not be further analyzed in the EIR.

4.4-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. Implementation of the Proposed Project would not interfere 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. The Proposed Project's site is an existing school, located in an urban environment; it does not contain any watercourse, greenbelt, or open space for wildlife movement, nor does it provide appropriate habitat for plants or wildlife.

However, the existing trees on-site may provide habitat to nesting birds, which are protected pursuant to the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. As a result, the Proposed Project would be conditioned by the District to conform with federal and state requirements as identified in the MBTA and the California Fish and Game Code, aimed at the protection of nesting birds and their eggs/young. The Proposed Project's compliance with the MBTA and California Fish and Game Code would ensure a less than significant impact to migratory wildlife species. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The City of Santa Monica's tree protection ordinance (SMMC Chapter 7.40) requires that any tree, shrub, or plant in any street, park, boulevard, or public place in the City be protected against damage during the repair, alteration, or construction of a building. Existing trees may be removed from the school campus as a result of the proposed improvements. However, the Proposed Project's site is District property, and therefore does not qualify as a any street, park, boulevard, or public place in the City and is not subject to the City's tree protection ordinance. The SMMUSD is committed to taking the necessary measures to protect and preserve the campus urban forests wherever possible. Because the trees that may be potentially removed within the school campus are not protected by a preservation policy or an ordinance, the Proposed Project would not conflict with any local policies or

ordinances protecting biological resources in this regard. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

4.4-f Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The campus is within an urban and developed area. The campus is not within the area of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (CDFW 2023). Therefore, the Proposed Project would not conflict with any of these plans and no impact would occur. This issue will not be further analyzed in the EIR.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
CULTURAL RESOURCES. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

4.5.1 OVERVIEW

The original Roosevelt Elementary School campus (1907) was located at 6th Street and Montana Avenue. However, during the Long Beach earthquake of 1933, the school facilities were severely damaged. Following the earthquake, the campus was demolished and rebuilt at its current location in 1935. The current campus was designed by the master Los Angeles architectural firm Marsh, Smith and Powell. Architectural features on the school's buildings display the smooth surfaces, curved corners, and horizontal banding emblematic of buildings constructed under the support of the WPA and PWA, an architectural style commonly referred to as the PWA Moderne style (HRG 2022).

The design of the campus features the integration of indoor and outdoor spaces, along with concrete patios located adjacent to classroom wings. This new design approach was reflective of the new "Santa Monica Plan" developed by the architects, which was intended to meet the requirements of the new state construction code (which required new seismic building standards) as well as be more modern design. This new approach was formulated between architects and educators from the Santa Monica district and involved buildings that were planned and designed for safety, future expansion, and activity programs in rooms adaptable to such procedures. The Santa Monica Plan was acknowledged as introducing a new trend in educational procedure that provided functional teaching spaces, child-centered buildings, and plentiful outdoor play areas (HRG 2022).

Development on the school campus continued into the 1940s with buildings designed by architect Joe M. Estep with support of the WPA. The earlier phases of construction located the campus in the southcentral region of the subject parcel and resulted in PWA Moderne-style buildings on a finger-plan school plan. During the 1930s and early 1940s, on-site buildings were designed with the new Moderne buildings, with a specific focus on improving the ability of structures to withstand seismic activity (HRG 2022).

Development on-site following World War II was focused on the western portion of the campus. Estep designed several buildings in 1951 that reoriented the primary entrance to the school to Lincoln Boulevard. The original cafeteria was demolished, a new library was built, and a classroom was expanded in 1968. A number of permanent buildings, temporary buildings, and support structures were added in the 1990s in an ad hoc manner to address increased demand for new facilities, accommodate a growing student population, and meet educational needs (HRG 2022).

4.5.2 DISCUSSION OF IMPACTS

4.5-a Cause a substantial adverse change in the significance of a historical resource as defined in section 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 in Section 3, Project Description, based on visual observation of the campus, preliminary research, and evaluation of the eligibility criteria for listing of the existing school facilities at the federal, state, and local levels, the HRI identified a historic district on the school campus that is eligible for listing in the California Register of Historical Resources and for designation by the City of Santa Monica as a historic district (HRG 2022). The historic district is composed of six contributing buildings, five site features, and two additional features, ranging in date from 1935 to 1940. Elements contributing to the historic district are listed in Table 2-5, Features in the Historic District. Figure 2-5, Potential Historic District Map, shows the location of the contributing buildings, site features, and additional features to the historic district, along with the historic district's boundary. All other buildings and features on the school campus were determined to be ineligible for listing at the federal, state, and local levels. Therefore, due to conditions on-site and potential effects of the Proposed Project as a result of physical construction, a historical resources assessment will be prepared, in conformance with the requirements of Board Policy 7113 and Administrative Regulation 7113.

For the reasons stated above, the Proposed Project, as designed, may have the potential to result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5. Impacts are considered to be potentially significant and will be further analyzed in the EIR.

4.5-b Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Potentially Significant Impact. The campus is a developed site, located within an urbanized residential portion of the City of Santa Monica. Construction of each phase of the Proposed Project would generally involve demolition of some existing on-site structures, followed by minor grading and foundation work, building construction and/or renovation, and architectural coating. Unanticipated and accidental archaeological discoveries are possible during the construction period, particularly during grading or

excavation for new building foundations, which could have the potential to impact unknown archaeological resources. While the potential for discovery of unknown archaeological resources is considered low due to the previously developed nature of the site, unanticipated and accidental archaeological discoveries may be potentially significant.

The Proposed Project would therefore have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5. Impacts are considered to be potentially significant and will be further analyzed in the EIR.

4.5-c Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The campus was originally constructed in 1935, with subsequent improvements and additions occurring over the following decades. No known burial sites are located within the subject site and the area has been previously disturbed by development. In the unlikely event that human remains or funerary objects are discovered during the Proposed Project's related ground-disturbing activities, Health and Safety Code section 7050.5 and Public Resources Code section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, Health and Safety Code section 7050.5 requires that if human remains are discovered on a project site, disturbance of the site shall remain halted until the County coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in section 5097.98 of the Public Resources Code. If the County coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Compliance with existing law regarding the discovery of human remains would ensure that the Proposed Project's potential impacts to human remains would be less than significant. This issue will not be further evaluated in the EIR.

4.6 ENERGY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☒	☐	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

4.6.1 DISCUSSION OF IMPACTS

4.6-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. The Proposed Project would consume energy resources during temporary construction activities, which would result in short-term energy use in the form of electricity from construction equipment and petroleum or diesel fuel from construction equipment and on-road truck and other vehicle trips. 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. Operation of the existing school consumes energy through uses such as 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 2022 Building Energy Efficiency Standards. Under the 2022 standards, buildings would be more energy efficient compared to the 2019 standards.

Because the Proposed Project would redevelop portions of the existing school, increased electrical, gas, and transportation energy demands may result from Project implementation. Therefore, impacts related to energy use during operation are considered potentially significant. The potential for the Proposed Project to result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation will be analyzed in the EIR.

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

Potentially Significant Impact. The campus is currently developed with institutional uses. Operation of the existing school consumes energy for uses such as heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; and use of on-site equipment and appliances. As

discussed above, the Proposed Project would replace older buildings with new, more energy-efficient buildings in compliance with the 2022 Building Energy Efficiency Standards.

Because the Proposed Project would redevelop portions of the existing school, increased electrical, gas, and transportation energy demands may result from Project implementation. Therefore, impacts related to energy use during operation would be potentially significant. The potential for the Proposed Project to conflict with or obstruct a state or local plan for renewable energy or energy efficiency will be analyzed in the EIR.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

4.7.1 OVERVIEW

The campus is in the Santa Monica Plain, an uplifted and inclined alluvial surface within the southwestern block of the Los Angeles Basin. The Los Angeles Basin, a structural trough, is a northwest-trending alluviated lowland plain approximately 50 miles long and 20 miles wide. Mountains and hills that generally expose Late Cretaceous to Late Pleistocene-age sedimentary and igneous rocks bound the basin along the north, northeast, east, and southeast. The basin is part of the Peninsular Ranges geomorphic province of California, characterized by subparallel blocks sliced longitudinally by young, steeply dipping northwest-trending fault zones. The basin is located at the northerly terminus of the Peninsular Ranges.

According to the City of Santa Monica mapped data, beneath any artificial fill imported during the campus construction, the Proposed Project's site is underlain by Quaternary old alluvial fan deposits. These alluvial fan deposits generally consist of brown, dark grayish brown, and reddish-brown silty clay and sandy clay locally channelized with sand and slaty gravels. In general, the fine-grained material ranges from very stiff to hard. The channelized coarse-grained soils consist of a series of fining upward sequences and range from medium dense to very dense (City of Santa Monica n.d.-f).

4.7.2 DISCUSSION OF IMPACTS

4.7-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?

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones along active faults in California to regulate development and prohibit construction on or near active fault traces and reduce hazards associated with fault rupture. The campus is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults are known across the campus (CDOC 2022b). The nearest Alquist-Priolo Earthquake Fault Zone is approximately 800 feet to the northeast, is associated with the Santa Monica Fault, and was established by the California Geological Survey Fault Evaluation Report 259 dated June 28, 2017. Other active and potentially active faults mapped within proximity to the Proposed Project's site include the Potrero Canyon Fault within the Santa Monica Fault Zone (approximately 0.5 miles northwest), the Inglewood Fault/Newport-Inglewood-Rose Canyon Fault Zone (approximately 6.4 miles northeast), the Hollywood Fault/Hollywood Fault Zone (approximately 7.2 miles northeast), and the Solstice Fault/Malibu Coast Fault Zone (approximately 14 miles northwest).

