SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

ROOSEVELT ELEMENTARY SCHOOL CAMPUS PLAN PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT

Prepared for:

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT
FACILITY IMPROVEMENT PROJECTS
1717 FOURTH STREET
SANTA MONICA, CA 90401

Prepared by:

Michael Baker INTERNATIONAL

MICHAEL BAKER INTERNATIONAL
3760 KILROY AIRPORT WAY, SUITE 270
LONG BEACH, CA 90806

SEPTEMBER 2024

This page intentionally left blank.

APPENDICES

TABLES

FIGURES

EXECUTIVE SUMMARY

INTRODUCTION

This Environmental Impact Report (EIR) analyzes the environmental effects and identifies mitigation measures for potentially significant environmental impacts associated with implementation of the proposed Roosevelt Elementary School Campus Plan Project (Proposed Project). In accordance with the California Environmental Quality Act (CEQA), local government agencies are required to consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An EIR analyzes potential environmental consequences to inform the public and support informed decisions by local and state governmental agency decision makers. This document focuses on impacts determined to be potentially significant in the Initial Study/Notice of Preparation (IS/NOP) completed for the Proposed Project (see **Appendix A**).

This EIR was prepared pursuant to the requirements of CEQA and the Santa Monica–Malibu Unified School District's (SMMUSD or District) CEQA procedures. The District, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment.

Data for this EIR is derived from on-site field observations; discussions with surrounding residents; tribal notification; and specialized environmental assessments (air quality, cultural and historical resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, and pedestrian safety).

Pursuant to CEQA Guidelines section 15123, this Executive Summary briefly summarizes the Proposed Project, potential impacts, significance findings, and proposed mitigation measures; refer also to **Table ES-1**, **Summary of Impacts and Mitigation Measures**. The remainder of the EIR and the supporting technical appendices evaluate the Proposed Project and support the conclusions summarized herein.

PURPOSE AND SCOPE OF THE EIR

An EIR is a public informational document used in the planning and decision-making process. This project-level EIR will analyze the environmental impacts of the Proposed Project from planning to construction, and ultimately, operation of the Proposed Project. The SMMUSD will consider the information in the EIR, public comments received during the public review period and responses to those comments, proposed findings, and a statement of overriding considerations. As a legislative action, the final decision to approve, conditionally approve, or deny the Proposed Project will be made by the SMMUSD.

The purpose of the EIR is to identify:

- Potential significant impacts of the Proposed Project on the environment and the manner in which those significant impacts can be avoided or mitigated.

- Any unavoidable significant impacts that cannot be mitigated.

- Reasonable and feasible alternatives to the Proposed Project that would avoid any significant environmental impacts or reduce those impacts to a less than significant level.

This EIR also discloses impacts found not to be significant, and significant cumulative impacts of past, present, and reasonably anticipated future projects when considered in combination with the Proposed Project.

CEQA requires that an EIR reflect the independent judgment of a lead agency regarding the impacts, disclose the level of significance of the impacts both without and with mitigation, and discuss the mitigation measures proposed to reduce those impacts. An EIR is circulated to responsible agencies, trustee agencies with resources affected by the project, and interested agencies and individuals. The purpose of public and agency review of an EIR includes sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals. Reviewers of an EIR are requested to focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant impacts of a project might be avoided or mitigated.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that it reflects the independent judgment of the lead agency; adopt findings concerning the project's significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

ENVIRONMENTAL IMPACT REPORT ORGANIZATION

Chapter ES Executive Summary. Summarizes the purpose, scope, and format of the EIR; identifies the location of the Proposed Project site; provides a summary of the Proposed Project and the Proposed Project alternatives (and alternatives considered and rejected), areas of controversy and issues to be resolved; and provides a summary of environmental impacts. A summary of Proposed Project impacts and mitigation measures is also provided in tabular format.

Chapter 1.0 Introduction. Describes the purpose of the EIR; use of incorporation by reference; and the CEQA environmental review process including an overview of the IS/NOP process, public review of the EIR, responses to comments, certification of the Final EIR, and mitigation monitoring. A summary of Proposed Project impacts and significance findings is also provided.

Chapter 2.0. Project Description. Provides a background and overview, statement of Proposed Project objectives, location and environmental setting, description of the Proposed Project, and permits and approvals anticipated to be required.

Chapter 3.0 Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses the thresholds used to determine if a significant impact would occur; the methodology used to identify and evaluate potential impacts of the Proposed Project; the existing environmental setting; the level of impact significance before mitigation; the mitigation measures for the Proposed Project; the level of significance after mitigation is incorporated; and the potential cumulative impacts of the Proposed Project in combination with other existing, approved, and proposed development in the area.

Chapter 4.0. Alternatives to the Proposed Project. Describes the alternatives considered and compares their impacts to the impacts resulting with the Proposed Project. Four alternatives for evaluation are identified and include the No Project/No Build Alternative; Complete Preservation Plus New Development Alternative; Majority Preservation Alternative; and Partial Campus

Rehabilitation Alternative. This chapter also discusses alternatives that were considered and rejected from further evaluation.

Chapter 5.0. Consequences of Project Implementation/Other CEQA Considerations. Describes the significant unavoidable adverse impacts of the Proposed Project and any resulting significant irreversible environmental changes; and, potential impacts of the Proposed Project that were determined not to be significant by the IS/NOP and were therefore not discussed in detail in the EIR. Potential growth-inducing impacts resulting with the Proposed Project are also identified.

Chapter 6.0. List of Preparers. Provides a list of people who prepared the EIR and organizations that were contacted during EIR preparation.

Chapter 7.0 References. Provides a list of sources used in the preparation of the EIR.

Appendices. Appendices for the EIR are compiled and attached as supporting documentation, and comprise of the following

- Appendix A.1 Roosevelt Elementary School Initial Study/Notice of Preparation (IS/NOP)
- Appendix A.2 IS/NOP comments
- Appendix B.1 Historical Resources Inventory Report
- Appendix B.2 Historical Resources Technical Report
- Appendix B.3 SCICC Records Search Results
- Appendix C Air Quality, Energy, and Greenhouse Gases Modeling Results
- Appendix D Geotechnical Investigations
- Appendix E Phase I Environmental Site Assessment
- Appendix F Noise Modeling Results
- Appendix G Pedestrian Safety Analysis

PROJECT LOCATION

The Proposed Project site is located in western Los Angeles County, approximately 0.85 miles northeast of the Pacific Ocean and 14 miles west of downtown Los Angeles. To the north are the communities of Pacific Palisades and Brentwood in the City of Los Angeles and the Santa Monica Mountains; to the east are the community of Brentwood and Cities of Beverly Hills and Culver City; to the south are the communities of Venice in the City of Los Angeles and Marina Del Rey in unincorporated Los Angeles County; and to the west is the Pacific Ocean. **Figure 2-1, Regional Vicinity**, shows the location of the campus in a regional context.

The Proposed Project site is located at 801 Montana Avenue (Assessor's Parcel Number: 4280-022-900), north of the Lincoln Boulevard and Montana Avenue intersection in the City of Santa Monica, California. The school campus is bordered by 9th Street on the east/northeast; Montana Avenue on the south/southeast; Lincoln Boulevard on the west/southwest; and Alta Avenue on the north/northwest. Vehicular access into the site is provided via 9th Street, with student drop-off/pick-up along Montana Avenue (main entryway), Lincoln Boulevard, and 9th Street. The school campus 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 Pacific Coast Highway.

PROJECT SUMMARY

The District is in 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, the SMMUSD Board of Education adopted Districtwide Educational Specifications, which provide guidance on creating future learning environments to support new developments in technology and the expectations of the twenty-first-century workforce (SMMUSD 2019) and were found to be in alignment with the District's Mission Statement of providing "extraordinary achievement for all while simultaneously closing the achievement gap."