Notwithstanding, the Proposed Project would implement recommendations from a geotechnical investigation, which would include criteria for soil excavation depths, satisfactory selection, placement and compaction of fill, reuse of demolished concrete and asphalt, etc., and development would occur in

accordance with 2022 California Building Code (CBC) requirements.[1] The Proposed Project would result in no impact associated with the rupture of a known earthquake fault. This issue will not be analyzed further in the EIR.

ii) Strong seismic ground shaking?

Less than Significant Impact. The campus is situated in a seismically active region. As is the case for most areas of Southern California, ground-shaking resulting from earthquakes associated with nearby and more distant faults may occur at the campus. The closest major active faults are the Santa Monica Fault, Potrero Canyon Fault, Inglewood Fault, Hollywood Fault, and the Solstice Fault, which range between 800 feet to 14 miles away. 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.

As mentioned, all proposed structures would be designed and built in accordance with applicable current building codes and standards. The current building standard adopted by the legislature is the 2022 version of the 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 on-site, and the strength of ground motion with specified probability of occurring at the site. The Proposed Project design also must be approved by the DSA and construction is required to be monitored by a DSA-approved inspector. The Proposed Project would comply with the legal requirements for school construction to reduce impacts associated with strong seismic ground shaking. Impacts associated with strong seismic ground shaking would be less than significant, and this issue will not be further analyzed in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is the loss of soil strength due to a buildup of excess pore water pressure during strong and long-duration ground shaking. Liquefaction is associated primarily with loose (low density), saturated, relatively uniform fine- to medium-grained, clean cohesionless soils. As shaking action of an earthquake progresses, soil granules are rearranged and the soil densifies within a short period, which results in a buildup of pore water pressure. Liquefaction then occurs when soil shear strength reduces abruptly, and the loose sand and silt behaves like a liquid. Overall, for liquefaction to

[1] The 2022 California Building Standards Code (Cal. Code Regs., Title 24) was published July 1, 2022, with an effective date of January 1, 2023.

occur there must be: (1) loose, clean granular soils, (2) shallow groundwater, and (3) strong, long-duration ground shaking.

Based on CDOC and the City of Santa Monica hazard zone mapping (CDOC 2022b; City of Santa Monica n.d.-f), the campus is not located within a liquefaction zone, liquefaction risk area, or a liquefaction landslide overlap zone, and groundwater in the region is interpreted below a depth of 40 to 50 feet. Given these factors, the potential for liquefaction and lateral spreading to affect the campus is considered low. As such, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, such as liquefaction. Therefore, such impacts would be less than significant, and this issue will not be further analyzed in the EIR.

iv) Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Proposed Project's site and surrounding area are fully developed and characterized by relatively flat topography. Based on CDOC and the City of Santa Monica hazard zone mapping (CDOC 2022b; City of Santa Monica n.d.-f), the campus is not located in an area mapped as potentially susceptible to seismically induced landslides. No landslides are mapped or known to exist at the Proposed Project's site or vicinity, and the site is not located adjacent to a significant slope; therefore, the potential for seismically induced landslides to affect the site is considered low. The Proposed Project would conform with standard structural design requirements from the current CBC. As such, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact related to landslides would occur, and this issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The Proposed Project's implementation would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. The potential for soil erosion would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities of each construction phase. Accordingly, the Proposed Project would comply with best management practices (BMPs) as required by the City of Santa Monica and per SMMC Section 7.10.100, including, but not limited to, a construction stormwater pollution prevention plan (SWPPP), erosion and sediment control plan, sediment removal, and plastic coverings for construction soils/materials. Following completion of the Proposed Project, the campus would be improved with structures, hardscape, landscaping, and appropriate drainage infrastructure. Therefore, with site-specific design features and compliance with City requirements, the Proposed Project's impacts related to sedimentation and erosion impacts would be less than significant. This issue will not be further analyzed in the EIR.

4.7-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 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. As mentioned in Response 4.7-a(iii), groundwater is approximately 50 feet below ground surface. Thus, the potential for liquefaction and lateral spreading to affect the campus is considered low. Therefore, this impact would be less than significant and will not be further analyzed in the EIR.

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

4.7-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. Due to the clayey nature of the soils mapped at the campus, the expansion properties of the soil below the proposed new classroom building should be considered as medium (CBC Section 1803A.5.3). Testing of soils prior to construction would be performed, and the Proposed Project would follow design requirements of the CBC, including those related to seismic design parameters, foundation design, grading, and use of non-expansive soils. 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.

4.7-e Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. As the campus is in an urbanized area served by existing wastewater infrastructure, no septic tanks or alternative wastewater disposal systems would be required. As such, the Proposed Project would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur and this issue will not be further analyzed in the EIR.

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

Less than Significant Impact with Mitigation Incorporated. Paleontological resources are defined as fossilized remains of vertebrate and invertebrate organisms, fossil tracks and trackways, and plant fossils. A unique paleontological site would include a known area of fossil-bearing rock strata.

Paleontological resources are classified as nonrenewable scientific resources and are protected by state statute (Public Resources Code section 5097.5, Archaeological, Paleontological, and Historical Sites). No state or local agencies have specific jurisdiction over paleontological resources; however, all must evaluate potential impacts and provide any applicable mitigation measures. No state or local agency requires a paleontological collecting permit to allow for the recovery of fossil remains discovered as a result of construction-related earth moving on state or private land in a project area.

Impacts on paleontological resources occur when excavation activities encounter fossiliferous geological deposits and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formation, and geologic formations with the potential for containing fossil remains are considered paleontological resources or have the potential to be paleontological resources. Fossil remains are considered important if they are (1) well preserved; (2) identifiable; (3) type/topotypic specimens; (4) age diagnostic; (5) useful in environmental reconstruction; and/or (6) represent new, rare, and/or endemic taxa.

The potential for impacts to paleontological resources to occur depends upon the sensitivity of underlying geologic units and is further influenced by the extent and depth of grading and excavation activities. No known paleontological resources exist within the Proposed Project's area. However, the Proposed Project's site is underlain by Quaternary old alluvial fan deposits which are considered to have a high sensitivity for paleontological resources. It is anticipated that maximum excavation to allow for the proposed improvements would extend approximately 6 feet below ground surface. Therefore, the potential exists for unanticipated discovery of paleontological resources during ground-disturbing activities, which may result in damage or destroy paleontological resources that may be present below the ground surface. As impacts may be potentially significant, this issue will be further evaluated in the EIR.

4.8 GREENHOUSE GASES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
GREENHOUSE GASES. Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	☒	☐	☐	☐

4.8.1 DISCUSSION OF IMPACTS

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact.

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 (AB) 32, Senate Bill (SB) 32, and SB 375, which address GHG emissions on a statewide, cumulative basis.

The Proposed Project would generate GHG emissions during temporary construction activities and long-term operations. Construction would result in short-term GHG emissions produced by construction equipment exhaust as well as on-road truck and other vehicle trips. While the Proposed Project would not increase the capacity of Roosevelt Elementary School, operation of the Proposed Project would result in GHG emissions from energy consumption. Therefore, this impact is considered potentially significant and the EIR will evaluate the potential for the Proposed Project to generate a substantial increase in GHG emissions.

4.8-b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

Potentially Significant Impact. The 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 a 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 SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal; SCAG 2020) identifies the per capita GHG reduction goals for the SCAG region. The Proposed Project would emit GHGs during temporary construction activities and long-term operations. Therefore, this impact is considered potentially significant and the potential for the Proposed Project to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions will be analyzed in the EIR.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
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?	☐	☐	☒	☐
e) For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☒	☐
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

4.9.1 OVERVIEW

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined by the Health and Safety Code section 25501 as follows:

A "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

"Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

An extremely hazardous material is defined in Title 22, section 66260.10, of the California Code of Regulations as follows:

A substance or combination of substances which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the substance or combination of substances because of its quantity, concentration or chemical characteristics.

The release of hazardous materials into the environment could potentially contaminate soils, surface water, and groundwater supplies.

Most hazardous materials regulation and enforcement in Santa Monica is managed by the Santa Monica Fire Department, which refers large cases of hazardous materials contamination or violations to the Los Angeles Regional Water Quality Control Board (RWQCB) and the California Department of Toxic Substances Control (DTSC). It is not at all uncommon for other agencies to become involved when issues of hazardous materials arise, such as the South Coast AQMD and both the federal and state Occupational Safety and Health Administrations.

Under Government Code section 65962.5, both the DTSC and the State Water Resources Control Board (SWRCB) are required to maintain lists of sites known to have hazardous substances present in the environment. Both agencies maintain up-to-date lists on their websites.

4.9.2 DISCUSSION OF IMPACTS

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

Less than Significant Impact. Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners, would be routinely used at the Proposed Project's site. However, all potentially hazardous materials used during construction of the Proposed Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Proposed Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including but not limited to the Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts, South Coast AQMD rules, and permits and associated conditions

issued by the Santa Monica Building and Safety Division. These existing regulations address the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no further analysis is required in the EIR.