In 2021, a historical resources evaluation was conducted for the Roosevelt Elementary School campus to identify potential historical resources on the campus. The buildings and features of the Roosevelt Elementary School campus were considered collectively for their potential eligibility for listing in the National Register, the California Register, and/or listing at the local level as a potential historic district. The findings were recorded in a Historic Resources Inventory Report (refer to Appendix B.1), which identified a historic district consisting of six contributing buildings, five site features, and two additional features eligible for listing in the California Register and for designation as a City of Santa Monica historic district.

Details of the contributing components (six contributing buildings, five site features, and two additional features) of the historic district, which are listed in Table ES-1, with photographs of the features shown in **Figure 2-4, Photographs – Existing School Campus** and their locations are shown in **Figure 2-5, Historic District Map**.

TABLE ES-1: FEATURES INCLUDED 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 Ring	1935	Fair	Contributor
Brick Wall	1935	Fair	Contributor
Additional Features			
"Theodore Roosevelt" Panel	c. 1935	Very Good	Contributor
WPA Bronze Plaque	1940	Very Good	Contributor

The Proposed Project would consist of removal and demolition of six buildings and 12 portables, construction of five new buildings and one building addition, and renovation of four buildings and outdoor areas on the existing school campus. Buildout of the Proposed Project would result in construction of approximately 76,146 square feet (existing to remain plus proposed Campus Plan) of new classrooms, administrative and teacher collaboration space, and other support facilities (library, auditorium, kitchen/cafeteria, and Maker Space) on the school campus. The plan would also create a new athletic field (U8 soccer green and track), green spaces for outdoor learning, and play areas. Additionally, each school entry point would include a security gate to better control access and enhance security. The proposed changes in the campus building area are summarized in **Table ES-2, Summary of Proposed Project's Total** Development and shown on **Figure 2-6, Campus Plan Site Layout**.

TABLE ES-2. SUMMARY OF PROPOSED PROJECT'S TOTAL DEVELOPMENT

Campus Area (Existing Structure or Proposed Campus Plan)	Proposed Campus Plan Activity	Existing Size	Final Conditions (Existing to Remain and Proposed Campus Plan)	Max Height (Existing/New) Under Proposed Campus Plan
Phase 1				
Building K (Transitional-Kindergarten (T-K)/ Kindergarten and Outdoor Play Areas)	Demolition of Existing and New Construction	2,452 SF (two classrooms to be demolished)	11,450 SF (seven classrooms at 1,350 SF/classroom and 1,600 SF teacher collaboration room, 400 SF storage/utility room and restrooms)	32 feet
Three Portable Buildings (north of Building K and southeast of Building J)	Demolition	2,880 SF total (~960 SF each)	--	--
Library	New Construction	2,639 SF	4,900 SF	32 feet
Phase 2				
Sports Fields	Demolition and New Construction	U8	U8	--
Parking	Demolition and New Construction	48 spaces	67 spaces (if surface lot) or 165 spaces (if sub-grade lot)	--
Four Portable Buildings (southwest of basketball/ tennis courts)	Demolition	3,840 SF (~960 SF each)	--	--
Phase 3				
One Restroom Building (along 9th Street)	Demolition	510 SF	--	--
Building C (along 9th Street)	Demolition of Existing and New Construction	5,197 SF (~890 SF/ classroom)	21,800 SF (1,200 SF/16 classrooms)	32 feet
Cafeteria/Kitchen Building (along 9th Street)	New Construction	4,405 SF	6,000 SF	32 feet

TABLE ES-2, CONTINUED

Campus Area (Existing Structure or Proposed Campus Plan)	Proposed Campus Plan Activity	Existing Size	Final Conditions (Existing to Remain and Proposed Campus Plan)	Max Height (Existing/New) Under Proposed Campus Plan
Phase 4				
Building B (central campus area, north of the North Courtyard)	Demolition	3,915 SF	--	--
Building D (Cafeteria)	Demolition	4,405 SF	--	--
Five Portable Buildings (north of Building B)	Demolition	4,800 SF (~960 SF/each)	--	--
Auditorium (along Lincoln Boulevard)	New Construction	(Existing 4,963 SF Auditorium to be demolished during Phase 5)	5,500 SF	32 feet
Maker Space & Teaming Area (central campus area)	New Construction	--	12,400 SF	32 feet
Addition to and Renovations to Building A	New Construction and Renovations	--	4,800 SF	32 feet
Phase 5				
Building H (Auditorium)	Demolition	4,963 SF	--	24 feet
Building G	Partial Demolition	800 SF	--	16.5 feet
Entryway (along Montana Avenue)	New Construction	--	--	--
South Courtyard	Renovation	--	--	--
Building E	Renovation	4,861 SF	4,861 SF	16.5 feet
Building J (Administrative Building)	Renovation	4,435 SF	4,435 SF	16.5 feet

The existing 48-space surface parking lot would be relocated to the northern boundary of the campus along the span of Alta Avenue to more efficiently use the northern portion of the campus and increase parking capacity by 19 spaces (for a total of 67 spaces) to better meet existing demands. Alternatively, the parking lot may be reconstructed as a below-grade lot under the athletic field which would result in a 117-space increase in campus parking (for a total of 165 spaces).

As designed, the Proposed Project would result in preservation of the historic quality and character of the school campus by maintaining the original South Courtyard area in the center of the campus and the core buildings. The same spatial relationships between the structures as currently exists would be retained with the Proposed Project design. Additionally, the Proposed Project would result renovation of the front community lawn at the intersection of Montana Avenue and Lincoln Boulevard; the front lawn would serve as a student pick-up/drop-off area and would enhance integration of the school with the community.

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 student capacity at Roosevelt Elementary School nor would it change the existing attendance boundaries.

SUMMARY OF PROJECT ALTERNATIVES

CEQA Guidelines section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that could feasibly attain the basic objectives of a project and avoid or lessen the environmental effects of a project. Further, CEQA Guidelines section 15126.6(e) requires that a "No Project" Alternative be evaluated. **Chapter 4.0, Alternatives,** of this EIR provides a detailed discussion and a qualitative analysis of the following scenarios considered to be potentially feasible alternatives to the Proposed Project.

Alternative 1: Partial Campus Rehabilitation Alternative

Under this alternative, the improvements would consist of implementing the majority (Phase 1, Phase 2, and portions of Phase 3 and 4) of the Proposed Project, with the chief difference being that instead of demolishing the cafeteria and auditorium structures, this alternative would allow the existing cafeteria and auditorium structures to remain and become renovated. Alternative 1 involves the demolition of the Buildings B, C, and K, comprising the majority of the historic district, similar to the Proposed Project. Refer to Figure 4-1, Alternative 1, Partial Campus Rehabilitation. While not an environmental issue, it is important to note that the renovation process for the cafeteria and auditorium would require structural upgrades to meet the current building code requirements for seismic design and safety, which would result in significantly higher design and construction costs compare with constructing a new building.

Alternative 2: Complete Preservation Plus New Development Alternative

This alternative involves preserving and restoring existing permanent buildings on the campus, removal of the portable buildings, and constructing additional buildings to meet a portion of the District's 2019 Districtwide Educational Specifications. The new buildings include a makerspace and flex building, library, and new TK/K Classroom Building, which would be located along the perimeter of the campus where space is available. Renovations would be performed on Building A, Building H, and Building J/Administration. The configuration of this alternative is shown on Figure 4-2, Complete Preservation Plus New Development.

Alternative 3: Majority Preservation Alternative

Under this alternative, Building C and a portion of Building K (the recent addition constructed in 1951) of the historic district would be removed, while the remaining buildings comprising the historic district (Buildings B, C, E, G, and J) would remain, thereby preserving the majority of the historic district. With these changes to be conducted in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the historic district would retain historic value.

This alternative also includes constructing the two-story classroom building along 9th Street (similar to the Proposed Project) that would meet the Educational Specifications for larger classrooms. Additionally, the portables located along Lincoln Boulevard would be removed and new TK/K classroom buildings and yard would be constructed at the northwest corner of the school campus. Further, the auditorium would be renovated. Due to spatial constraints, this alternative would not include teaming areas or improvements to reconstruct or expanding the existing undersized library and administrative buildings to meet the District's Educational Specifications, and it would not be possible to expand the cafeteria with a cooking kitchen. Furthermore, the spatial constraints would not allow for outdoor classrooms, and the outdoor dining area would remain separated from the indoor dining area. The configuration of this alternative is shown on Figure 4-3, Alternative 3, Majority Preservation.