Schools do not generate significant amounts of hazardous materials, and only a minimal amount of common day-to-day materials is stored on-site, such as those materials used in routine cleaning of buildings or maintenance of landscaping equipment. These materials would be used, stored, and disposed of in accordance with existing regulations and product labeling and would not create a significant hazard to the public or to the environment. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Proposed Project would be less than significant, and no further analysis is required in the EIR.

4.9-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. As discussed in Impact 4.9-a above, the Proposed Project would not result in the routine transport, use, or disposal of any hazardous materials that would create a significant hazard to the public or the environment. A Phase I ESA was prepared by Alta Environmental DBA NV5 to evaluate the Proposed Project's site for potentially harmful hazardous materials (Alta Environmental DBA NV5 2022). A Tier 1 vapor encroachment screen was completed to evaluate the potential for a vapor encroachment condition (VEC), which is the presence or likely presence of chemical of concern vapors in subsurface soils at a project site caused by the release of vapors from contaminated soil or groundwater on or near the site. The results of the screen did not identify evidence of a potential VEC in connection with the site. In addition, the Phase I ESA concluded that there is no evidence of a recognized environmental condition (REC), controlled REC, or historic REC in connection with the Proposed Project's site. However, based on the age of historical and current structures on the site, arsenic, lead-based paint, asbestos, pesticides, and polychlorinated biphenyls (PCBs) in caulking may have been historically used at the site. As a result, there is a potential for these compounds to be present in the shallow soils on-site (Alta Environmental DBA NV5 2022). Therefore, the Proposed Project could create a significant hazard to the public or the environmental through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Thus, impacts are considered potentially significant, and this issue will be further analyzed in the EIR.

4.9-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's site is located on an existing elementary school campus. None of the proposed new uses would emit any hazardous emissions. A small amount of common

household hazardous materials may be stored in a janitorial storeroom, including cleaning solutions, bleach, and automotive lubricants. As detailed in Impact 4.9-d, below, according to the DTSC HAZNET database, the existing school has disposed of the following: 3.2 tons of asbestos containing waste in 1994 and 0.23 tons of asbestos containing waste in 2014. Nonetheless, the RCRA NonGen/NLR database indicates that the existing site is not listed as a handler of nonhazardous or hazardous waste. Operation of the Proposed Project would not result in significant emitted hazardous emissions or handling of hazardous materials, substances, or waste.

As previously discussed, however, based on the age of historical and current structures on the site, arsenic, lead-based paint, asbestos, pesticides, and PCBs in caulking may have historically been used. As a result, there is a potential for these compounds to be present in the shallow soils on-site. Therefore, implementation of the Proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Thus, impacts are considered potentially significant, and this issue will be further analyzed in the EIR.

4.9-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?

Less than Significant Impact. Section 65962.5 of the Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While section 65962.5 refers to the preparation of a "list," many changes have occurred over the years related to web-based information access and information regarding the Cortese List is now compiled on the websites of multiple agencies.

As part of the Phase I ESA, agency database lists were reviewed for known or suspected contaminated sites and for sites that store, generate, or use hazardous materials near the subject property. Based on the database search, the Proposed Project's site was listed on the USEPA Enforcement and Compliance History Online (ECHO) database; however, no violations are reported. According to two listings on the DTSC HAZNET database, the existing school disposed of the following: 3.2 tons of asbestos containing waste in 1994 and 0.23 tons of asbestos containing waste in 2014. The RCRA NonGen/NLR database indicated that the campus is not listed as a handler of nonhazardous or hazardous waste. In addition, no records of the existing site were identified by the RWQCB's Geotracker database, DTSC's EnviroStor, and Santa Monica Fire Department records (Alta Environmental NV5 2022; SWRCB 2023; DTSC 2023).

Several adjoining properties were listed in regulatory databases as searched by Environmental Data Resources. According to the Phase I ESA, the listed properties do not represent a recognized environmental condition with respect to the Proposed Project's site due to information gathered during the site reconnaissance of Roosevelt Elementary School, the lack of evidence of a past release, the cross or downgradient location of the Proposed Project's site with respect to groundwater flow, the closure status of a past release, and/or the distance to the Proposed Project's site.

Based on the above, the Proposed Project would not create a significant hazard to the public or the environment. Therefore, impacts would be less than significant, and no further analysis is required in the EIR.

4.9-e For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a 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 campus is located approximately 2.7 miles northwest of the Santa Monica Municipal Airport, located at 3233 Donald Douglas Loop South. The Santa Monica Municipal Airport is governed by SMMC Chapter 10.04 (Municipal Airport) and the Los Angeles County Airport Land Use Plan, which was developed by the Los Angeles County Department of Regional Planning/Los Angeles County Airport Land Use Commission (ALUC). This latter document is intended to provide for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations, and to protect the municipal environment from the effects of aircraft noise. Potential land use development is to be judged compatible with the airport based on criteria set forth in the ALUC procedural policies contained in the ALUC document.

According to the Los Angeles County Airport Land Use Plan, the campus is not located within the Santa Monica Airport Influence Area (Los Angeles County ALUC 2004). Federal Aviation Regulations (FAR) Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Code of Federal Regulations Title 14 Part 77.13 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 approval of their project. The Proposed Project does not include high-rise structures in the proximity of the airport airway that would conflict with FAR Part 77 regulations. As a result, the Project would not result in safety hazards for people residing or working in the area.

Additionally, as the campus is not located within the boundaries of the Airport Influence Area, nor any noise contours for the airport, occupants of the Proposed Project would not be exposed to excessive noise from airport operations. Following implementation of the Proposed Project, the existing campus would continue to operate as a public elementary school; no new land use is proposed, and no increase in occupancy or student enrollment would result. Therefore, the Proposed Project would not result in the exposure of occupants of the site to increased safety hazards or noise relative to airport operations. A less than significant impact would occur, and no further analysis is required in the EIR.

4.9-f Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

No Impact. The Proposed Project would conform to applicable City of Santa Monica Fire Department codes and policies and would comply with California SB 187 requirements for Comprehensive School Safety Plans. All campus plans, which include information regarding the location of all buildings, fences, driveway gates, retaining walls, and other construction affecting fire department access, with unobstructed fire lanes for access indicated, would be subject to approval by the state Fire Marshal. The Proposed Project would not affect the conditions of the nearest disaster routes, which include San Vicente

Boulevard (0.4 miles to the northwest), Ocean Avenue (0.5 miles to the southwest), a portion of Wilshire Boulevard (0.5 miles to the southeast/south), and Santa Monica Boulevard (0.8 miles to the southeast) (Los Angeles County Department of Public Works 2004). Therefore, the Proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. No impact would occur, and no further analysis is required in the EIR.

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

No Impact. The campus is in a fully built-out urban environment. The campus is not identified by the California Department of Forestry and Fire Protection (CAL FIRE) as a fire hazard severity zone or in a state responsibility area (refer to Section 4.20, Wildfire, for additional discussion). Therefore, there would be no impact regarding exposure of people to wildland fire hazards as a result of the Proposed Project's implementation. No further analysis is required in the EIR.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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,	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

4.10.1 OVERVIEW

The Proposed Project's school site is located in the Santa Monica Plain, an uplifted and inclined alluvial surface within the southwestern block of the Los Angeles Basin (SMMUSD 2022). The Proposed Project's site is mapped within the United States Geological Survey (USGS) 7.5-Minute Beverly Hills Quadrangle, which shows the Project school campus to be relatively flat with an approximate elevation of 179 feet above mean sea level (amsl) (Alta Environmental DBA NV5 2022). The Federal Emergency Management

Agency (FEMA) has prepared a Flood Insurance Rate Map (FIRM) depicting flood hazard areas in Los Angeles County. According to FEMA, the school campus is located in Zone X, defined as an Area of Minimal Flood Hazard, and no portion of the Proposed Project's site is located within a 100-year floodplain (Flood Map 06037C1590G) (FEMA 2021). The Proposed Project's area is within the jurisdictional boundaries of the Los Angeles RWQCB, one of nine regional boards in the state. The Los Angeles RWQCB protects ground and surface water quality in the Los Angeles region, including the coastal watersheds of Los Angeles and Ventura Counties, along with very small portions of Kern and Santa Barbara Counties. Specifically, the RWQCB identifies potential water quality problems, confirms and characterizes water quality problems through assessments, remedies problems through imposing or enforcing appropriate measures, and monitors problem areas to assess effectiveness of remedial measures. Remedies for problems include prevention and cleanup. Common means of prevention are the issuance of National Pollutant Discharge Elimination System (NPDES) permits, waste discharge requirements, and discharge prohibitions and restrictions. Cleanup is implemented through enforcement measures such as Cease and Desist Orders and Cleanup and Abatement Orders.

The campus is located within the City of Santa Monica's water service area (City of Santa Monica 2021a). The City supplies potable water through a combination of local groundwater from the Santa Monica Groundwater Basin and water purchased from the Metropolitan Water District of Southern California that is imported from the Colorado River or State Water Project. A small amount of non-potable water (less than one percent of the total water supply) is available to the City from the City's Santa Monica Urban Runoff Recycling Facility, which provides non-potable water for uses such as irrigation, toilet flushing, and street sweeping.

The City's local groundwater supply provides on average approximately 60-70 percent of the total water supply (City of Santa Monica 2021a). Groundwater supply has historically been impacted by third-party contamination as well as aging infrastructure in recent years, particularly groundwater production wells operating beyond the typical useful life. The basin encompasses an area of 50.2 square miles in western Los Angeles County and underlies the Cities of Santa Monica, Culver City and Beverly Hills, and portions of western Los Angeles. The Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin (City of Santa Monica 2022a) adopts the historical range of estimates for the sustainable yield for the subbasin of 10,800 to 19,700 acre-feet per year.

4.10.2 DISCUSSION OF IMPACTS

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

Less than Significant Impact. The Proposed Project entails the demolition and construction of structures and outdoor spaces in substantial portions of the school campus across five phases. During construction, there is potential for the Proposed Project to result in degradation of water quality due to use of routine hazardous materials such as vehicle and equipment fuels, lubricants, greases, and oils; erosion and sedimentation, and release of debris during earth disturbance and demolition activities; and paints and coatings in building. As discussed in Section 4.9, Hazards and Hazardous Materials, construction of the

Proposed Project would not create a significant hazard through the transport, use, or disposal of hazardous materials. The Proposed Project is subject to compliance with SMMC Chapter 7.10, Runoff Conservation And Sustainable Management, which the Los Angeles RWQCB has deemed to provide equivalent if not greater water quality benefits than those derived from implementation of the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit (Order No. R4-2012-0175), for which the City is also a co-permittee. As such, construction-related activities would be subject to mandates of the Los Angeles RWQCB that would prevent water quality standards and waste discharge requirements violations and thus prevent water quality degradation.

Prior to construction of each phase of the Proposed Project, the District would be required to prepare and implement site-specific BMPs consistent with its Construction SWPPP. Specifically, BMPs required through the Proposed Project's SWPPP and compliance with SMMC Chapter 7.10 include use of wattles, covering of stockpiles, silt fences, and other physical means of stabilizing disturbed materials and slowing stormwater flow from the graded areas to allow sediment to settle before entering stormwater channels; and scheduling intensive work activities, such as demolition and ground disturbance, to occur outside of the rainy season. The method used would be described in the SWPPP and may vary depending on the circumstances of construction. While not anticipated, if dewatering during construction is needed, the Proposed Project would also be required to obtain a general permit for construction dewatering issued by the RWQCB. Construction of the Proposed Project would therefore not violate water quality standards or waste discharge requirements and would not otherwise substantially degrade water quality. In summary, construction of the Proposed Project, including the planned phased development, would result in a less than significant impact.

During operations, the Proposed Project may contribute to potential stormwater pollution with use of maintenance supplies such as household cleaners, oil and grease, and paints, and pesticides and fertilizers from landscaped areas. However, the District would be required to comply with SMMC Chapter 7.10, which prescribes good housekeeping requirements pertaining to irrigation water, storage of hazardous substances, prohibitions on pesticides, herbicides, fungicides, and other substances, and urban runoff reduction requirements, including implementing a runoff mitigation plan and low-impact development (LID) design, which would reduce site runoff, erosion, and sedimentation.

The Proposed Project has been designed such that stormwater flows generated would be managed on-site to ensure that an increase in volumes or rates above existing conditions do not result with the Proposed Project's implementation. Such design methods would reduce the potential for the Proposed Project to contribute to the degradation of downstream waters over the life of the proposed campus improvements.

As a result, construction and/or operation of the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The City of Santa Monica, and the school campus, lie within the Santa Monica Groundwater Basin, which is a subbasin of the Los Angeles Plain Groundwater Basin (DWR Basin 4-011.01). The City currently relies on groundwater to supplement its water supply. From 2016 to 2020, approximately 65 percent of the water supply was from local water resources and 35 percent was imported. An estimated 64 percent of the City's water supply during this time period was from groundwater; 35 percent was provided by Metropolitan Water District; and 1 percent was from recycled water sources (City of Santa Monica 2021a).

The Proposed Project's site is located within an established educational campus. While there may be new landscaped or turf areas on-site requiring additional watering following the Proposed Project's completion, the District implements a water conservation program that includes upholding an agreement with the City to reduce water consumption by 2 million gallons per year to support the City's 20 percent water reduction goal (SMMUSD 2019). The District currently implements water conservation efforts at Roosevelt Elementary School by conducting water audits and deploying water monitoring software and smart (weather-based) irrigation controllers to track real-time water consumption, performance, and water system operations. With incorporation of the school's active water conservation practices and design, in accordance with the District's agreement with the City, the Proposed Project would not substantially increase groundwater demand or otherwise deplete area groundwater supplies.

As discussed above, the Proposed Project would be subject to conformance with local and state laws pertaining to the regulation of on-site stormwater flows to ensure that the Proposed Project does not result in degradation in the quality of downstream waters or groundwater supplies, or otherwise affect overall groundwater management within the basin.

As stated, the Proposed Project would be subject to requirements of SMMC Chapter 7.10, Runoff Conservation And Sustainable Management, which is aimed at permanently modifying structural causes of urban runoff pollution, including the reduction of both runoff volume and runoff contamination from existing residential and nonresidential properties and from future development. The ordinance aims to ensure that project sites maximize on-site percolation of runoff, and that rainwater is directed or contained so as not to become polluted by passage through contaminating material.

In accordance with Section 7.10.050(b), the City requires that new development prepare a runoff mitigation plan that identifies measures to infiltrate or treat projected runoff by an amount equal to or greater than the volume of runoff produced from a storm event through incorporation of design elements that address established goals so as to achieve the required projected runoff infiltration or treatment. Such design elements may include: 1) maximizing permeable areas to allow more percolation of runoff into the ground through such means as biofilters, green strips, or swales and encouraging the use of permeable materials in lieu of or to replace hardscapes to increase the amount of runoff seepage into the ground; 2) maximizing the amount of runoff directed to permeable areas and/or maximizing stormwater storage for reuse or infiltration by such means as orienting roof runoff towards permeable surfaces,

drywells, French drains, or other structural BMPs so that runoff will penetrate the ground instead of flowing off-site; grading the site to divert flow to permeable areas; using cisterns, retention structures, or green rooftops to store precipitation or runoff for reuse; or, removing or designing curbs or berms so as to avoid isolation of permeable or landscaped areas; or, 3) removing pollutants through installation of treatment control BMPs.

Alternatively, and as appropriate, a waiver from the requirement to provide a design that infiltrates or treats projected runoff for new development by an amount equal to or greater than the volume of runoff produced from a storm event (SMMC Section 7.10.050[b]) may be issued by the City of Santa Monica Director of the Department of Environmental and Public Works Management if it can be demonstrated that implementing such requirements is impractical. Recognized circumstances may include where the following conditions occur: extreme limitations of space for treatment; unfavorable or unstable soil conditions at a site to attempt infiltration; or, risk of groundwater contamination because a known unconfined aquifer lies beneath the land surface or an existing or potential underground source of drinking water is less than ten feet from the soil surface. If a waiver is granted, the applicant is required to transfer the savings in cost, as determined by the Director, to a City stormwater mitigation fund to be used to promote regional or alternative solutions for urban runoff pollution in the storm watershed. The mitigation fund may be operated by a public agency or a nonprofit entity.

Whether through engineering design methods or payment of in-lieu-of fees, the Proposed Project would conform to the City's requirements to ensure that groundwater recharge is not adversely affected over the life of the Proposed Project. With the Proposed Project's conformance to such local regulations, the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the Proposed Project would impede sustainable groundwater management of the basin. Impacts would be reduced to less than significant, and this issue will not be further analyzed in the EIR.

4.10-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 substantial erosion or siltation on- or off-site;

Less than Significant Impact. Refer also to the discussion under Impact 4.10-b, above, regarding the addition of impervious surfaces on-site and controls for stormwater runoff. The campus is fully developed and does not contain any natural surface water features. Implementation of the Proposed Project may alter the existing drainage patterns on the site during construction during earthwork activities, and during operations by adding hardscapes which currently do not exist. However, the District would be required to prepare and implement a SWPPP for construction-related drainage, to comply with the RWQCB's General Construction Stormwater Permit and comply with SMMC Chapter 7.10, Runoff Conservation And Sustainable Management. The SWPPP and SMMC Chapter 7.10 will identify BMPs to be implemented on the Proposed Project's site to minimize soil erosion and protect existing drainage systems.

The Proposed Project has been designed in accordance with the 2022 CBC and 2022 California Green Building Standards Code (CALGreen), and measures identified in SMMC Chapter 7.10, which includes implementation of LID methods and preparation of a runoff mitigation plan. It should be noted that, as the Proposed Project would be phased over a number of years, each phase would be designed in accordance with the current CBC in effect at the time when construction is proposed. The Proposed Project's design, which would incorporate these requirements as well as engineering erosion controls, would be reviewed and approved as part of the Proposed Project's construction and building permits. Compliance with existing state and local regulations developed to minimize erosion and siltation would reduce this impact during construction and operations to a less than significant level. 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 off-site;

Less than Significant Impact. The campus does not contain any surface water features; however, implementation of the Proposed Project would alter existing drainage patterns and increase impervious surfaces. However, as mentioned, the Proposed Project would also be designed in accordance with the applicable CBC and CALGreen, which prohibit an increase or concentration of post-construction runoff; and SMMC Chapter 7.10, which includes implementation of LID design and preparation of a runoff mitigation plan, to demonstrate that the projected runoff from the site is reduced by at least a volume equivalent to the impermeable surfaces times 0.75 inches. The Proposed Project's design would be reviewed and approved as part of the required construction and building permits. Compliance with existing state and local regulations developed to minimize stormwater drainage characteristics and surface runoff would reduce this impact during construction and operations to a less than significant level. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. Under existing conditions, the school campus is developed with hardscape surfaces that influence infiltration and affect stormwater runoff from the site. Stormwater from the site currently is accommodated by connection to the City's public stormwater drainage system. Implementation of the Proposed Project would alter existing drainage patterns on-site and increase impervious surfaces that could have the potential to concentrate and increase runoff and exceed the existing stormwater drainage system capacity.