Alternative 4: No Project/No Build Alternative

Per section 15124.6(e)(1) of the CEQA Guidelines, this alternative assumes that no development would occur on the Proposed Project site in the foreseeable future. The site would remain unchanged and none of the proposed improvements would occur. If the Proposed Project were not approved, the District would continue to use the site as an elementary school campus. The onsite buildings and facilities would continue to be maintained and used in their current condition, without replacement, expansion, or renovations.

Alternatives Considered but Eliminated from Further Consideration in the EIR

During the development process for alternatives, and considering feedback during the scoping process, optional alternatives were explored but ultimately rejected because they were found to be infeasible, would not meet Proposed Project objectives, or would not reduce any of the significant impacts resulting with the Proposed Project. The rejected alternatives are described below.

Demolition of the Entire Existing School Campus and Construction of All New Campus Buildings and Facilities

Under this scenario, the District would demolish the entire existing school campus and construct all new campus buildings and facilities. While construction of an entirely new campus would more easily facilitate meeting the educational specifications and the Proposed Project objectives than would the Proposed Project, demolishing the entire campus, including the eligible historic district, would result in a greater magnitude of impacts than the Proposed Project. For this reason, this alternative was not considered further.

Expansion of the School Campus Boundaries by Acquiring Adjacent Properties and Construction of New Structures

The District considered the possibility to expand the school campus boundaries, which would allow the construction of new facilities in the expanded areas in accordance with the Districtwide Educational Specifications, while preserving the existing eligible historic district onsite. As a result, this scenario would avoid significant impacts to historical resources. However, as shown on **Figure 2-3**, **Existing Campus Facilities**, the school campus is located in an area that is fully built out, which constrains available land. In this way, acquisition of adjacent properties to expand the school campus boundaries would neither be physically nor economically feasible. For these reasons, this alternative was not considered further.

Identify and Build Out Satellite Locations to the Existing Campus

Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126.6[f][2][A]). In this alternative, the District would identify other satellite locations in the vicinity of the existing campus, and the satellite locations would be built to include new school facilities in accordance with the Districtwide Educational Specifications. By expanding the area of the school campus, the eligible historic district would be left to remain. As a result, this scenario would avoid impacts to historical resources. However, as mentioned in the above scenario to expand the school campus, the school campus is located in an area that is fully built out, which constrains available land. In this way, acquisition of nearby properties as satellite locations to Roosevelt Elementary School would neither be physically nor economically feasible. In addition, geographically separating an elementary school presents logistical problems and would reduce the District's ability to meet the educational needs of the school's students. For these reasons, this alternative was not considered further.

AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Per CEQA Guidelines section 15050(c), the SMMUSD will act as the lead agency for the Proposed Project. In accordance with CEQA Guidelines section 15082, the SMMUSD prepared and distributed a Notice of Preparation (NOP) for the Proposed Project that was circulated for public review from September 11, 2023 to October 20, 2023. Concerns raised in response to the NOP were considered during preparation of this EIR. A scoping meeting was held on September 27, 2023 at the Roosevelt Elementary School auditorium on the school campus, where an overview of the Proposed Project, CEQA process, and Initial Study were presented. Comments received during the public review period, as well as a summary of the comments received at the scoping meeting, as provided to the SMMUSD by agencies and members of the public during the NOP review period, are provided in **Appendix A** of this EIR.

SUMMARY OF ENVIRONMENTAL IMPACTS

Table ES-1, **Summary of Impacts and Mitigation Measures**, summarizes environmental impacts resulting with Proposed Project implementation and mitigation measures that reduce such impacts. **Table ES-1** identifies the level of significance for each potential impact prior and subsequent to implementation of the proposed mitigation measures. An in-depth discussion of mitigation measures for each environmental impact addressed in this EIR is included in the corresponding environmental topic section (refer to **Sections 3.1** through **3.10**).