As discussed above under Impacts 4.10-a and 4.10-c, the Proposed Project would be designed in accordance with the 2022 CBC, 2022 CALGreen, and SMMC Chapter 7.10, and would require LID design measures and preparation of runoff mitigation plan. The Proposed Project would incorporate engineering design methods and BMPs consistent with state and local standards and regulations to ensure that runoff from the campus would not substantially increase in rate or volume, as compared to that which occurs under existing conditions. As such, it is not anticipated that development of the campus as planned would

contribute increased amounts of runoff to the City's existing stormwater drainage system in a manner that would exceed capacity over short- or long-term operations. It is anticipated that the City's existing stormwater system would be adequate to accommodate stormwater runoff from the subject site, and expansion of existing City drainage facilities to serve the Proposed Project is not necessary or proposed.

Redevelopment of the campus could generate polluted runoff that includes sediment from soil disturbances; oil and grease from construction equipment, roadways, and parking lots; pesticides and fertilizers from landscaped areas; metals, paints, and hazardous materials from building demolition; and/or construction debris and trash. As discussed above, potential pollutants and runoff from the Proposed Project's construction and operation activities would be managed with implementation of the Proposed Project's SWPPP, runoff mitigation plan, and required practices identified in SMMC Chapter 7.10. As a result, compliance with existing regulations developed to reduce surface and polluted runoff would reduce this impact during construction and operations to a less than significant level. This issue will not be further analyzed in the EIR.

iv) impede or redirect flood flows?

Less than Significant Impact. As discussed above, the Proposed Project's drainage would be designed in accordance with the 2022 CBC, 2022 CALGreen, and SMMC Chapter 7.10. The Proposed Project would be designed to maintain the existing surface flow characteristics and reduce runoff in accordance with LID design requirements and measures identified in the runoff mitigation plan prepared for the Proposed Project. As a result, compliance with existing state and local regulations would reduce this impact during construction and operations to a less than significant level. This issue will not be further analyzed in the EIR.

4.10-d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

No Impact. As noted in Impact 4.10(c)(iv), above, the campus is not in a flood hazard area. The Proposed Project's site is not located within a tsunami hazard zone or in an area affected by a seiche, according to tsunami inundation maps for the Santa Monica area (City of Santa Monica 2023a). All chemicals and potentially hazardous materials on-site would be stored, used, and transported in compliance with local, state, and federal regulations. Implementation of the Proposed Project would not result in any impacts related to the release of pollutants due to Project inundation from flooding, tsunami, or seiche. This issue will not be further analyzed in the EIR.

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

Less than Significant Impact. As discussed under Impacts 4.10-a and 4.10-b, above, the Proposed Project would be designed to be consistent with the Statewide NPDES General Construction Permit and the Los Angeles County MS4 permit for water quality control, for both construction and site improvements.

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

The campus is located within the Santa Monica Groundwater Basin, which is covered under the 2022 Groundwater Sustainability Plan (GSP) (City of Santa Monica 2022). 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 would 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. This issue will not be further analyzed in the EIR.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.11.1 DISCUSSION OF IMPACTS

4.11-a Physically divide an established community?

No Impact. While there are developed residential uses within the vicinity, the campus is located within an established school campus, the original construction of which dates back to 1935, with improvements and additions occurring over subsequent decades. The Proposed Project's activities would occur entirely within the campus. Therefore, no impacts related to the physical division of an established community would result from the Proposed Project and this issue will not be further analyzed in the EIR.

4.11-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, performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This District is consistent with the Institutional/Public Lands land use designation. The Proposed Project would be developed within the boundaries of the existing Roosevelt Elementary School campus, and implementation of the Proposed Project would not increase the school's capacity, nor would the attendance boundaries change. The Proposed Project's development would not require modification to the site's General Plan land use and zoning designations. Additionally, the Proposed Project would result in a continuation of the existing use of the site (academic uses) and would not conflict with the intended use of the campus or with surrounding land uses. 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.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
MINERAL RESOURCES. Would the Project:				
a) 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.12.1 OVERVIEW

There are no active mines within or near the Proposed Project's site. No known areas with mineral resources on the Proposed Project's site.

4.12.2 DISCUSSION OF IMPACTS

4.12-a 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?

No Impact. The Proposed Project's site is mapped Mineral Resource Zone 3 by the CDOC California Geological Survey, indicating that the site is located in an area known or inferred to contain Portland cement concrete aggregate resource of undetermined mineral resource significance (CDOC 2021). According to the CDOC Division of Mine Reclamation, no mineral resource recovery sites are located on or in the immediate vicinity of the Proposed Project's site (CDOC 2016). Further, according to the CDOC Geologic Energy Management Division, the nearest oil and gas well to the Proposed Project's site is located 0.6 miles to the northwest, with an additional oil and gas well approximately 0.64 miles to the northwest; however, these wells have been categorized as canceled and plugged, respectively (CDOC 2023). No other types of 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. No impact would occur, and no further analysis is required in the EIR.

4.12-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 Impact 4.12-a, above, no mineral resource recovery sites are located on or in the immediate vicinity of the campus. Therefore, the Proposed Project would not 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 would occur, and no further analysis is required in the EIR.

4.13 NOISE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
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?	☐	☐	☐	☒

4.13.1 DISCUSSION OF IMPACTS

4.13-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, such as the residences adjacent to the Proposed Project's site.

SMMC Section 4.12.110(a) limits construction to the hours of 8:00 a.m. to 6:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 pm on Saturday. Construction is not allowed on Sundays or on holidays. However, the District may seek a noise permit from the City to authorize construction activity to begin at 7:00 a.m. on weekdays to expedite the construction phases. The permit would also allow construction workers to arrive on campus and begin prior to the arrival period of students and require notification to persons occupying property within 500 feet of the proposed construction activity prior to commencing work under the permit.

Long-term operation of new development under the Proposed Project could result in long-term noise impacts if Project-related noise sources substantially increase noise levels in the vicinity of the campus at levels that exceed thresholds identified by the SMMC at off-site sensitive receptors. Operational noise

sources would likely include stationary sources such as heating, ventilation, and air conditioning units; activities associated with outdoor activities; and educational and recreational uses. Impacts regarding generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance will be analyzed in the EIR. Impacts are considered potentially significant and will be further examined in the EIR.

4.13-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. The effect on buildings and sensitive receptors in the vicinity of the construction site varies depending 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.

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, the Proposed Project's operations would not create perceptible vibration impacts to the nearest sensitive receptors. A less than significant impact would occur pertaining to vibration impacts from the Proposed Project's operation.

However, with consideration of the school's historic character, structures on-site may be uniquely susceptible to damage from vibration during construction activities. In addition, sensitive receptors near the campus may be affected by any construction-related groundborne vibration generated at the campus. Therefore, impacts regarding excessive groundborne vibration or groundborne noise levels will be analyzed in the EIR. Impacts are considered potentially significant.

4.13-c 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 campus is not located within an airport land use plan and there are no public or private airports or airstrips within 2 miles of the campus. The nearest airport to the Proposed Project's site is the Santa Monica Municipal Airport, located at 3233 Donald Douglas Loop South in the City of Santa Monica, approximately 2.7 miles to the southeast; the campus is not located within the Santa Monica Municipal Airport CNEL contours (City of Santa Monica 2021b). Therefore, the Proposed Project's implementation would not expose people residing or working in the campus area to excessive airport noise levels. No impact would occur.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
POPULATION AND HOUSING. Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.14.1 OVERVIEW

The Proposed Project's site is in the City of Santa Monica on an existing school site. No residences are proposed as part of the Proposed Project that would directly generate new population in the surrounding neighborhoods or within the area served by the District.

4.14.2 DISCUSSION OF IMPACTS

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

No Impact. The Proposed Project is located on an established school campus, and no new roads or extensions of existing roads are proposed or necessary to serve the Proposed Project. The Proposed Project does not include the construction of any new homes or businesses**.** As discussed in Section 3.0, Project Description, of this Initial Study, construction activities of the Proposed Project would demolish and remove six buildings and twelve portables, construct five new buildings and one building addition, and renovate three buildings and outdoor areas on the existing school campus. Implementation of the Proposed Project would not increase the capacity of Roosevelt Elementary School, nor would the attendance boundaries change. 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 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.

4.14-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 on 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 and this issue will not be further analyzed in the EIR.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 following public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☐	☒

4.15.1 DISCUSSION OF IMPACTS

4.15-a Fire protection?

Less than Significant Impact. The City of Santa Monica Fire Department (SMFD) provides fire protection and emergency medical services to the campus. The SMFD operates five fire stations throughout the City that respond to over 16,000 calls for service each year (City of Santa Monica n.d.-a). The SMFD provides full-time fire and paramedic services, fire prevention, urban search and rescue, hazardous material response, and airport firefighting capabilities.

The fire station closest to the Proposed Project's site is Station 1 located at 1337 7th Street, approximately 0.9 miles southeast. Fire Station 1 is the Department's newest fire station and has two firefighter and paramedic-staffed fire engines, and an additional fire truck with a 100-foot ladder. The station's crews respond to all fire and life safety emergencies in their district, including medical emergencies (City of Santa Monica n.d.-b).

The school campus is currently served by the SMFD. The Proposed Project would not result in an increase in student enrollment or faculty at the campus, increase in school capacity, or a change in the existing District service boundaries. Therefore, the Proposed Project would not increase the demand for fire protection services beyond that experienced under existing conditions.

New buildings as well as those proposed for upgrading would be subject to current fire code and SMFD requirements for fire alarm and sprinkler systems, fire flows, and any firefighting equipment, fire hydrants, and emergency access. All improvements would be designed and constructed in conformance with applicable fire code standards at the time of construction and would be subject to plan review to ensure that potential hazards to life or property in the event of a fire are minimized. Further, the Proposed

Project would be designed in accordance with DSA requirements 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). The 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.

During construction, which would span multiple years, notice to and coordination with the SMFD would be ongoing and emergency access to all portions of the subject site would be maintained. Additionally, the Proposed Project would be constructed in accordance with applicable City, county, and state regulations, codes, and policies pertaining to fire hazard reduction and protection.

For the reasons above, 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 are less than significant. This issue will not be further analyzed in the EIR.

4.15-b Police protection?

Less than Significant Impact. The Santa Monica Police Department (SMPD) provides law enforcement services to the subject site. The Police Department is located at 333 Olympic Drive, approximately 1.3 miles southeast of the subject site. The SMPD has 483 staff positions, including 233 sworn police officers and 250 civilian staff members (City of Santa Monica n.d.-c). SMPD personnel are organized into five divisions: Office of the Chief, Special Operations, Criminal Investigations, Patrol Operations, and Professional Services. Additionally, the SMPD has a Neighborhood Resource Office Program, comprising eight officers that are assigned to four geographic areas within the City and work alongside Crime Prevention Coordinators to address issues affecting the neighborhood. The campus is located within Beat 4 for the Neighborhood Resource Office Program (City of Santa Monica n.d.-d).

The Proposed Project is not anticipated to create an additional burden on the Department as implementation would not increase the capacity of the school, nor would the attendance boundaries change. During construction, which would span multiple years, notice to and coordination with the SMPD would be ongoing and emergency access to all portions of the site would be maintained. Additionally, any construction-related traffic would be coordinated with operations of the school, ensuring that trucks are not moving in or out during student drop-off or pickup times. During operation, new school buildings would include the same security features as is currently existing, including an active alarm system and exterior lighting for improved visibility.

As stated, the proposed improvements would not result in an increase in the student population or intensify existing uses on-site. As a result, the Proposed Project would not increase demands on police protection services above that currently experienced, nor generate the need for construction of new or

expanded law enforcement facilities. Therefore, impacts would be less than significant. This issue will not be further analyzed in the EIR.

4.15-c Schools?

Less than Significant Impact. The SMMUSD currently serves 8,700 students in transitional kindergarten through twelfth 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 District is also home to 11 early childhood education centers and an adult school.

The Proposed Project would help meet the goals of the District by updating the campus to offer maker spaces with adaptable and specialty learning space, larger classrooms, larger multipurpose spaces, teaming spaces, and new outdoor learning spaces. The Proposed Project would increase the campus building area to allow for more classrooms and storage and the creation of flexible teaming spaces which can be divided into additional classrooms. Additionally, implementation of the Proposed Project would not increase the capacity of the school, nor would the attendance boundaries change.

Therefore, the Proposed Project would not create a need for new or expanded schools or cause new adverse impacts on existing school services such that environmental impacts would result. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

4.15-d Parks?

Less than Significant Impact. Park, recreation, and open space resources, facilities, and services in the City are managed by the City of Santa Monica Community Services Department. The City maintains 32 parks as well as the Civic Auditorium, four community gardens, Cove Skatepark, Annenberg Beach House, the Swim Center, and the Santa Monica Pier. In addition, the Santa Monica State Beach is approximately 3 miles long, covering 245 acres along Santa Monica Bay (City of Santa Monica n.d.-e).

An increase in population or housing is generally associated with an increase in demand for parks. The Proposed Project would not increase the capacity of the existing school nor result in an increase in housing or population in the City. Therefore, the Proposed Project would not create a need for new or expanded parks or cause substantial adverse physical impacts on existing parks. Impacts in this regard would be less than significant. This issue will not be further analyzed in the EIR.

4.15-e Other public facilities?

No Impact. Other public facilities in the City include public libraries and City administrative facilities. The Santa Monica Public Library has five branch libraries that serve the City (Santa Monica Public Library 2015). The closest branch library to the Proposed Project's site is the Montana Branch Library, located at 1704 Montana Avenue, approximately 0.7 miles to the northeast. Other City facilities include the PAL Youth Center, Camera Obscura Art Lab, Ken Edwards Center, and Miles Playhouse.

An increase in population or housing is generally associated with an increase in demand for public facilities. As the Proposed Project would not increase the capacity of the school nor result in an increase

in housing or population in the City, it is not anticipated that implementation of the Proposed Project would impact other public facilities. No impact would occur. This issue will not be further analyzed in the EIR.

4.16 RECREATION

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

4.16.1 OVERVIEW

The City of Santa Monica Community and Cultural Services Department is responsible for overseeing park planning, programming, and staffing the Recreational and Parks Commission. The Community Services Department's Community Recreation Division develops policy and coordinates all park and beach-based services. Additionally, the City of Santa Monica Public Works Department is responsible for providing park maintenance for the City's parks, open space, medians, City facilities, and the Civic Center complex, as well as parks and recreation facilities, such as ball fields, courts, playgrounds, swimming pools, and gardens.

The City currently maintains 32 public parks located throughout the City (City of Santa Monica 2023b). Recreational resources include facilities, senior centers, parks, open space, beach parks, children's playgrounds, school parks, softball and other sport fields/courts, and community gardens. Access to parks and recreational facilities is further expanded through a joint agreement between the City and the SMMUSD for the use of recreational facilities at public schools within the area.

Parks and recreational facilities maintained by the City within the vicinity of the campus include Goose Egg Park, approximately 0.1 mile to the southwest; Christine Emerson Reed Park, approximately 0.4 miles to the southeast; and Palisades Park, approximately 0.5 miles to the southwest. Will Rogers State Historic Park lies approximately 1.8 miles to the north, with the larger Topanga State Park and the Santa Monica Mountains just beyond to the northwest.

4.16.2 DISCUSSION OF IMPACTS

4.16-a 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?

Less than Significant Impact. The City of Santa Monica and the SMMUSD entered into a Master Facilities Use Agreement in May 2012 that was renewed in 2022. The agreement allows the City and the community to use the District's school facilities, including the Roosevelt Elementary School campus. Under the Master Facilities Use Agreement, the Roosevelt Elementary School playfields, recreational facilities, and buildings are available for non-school programming rentals when school and school programs are not in session. The Master Facilities Use Agreement includes a Playground Partnership Agreement that provides recreation space use at Roosevelt Elementary School.

Under existing conditions, authorized groups may utilize the school facilities at these times: during the school year on weekends (Saturday and Sunday) from 9:00 a.m. to 5:00 p.m. Pacific standard time (PST) and 9:00 a.m. to 6:00 p.m. Pacific daylight time (PDT); weekdays during District holidays, 9:00 a.m. to 5:00 p.m. (with no school programming) and 2:00 p.m. to 5:00 p.m. (during school programming); weekdays during non-summer school breaks, 9:00 a.m. to 5:30 p.m. PST and 9:00 a.m. to 6:30 p.m. PDT; and weekdays during summer break, 9:00 a.m. to 6:30 p.m. (non-summer school) and 2:00 p.m. to 6:30 p.m. (during summer school).

The Proposed Project proposes to replace and/or improve a number of existing recreational facilities on-site. As discussed in Section 3.2 of Section 3.0, Project Description, of this Initial Study, Phase 1 of the Proposed Project would demolish the existing PK/TK/K playground and construct new outdoor play areas. During Phase 2 of the Proposed Project, the U8 playfield would be reoriented at the northwestern portion of campus. Proposed renovations include resurfacing the field, asphalt replacement, and installation of new handball walls, basketball courts, and play equipment.

No increase in student population would occur with the Proposed Project as proposed and, therefore, increased demand on the school's recreational amenities would not occur. The Proposed Project would not involve construction of recreational facilities beyond what is proposed to serve the existing and future students (as well as the public under continued implementation of the Master Facilities Use Agreement). 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 in the City is not anticipated as a result of 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. Impacts would be less than significant, and no further analysis is required in the EIR.

4.16-b Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than Significant. Refer to Impact 4.16-a, above. The campus is currently developed/disturbed with the existing elementary school facilities and associated recreational amenities. The Proposed Project's implementation would result in development of new and/or improved recreational facilities on the school property. However, the environmental effects associated with the construction of such facilities would be temporary in nature. Further, no increase in student population would occur with the Proposed Project, and the Proposed Project does not propose housing that would result in population growth. As such, the Proposed Project does not require the construction or expansion of offsite recreational facilities. Impacts would be less than significant, and no further analysis is required in the EIR.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
TRANSPORTATION. Would the Project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

4.17.1 DISCUSSION OF IMPACTS

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

Potentially Significant Impact. The primary entrance is located along Montana Avenue near the administration offices housed in Building J. However, Buildings D (cafeteria) and H (auditorium), located along Lincoln Boulevard in the southwestern portion of the site, historically created the primary entrance to the school campus, and still allow ingress and egress at the school. On-site parking for the school is provided via a surface lot located in the northeastern portion of the campus, with access from 9th Street. The lot provides 48 parking spaces available for staff and visitors.