Through analysis provided in this EIR, it was determined that the Proposed Project would result in unavoidable significant impacts (with mitigation) to Cultural Resource/Historical Resources. The Proposed Project also has the potential to generate significant environmental impacts with regard to the Cultural Resources/Archaeological Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, and Transportation environmental issue areas. For these resource areas, mitigation measures are identified as appropriate to reduce impacts to a level of less than significant.

CEQA Guidelines section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. As discussed in **Chapter 3.0**, **Environmental Analysis**, of this EIR, of the potential environmental impacts discussed, no impacts were determined to be significant and unavoidable with exception of impacts to historical resources.

AREAS OF NO IMPACT

CEQA Guidelines section 15126.2(a) states that "an EIR [environmental impact report] shall identify and focus on the significant environmental impacts of the proposed project." Further, section 15143 states, "[T]he EIR shall focus on the significant effects on the environment." State CEQA Guidelines section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

Through preparation of the Environmental Initial Study and this EIR, it was determined that the Proposed Project would result in no impact or a less than significant impact relative to the following environmental issue areas: Agriculture and Forestry Resources, Biological Resources, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table ES-3 summarizes the Proposed Project's environmental impacts and proposed mitigation measures that would avoid or minimize such impacts. In the table, the level of significance for each impact is indicated prior to and subsequent to implementation of the proposed mitigation measures.

TABLE ES-3
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Aesthetics			
AES-1: Have a substantial adverse effect on a scenic vista.	No Impact	None	Less Than Significant
AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No Impact	None	Less Than Significant
AES-3: In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, does the project conflict with applicable zoning and other regulations governing scenic quality.	Less Than Significant	None	Less Than Significant
AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Less Than Significant	None	Less Than Significant
Result in a cumulative impact on aesthetic resources.	Less Than Significant	None	Less than Significant
Air Quality			
AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.	Less Than Significant	None	Less Than Significant

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Less Than Significant	None	Less Than Significant
AQ-3: Expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant	None	Less Than Significant
AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	Less Than Significant	None	Less Than Significant
Result in a cumulative impact on air quality.	Less Than Significant	None	Less Than Significant
Cultural Resources			
CUL-1: Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5.	Potentially Significant	**MM CUL-1** **Documentation**: In order to document the historic district as the first example of the "Santa Monica Plan" and its contribution to 1930s and 1940s school design, prior to the issuance of demolition permits, the onsite historic district shall be documented according to Historic American Building Survey (HABS) Level III standards. The documentation shall provide information to future researchers on the significant first school campus built by Marsh, Smith, & Powell as their "Santa Monica Plan," with an emphasis on seismic stability, natural light and air, access to the outdoors, open-air corridors, and student-oriented learning spaces. The HABS Level III documentation shall be prepared by a historian or architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Standards in the relevant discipline. Digital copies of the documentation shall be offered to the following repositories: the Santa Monica Public Library; Santa Monica-Malibu School District; City of Santa Monica Planning Division; and the Santa Monica Conservancy. **MM CUL-2** **Interpretation:** The Santa Monica-Malibu Unified School District shall develop an interpretive program describing the history of the "Santa Monica Plan" and Roosevelt Elementary School. The interpretive program shall be made accessible to the public and may include historic photographs or other ephemeral materials documenting the history of	Significant and Unavoidable