Implementation of the Proposed Project would result in the modification of on-site pedestrian and vehicular circulation. The Proposed Project would involve changes such as a separate drop-off/pick-up for the TK/K students along 9th Street, the relocation of the existing parking lot, and the completion of the entryway along Montana Avenue. In addition, construction activities would require vehicles such as haul trucks, equipment delivery trucks, and worker vehicles to travel to and from the Proposed Project's site. 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.

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

Less than Significant Impact. CEQA Guidelines section 15064.3 pertains to the assessment of a project's potential transportation impacts based on the vehicle miles traveled (VMT) generated by a project (i.e.,

"the amount and distance of automobile travel attributable to a project," section 15064.3[a]). The Proposed Project would shift the overall design of the 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. The Proposed Project would not result in more vehicle trips to and from the school during operation of the Proposed Project when compared to existing conditions. In addition, the Proposed Project would not substantially modify primary site access locations and traffic patterns—two factors that could potentially result in an increase in average trip lengths. Because total VMT is a function of the total number of trips multiplied by the average trip lengths, the Proposed Project would not result in a VMT increase. Therefore, impacts would be less than significant.

Although the Proposed Project would generate vehicle trips during construction, CEQA Guidelines section 15064.3 addresses the long-term permanent VMT associated with land use development projects and is not specifically concerned with vehicle trips generated during the construction of a project. Therefore, the Proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 (b). Therefore, this impact is less than significant, and will not be further analyzed in the EIR.

4.17-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. During construction, vehicles associated with construction personnel commute trips would be a compatible use on the local road networks. However, as the Proposed Project's site is located within a residential neighborhood, haul trucks and equipment deliveries to and from the Proposed Project's site throughout the day may increase hazards.

Operation of the Proposed Project is not expected to substantially increase hazards due to a geometric design feature or incompatible uses. Although implementation of the Proposed Project would result in the modification of on-site pedestrian and vehicular circulation, all circulation-related improvements would be constructed in accordance with the City of Santa Monica Development Standards and the Santa Monica Department of Transportation standards. Regardless, as construction vehicle trips may pose hazards, the impact is considered potentially significant and will be further analyzed in the EIR.

4.17-d Result in inadequate emergency access?

Potentially Significant Impact. Construction of the Proposed Project would span multiple years and occur in phases. Any construction-related traffic would be temporary and coordinated with operations of the school, ensuring that trucks are not moving in or out during drop-off or pickup times and emergency access is not impeded. During construction, ingress and egress to the Proposed Project's site would be maintained at all times. Notice to and coordination with emergency service providers, including the SMFD and SMPD, would be ongoing regarding the construction schedule and worksite traffic control plans so as to coordinate emergency response routing and maintain emergency access.

The Project proposes modifications to vehicular access and circulation on the campus. To address fire and emergency access needs, the Proposed Project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized

fire and life safety standards of the City and the SMFD. The Proposed Project would also be subject to review by the DSA, which oversees design and construction for K–12 schools. The 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, as the Proposed Project would be subject to DSA plan review, the proposed design and internal circulation would meet all applicable regulations.

The City and SMFD 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 would be less than significant and will not be further analyzed in the EIR.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. 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:				
a) 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	☒	☐	☐	☐
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

4.18.1 OVERVIEW

Assembly Bill 52

AB 52 requires the lead agency (in this case, SMMUSD) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project prior to the release of a negative declaration, mitigated negative declaration, or EIR if: 1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of development projects proposed within the geographic area that is traditionally and culturally affiliated with the tribe, and 2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code section 21080.3.1[d]).

Pursuant to AB 52, the SMMUSD has compiled a list of California Native American tribes that have requested consultation regarding development projects on lands with which such tribes are culturally and traditionally affiliated. These tribes include the Torres Martinez Desert Cahuilla Indians tribe and the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation). Additional discussion is provided below.

4.18.2 DISCUSSION OF IMPACTS

4.18-a. Cause a substantial adverse change in the significance of a tribal cultural resource 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,

4.18-b Cause a substantial adverse change in the significance of a tribal cultural 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potentially Significant Impact. Pursuant to Public Resources Code section 21080.3.1(d), a lead agency is required to formally notify Native American tribes that have previously requested to be on a lead agency's official notification list for new discretionary development projects. Pursuant to AB 52 requirements, notification letters were prepared by the District and sent to Mr. Michael Mirelez, Cultural Resources Coordinator, of the Torres Martinez Desert Cahuilla Indians and Mr. Andrew Salas, Chairman, of the Gabrieleño Band of Mission Indians - Kizh Nation, via registered mail on August 24, 2023. The letters sent to the tribes by the District included a detailed Proposed Project description, maps of the Proposed Project's site and location, and a request for information regarding the potential for the Proposed Project to impact tribal cultural resources. At the time of preparation of this Initial Study, no response from either of the tribes has been received.

The Proposed Project proposes moving and demolishing six buildings and twelve portables, constructing five new buildings and one building addition, and renovating three buildings and outdoor areas on the existing school campus, as well as creating new green spaces for outdoor learning and play in areas that are currently paved or part of the footprint of a building. As such, the Proposed Project has the potential to result in ground disturbance that may impact unknown tribal cultural resources.

Based on the discussion above, the Proposed Project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource. As such, a potentially significant impact to tribal cultural resources may occur. This issue will be further analyzed in the EIR.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

4.19.1 OVERVIEW

Water Services

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. In FY 2017-2018, Roosevelt Elementary School used approximately 2 million gallons of water (SMMUSD 2019). 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; high-efficiency shower heads, toilets, and urinals; irrigation system repairs and controllers; and water monitoring software. The District is also working with the City of Malibu to install flow restrictors and pre-rinse spray valves for food service facilities.

The City of Santa Monica's 2020 Urban Water Management Plan (UWMP) provides water supply and demand information through 2040. As discussed in the UWMP, the City supplies potable water through a combination of local groundwater from the Santa Monica Groundwater Basin (60-70 percent) and water purchased from the Metropolitan Water District of Southern California (30-40 percent) (City of Santa Monica 2021a). The water supply available to the City is identified in the UWMP and is based on three water supply condition scenarios: average/normal water year, single dry water year, and multiple dry water years. As shown in ***Table 4.19-1***, the City has adequate water supply to meet projected demand through 2040 for all scenarios.

TABLE 4.19-1 CITY OF SANTA MONICA WATER SUPPLY AND DEMAND

	Water Supply and Demand by Year (acre-feet)			
	2025	2030	2035	2040
Normal Year Scenario				
Supply	18,626	18,626	18,626	18,626
Demand	14,291	15,102	15,177	15,262
Supply/Demand Difference	+4,335	+3,524	+3,449	+3,364
Single Dry Year Scenario				
Supply	15,508	15,508	15,508	15,508
Demand	14,291	15,102	15,177	15,262
Supply/Demand Difference	+1,217	+406	+331	+246
Multiple Dry Years Scenario[1]				
Supply	16,766	16,766	16,766	16,766
Demand	14,291	15,102	15,177	15,262
Supply/Demand Difference	+2,475	+1,664	+1,589	+1,504

Source: City of Santa Monica 2021a.

1. *Multiple dry years scenario includes the average supply and demand for the five consecutive dry years from Table 7-5 of the 2020 UWMP.*

Wastewater Collection and Treatment

Wastewater infrastructure in the City, including the Proposed Project's site, is maintained by the Santa Monica Water Resources Division. The City's wastewater system includes approximately 152 miles of pipelines, two flow monitoring and sampling stations, and one 26 million gallon per day (MGD) pumping station. Wastewater generated in the City is currently conveyed to the City of Los Angeles' Hyperion Treatment Plant for treatment. On average, 275 million gallons of wastewater enter 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 (City of Los Angeles 2022).

Storm Drainage

The City's storm drainage system consists of drains, laterals, pumps and catch basins, which are maintained by the Santa Monica Public Works. Storm drains are intended to take rainwater straight to the ocean to avoid area flooding. The Santa Monica Urban Runoff Recycling Facility (SMURRF) treats an average of 500,000 gallons per day (gpd) of dry-weather urban runoff. Treated water from SMURRF is sent through a City-wide non-potable water distribution system that serves parks, medians, Woodlawn Cemetery, and dual-plumbed buildings for toilet flushing. The non-potable water is also used by City operations for street sweeping, sewer jetting, and pressure washing (City of Santa Monica 2022b).

The District has ongoing initiatives for improving stormwater management, including a dedicated Stormwater Compliance Manager on staff, implementing urban runoff capture, and a Water Conservation Education Program. The District is working with the City to implement additional stormwater management measures, such as exploring opportunities at existing facilities to capture and infiltrate rainwater and irrigation/stormwater runoff, such as integrating bioswales into landscaping redesign projects (SMMUSD 2019).

Solid Waste

The District has adopted a solid waste program that 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, banning plastic straws and containers, reusing green waste, and a trash-free lunch program. The District is also committed to managing construction and demolition waste using waste prevention/diversion principles and strives to exceed the CALGreen (California Building Standards Code, Part 11) waste diversion requirements. According to the 2019 *Districtwide Plan for Sustainability*, Roosevelt Elementary School generated 229,416 pounds of waste, consisting of 169,403 pounds of landfill waste, 50,193 pounds of recyclables, and 9,280 pounds of green waste, and had a diversion rate of approximately 26 percent in FY 2017-2018.