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure		Resulting Level of Significance
			school design in Santa Monica, the creation of the "Santa Monica Plan" by architects Marsh, Smith & Powell and its significance following the 1933 Long Beach earthquake, the development of Roosevelt Elementary School as an early example of this school design, and other relevant themes as determined.	
		MM CUL-3	**Architectural Historian:** The Santa Monica-Malibu Unified School District shall retain an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Standards in Historic Architecture. The architectural historian shall review the proposed plans for the rehabilitation of Building E, Building J, and the South Courtyard at the Roosevelt Elementary School campus to ensure the appropriate treatment of the significant character-defining features consistent with the Secretary of the Interior's Standards for Rehabilitation; and shall be responsible for overseeing implementation of the identified mitigation measures related to historical resources on behalf of the Santa Monica-Malibu Unified School District.	
CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5.	Potentially Significant	**MM CUL-4**	Prior to issuance of any permits allowing ground-disturbing activities for the Proposed Project (for each individual phase), the Santa Monica-Malibu Unified School District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the Project and will be on-call during all grading and other significant ground-disturbing activities. The qualified archaeologist shall ensure that the following measures are followed for the Proposed Project: • Prior to any ground disturbance, the qualified archaeologist, or their designee, shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural (prehistoric and historic) resources. As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural resources be discovered during construction. • In the event that a prehistoric archaeological site (such as any unusual amounts of stone, bone, or shell) or a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted. The Sana Monica-Malibu Unified School District shall be notified of the potential find	Less Than Significant with Mitigation

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		and a qualified archaeologist shall be retained to investigate its significance. • If significant Native American cultural resources are discovered for which a treatment plan must be prepared the Santa Monica-Malibu Unified School District or the archaeologist on call shall contact the applicable Native American tribal contact(s). If requested by the Native American tribe(s), the project applicant or archaeologist on call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, reburial, return of artifacts to tribe). • Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the California Register of Historic Resources standards of significance, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the Santa Monica-Malibu Unified School District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.	
CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.	Less Than Significant	None	Less Than Significant
Result in a cumulative impact on cultural resources.	Potentially Significant	Implement Mitigation Measures **MM CUL-1** to **MM CUL-4.**	Less Than Significant

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Energy			
ENE-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.	Less Than Significant	None	Less Than Significant
ENE-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less Than Significant	None	Less Than Significant
Result in a cumulative impact on energy resources.	Less Than Significant	None	Less Than Significant
Geology and Soils			
GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving: 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. Strong seismic ground shaking. Seismic-related ground failure, including liquefaction. Landslides.	Less Than Significant	None	Less Than Significant
GEO-2: Result in substantial soil erosion or the loss of topsoil.	Less Than Significant	None	Less Than Significant

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure		Resulting Level of Significance
GEO-3: 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	None		Less Than Significant
GEO-4: 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	None		Less Than Significant
GEO-5: 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.	Less Than Significant	None		Less Than Significant
GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant	**MM GEO-1**	Prior to the commencement of any on-site excavation or grading activities, the District shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP 2010) (Qualified Paleontologist). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall be responsible for ensuring the employee training provisions are implemented during implementation of the Proposed Project, and shall report to the Proposed Project Site in the event potential paleontological resources are encountered. A Paleontological Resources Management Plan (PRMP) shall be prepared by the Qualified Paleontologist that incorporates all available geologic data for the Project in order to determine the necessary level of effort for monitoring based on the planned rate of excavation and grading activities, the materials being excavated, and the depth of excavation. The PRMP establishes the ground rules for the entire paleontological resource mitigation program. The Qualified Paleontologist will implement the PRMP as the project paleontologist, program supervisor, and principal investigator. The PRMP shall incorporate the results of the paleontological resources assessments,	Less Than Significant With Mitigation

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		geotechnical investigation, and the final engineering/grading plans for the project including pertinent geological and paleontological literature, geologic maps, and known fossil locality information. The PRMP shall include processes and procedures for paleontological monitoring, fossil salvaging (if needed), reporting, and curation (if needed). The PRMP shall also require the Qualified Paleontologist to prepare a report of the findings of the monitoring efforts after construction is completed. The PRMP shall also require the Qualified Paleontologist to obtain a curatorial arrangement with a qualified repository (e.g., Los Angeles County Natural History Museum) prior to construction if significant paleontological resources are discovered and require curation. A paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials, shall work under the direction of the Qualified Paleontologist and shall be on-site during excavations into native sediments of older alluvium below a depth of 5 feet and native sediments of young alluvium below a depth of 20 feet. Drilling or pile driving activities, regardless of depth, have a low potential to produce fossils meeting significance criteria because any fossils brought up by the auger during drilling will not have information about formation, depth or context. The only instance in which such fossils will meet significance criteria is if the fossil is a species new to the region. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the Los Angeles County Natural History Museum. A final Paleontological Monitoring and Data Recovery Report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.	