The City aims to reach zero waste (95% waste diversion) by 2030 with a daily rate of 1.1 pounds per person per day. The City did not meet the 2020 target of 2.4 pounds of waste landfilled per person per day. While the City's daily rate decreased to 5.4 pounds per person per day this past fiscal year, the City will need to continue its efforts to reach its 2030 target (City of Santa Monica 2023b).

The Santa Monica Resource and Recycling Division provides solid waste and recycling collection in the City. The majority of the City's solid waste is disposed of at the Chiquita Canyon Sanitary Landfill. According to the figures published by the California Department of Resources Recycling and Recovery in 2019, the Chiquita Canyon Sanitary Landfill received approximately 64 percent of the City's waste, or 46,256 tons; Sunshine Canyon City/County Landfill received 24 percent, or 17,452 tons; and other landfills throughout the state received approximately 12 percent, or 8,824 tons (CalRecycle 2019a). The Chiquita Canyon Sanitary Landfill currently has remaining capacity of 60,408,000 million cubic yards with a maximum

permitted throughput of 12,000 cubic yards (CalRecycle 2019b). The Sunshine Canyon City/County Landfill currently has a remaining capacity of 77,900,000 million cubic yards with a maximum permitted throughput of 12,100 cubic yards (CalRecycle 2019c).

Electricity and Natural Gas Facilities

Electricity for the District is supplied by Southern California Edison (SCE), and natural gas is supplied by the Southern California Gas Company (SoCalGas). The District participates in the Continuous Energy Improvement Program (CEI) in partnership with SCE and SoCalGas. CEI is a consultative service aimed at helping commercial customers engage in long-term, strategic energy planning. Through the CEI, the District developed a *Strategic Energy Management Plan* to establish its energy strategy and goals. The District also has ongoing and planned initiatives, including on-site solar, LED lighting retrofits, energy tracking and monitoring, facility condition assessments, and implementation of more solar projects.

Telecommunication Facilities

Various private services, including AT&T and Time Warner Communications, provide telecommunication services to the City, including the Roosevelt Elementary School campus. The Proposed Project would include on-site connections to off-site telecommunication services and facilities in the immediate area of the campus.

4.19.2 DISCUSSION OF IMPACTS

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

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

Water and Wastewater

As the Proposed Project would not increase the capacity of Roosevelt Elementary School or change the attendance boundaries, no additional demand for water from the City's water supply or increase in wastewater flows entering the City's wastewater treatment plant is anticipated. The newly constructed buildings would include water and energy conservation features that would be more efficient than existing systems, including low-flow plumbing that would serve to reduce the amount of wastewater entering the City's system. The Proposed Project would not require the construction of new water or

wastewater facilities that would result in a physical impact to the environment. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

Stormwater

The school is connected to the City of Santa Monica's storm drain system. Implementation of the Proposed Project would not substantially increase impervious surfaces within the campus; refer also to discussion under Section 4.10, Hydrology and Water Quality. The drainage facilities at the Roosevelt Elementary School campus are sufficient to accommodate this change in stormwater runoff, prior to discharge to the City of Santa Monica's storm drain system. The Proposed Project would not require the construction of new stormwater drainage facilities that would result in a physical impact to the environment. Impacts would be less than significant and this issue will not be further analyzed in the EIR.

Electric Power, Natural Gas, and Telecommunications

As the Proposed Project would not increase the capacity of Roosevelt Elementary School or change the attendance boundaries, a substantial increase in demand for electric power, natural gas, and telecommunications is not anticipated. The Proposed Project would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations and CALGreen requirements related to energy and water conservation. Furthermore, the District would continue its existing and implement additional initiatives to improve energy conservation and management. These measures will decrease electricity and gas consumption. Therefore, the Proposed Project would not result in a substantial increase in natural gas and electrical service demands, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

4.19-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. Construction of the Proposed Project would require nominal amounts of water for activities, such as dust suppression and washing equipment. These activities would not result in significant water demand and would cease after construction is complete. During operation, the Proposed Project would not result in substantially more water demand than existing conditions as the Proposed Project would not increase capacity. Additionally, the new school buildings would be designed to meet the California 2022 CBC, which would require installation of water conservation features, such as faucet aerators and high-efficiency toilets/urinals. As shown in Table 4.19-1 above, the City has adequate water supply to meet projected demand through 2040 during normal, dry, and multiple dry years. Therefore, impacts would be less than significant and this issue will not be further analyzed in the EIR.

4.19-c Result in a determination by the wastewater treatment provider that 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. The Proposed Project would continue to be provided sanitary sewer service by the City of Santa Monica through its wastewater collection and treatment system, similar to existing

conditions. As no increase in school capacity is associated with development of the Proposed Project, the Proposed Project would not result in substantially greater wastewater collection and treatment demand than that associated with current operations at the site. Impacts would be less than significant and this issue will not be further analyzed in the EIR.

4.19-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. During construction, the Proposed Project would generate solid waste from demolition of existing buildings and pavement. However, 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. Additionally, the generation of construction and demolition waste would cease once construction is complete.

During operation, as no increase in student population is anticipated with development of the Proposed Project, the Proposed Project would not significantly increase the amount of solid waste already generated by Roosevelt Elementary School. 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, which has projected adequate capacity through 2047, the Sunshine Canyon City/County Landfill, which has projected adequate capacity through 2037, and other landfills throughout the state. 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. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less than Significant Impact. The City of Santa Monica and the District comply with state requirements to reduce the volume of solid waste through recycling and organic waste diversion. The City's 2021 per capita disposal rates of 3.6 pounds per person per day (ppd) per residents and 4.2 ppd per employee are well below the CalRecycle targets of 10.9 ppd per resident and 13.5 ppd per employee (CalRecycle 2019d). Also, the District has implemented a Sustainability Plan that outlines the District's recycling, diversion, and waste generation goals.

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

4.20 WILDFIRE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

4.20.1 OVERVIEW

According to current CAL FIRE maps, the campus is not located in a State Responsibility Area (SRA) or a fire hazard severity zone(CAL FIRE n.d). As such, the Proposed Project would not result in a significant impact relative to wildfire and further analysis will not be required in the EIR, as discussed below.

4.20.2 DISCUSSION OF IMPACTS

4.20-a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As stated above, the campus is not located in or near a SRA or lands classified as very high fire hazard severity zones (VHFHSZ). Therefore, the Proposed Project would not impair an adopted emergency evacuation or response plan within such areas. No impact would occur, and further analysis will not be required in the EIR.

4.20-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 Proposed Project's site is not located in or near an SRA or lands classified as VHFHSZ. Therefore, the Proposed Project, due to slope, prevailing winds, and other factors, 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 areas. No impact would occur, and further analysis will not be required in the EIR.

4.20-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's site is not located in or near an SRA or lands classified as VHFHSZ. The Proposed Project would not 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 within such areas. No impact would occur, and further analysis will not be required in the EIR.

4.20-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?

No Impact. The Proposed Project's site is not located in or near an SRA or lands classified as VHFHSZ. Therefore, the Proposed Project would not 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 within such areas. No impact would occur, and further analysis will not be required in the EIR.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the Project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☒	☐	☐	☐
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?	☒	☐	☐	☐
d) Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

4.21.1 DISCUSSION OF IMPACTS

4.21-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 wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed in Section 4.4, the campus is currently developed and located in an urban residential setting. No riparian habitat or other natural habitat as designated by the CDFW and USFWS are present. The potential for the presence of special-status species to occur at the site is limited as vegetation and animal species supported in the limited ornamental landscaping include those that are commonly found in urban environments. The Proposed Project has the potential to directly or indirectly impact nesting birds if construction activities occur during the nesting season (February 1

through August 31); however, compliance with the requirements of the MBTA would ensure that the Proposed Project activities would not result in potential significant impacts on nesting birds. This issue area will not be further analyzed in the EIR.

As stated in Section 4.5, Cultural Resources, the Proposed Project would require ground-disturbing activities within the 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. This topic will be further analyzed in the EIR to evaluate potential impacts and formulate any appropriate avoidance (or mitigation) measures, if applicable.

As stated in Section 4.7, Geology and Soils, based upon fossils found in similar sediments, the Roosevelt Elementary School campus is potentially sensitive to paleontological resources, and impacts on unique paleontological resources could be potentially significant. However, because the potential for paleontological resources to occur in the Proposed Project's site is well understood due to the developed nature of the Project area, which is underlain with similar sediments as the campus, and because mitigation measure GEO-1 identifies standard measures identified to mitigate impacts to paleontological resources in areas with high sensitivity to less than significant levels, this issue will not be further analyzed in the EIR.

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

Potentially 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 4.1 through 4.20, the Proposed Project could potentially result in significant short-term and long-term impacts to aesthetics, air quality, cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, 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.

4.21-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. A cumulative impact could occur if the Proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Potentially significant impacts are identified in this Initial Study related to aesthetics, air quality, cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, noise, transportation, and tribal cultural resources. 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.

4.21-d Does the Project have environmental effects that 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 air quality, cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, noise, and transportation. The significance of these potential impacts will be analyzed in the EIR, and applicable mitigation measures will be identified.

5.0 References

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