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
Result in a cumulative impact on geology and soils.	Potentially Significant	Implement Mitigation Measure **MM GEO-1.**	Less Than Significant with Mitigation
		Greenhouse Gas Emissions	
GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less Than Significant	None	Less Than Significant
GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less Than Significant	None	Less Than Significant
Result in a cumulative impact on greenhouse gas emissions.	Less Than Significant	None	Less Than Significant
		Hazards and Hazardous Materials	
HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant	None	Less Than Significant
HAZ-2: 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	**MM HAZ-1** Prior to demolition or renovation activities, the existing buildings proposed for demolition or renovation shall be inspected by a qualified environmental specialist for the presence of hazardous building materials, including asbestos containing materials, lead-based paints, and polychlorinated biphenyls. If hazardous building materials are detected, abatement and removal of these materials shall be conducted in accordance with applicable federal, state, and local guidelines as follows: • In the event that asbestos containing material and/or lead-based paints are found on the campus, notice shall be provided to South Coast Air Quality Management District, and any demolition activities likely to disturb asbestos containing material and/or lead-based paints shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work in	Less Than Significant with Mitigation

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		conformance with South Coast Air Quality Management District, California Occupational Safety and Health Act (e.g., Asbestos Consultant and Technician Certification), California Department of Public Health (e.g., Department of Public Health Lead-Related Construction Certification), Department of Toxic Substances Control, and other applicable requirements. If found, asbestos containing material and/or lead-based paint shall be disposed of at an appropriately permitted facility. • If polychlorinated biphenyls are found on the campus, these materials shall be managed in accordance with the Metallic Discards Act of 1991 (PRC, sections 42160-42185) and other state and federal guidelines and regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly section 42175, Materials Requiring Special Handling, for the removal of poly-chlorinated biphenyls. • Once hazardous building materials are removed, a follow-up inspection shall be performed of the existing buildings prior to demolition or renovation to confirm that the hazardous items have been removed to an acceptable level per Department of Toxic Substances Control requirements before commencing with demolition activities. **MM HAZ-2** The District shall retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments to conduct soil sampling. The soil sampling shall be conducted prior to any disturbance of the area(s) suspected of potential contamination to evaluate shallow soil conditions with respect to arsenic, lead-based paint, pesticides, and/or polychlorides residues from on-site structures. If the soil sampling identifies the presence of contaminated soils, the contractor shall develop a plan for removal or encapsulation of the affected soils. A Site Management Plan, Corrective Action Plan, Remedial Action Plan, or other equivalent plan shall be prepared that adheres to the Department of Toxic Substances' requirements, regulations, guidance documents, policies, and procedures. The Plan shall include a Health & Safety Plan (HASP) and shall establish remedial measures and/or soil management practices to ensure construction worker safety and the health of future site occupants and visitors. The Plan shall include a plan for management	

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		of soil during construction, dust control measures, and waste management. After the District confirms that the affected soils have been removed, through the collection of soil samples in the excavation areas, the excavation shall be backfilled and compacted with clean soil, and the contractor shall prepare a Completion Report that documents the removal and presents analytical results for the confirmation samples. **MM HAZ-3** **Hazardous On-site Contamination.** Prior to the issuance of a grading permit, the applicant shall conduct additional characterization of the Proposed Project site to assess whether migration of soil vapor impacted with volatile organic compounds from former historical uses near the Proposed Project site has affected the subject property. Construction of the Proposed Project shall not commence until it has been confirmed that soil vapor has not impacted the site or that such conditions have been remediated/mitigated. If concentrations of VOCs in soil vapor exceeding the applicable regulatory standards (i.e., Department of Toxic Substances Control Human Health Risk Assessment Screening Levels) are identified at the Proposed Project site, a Remedial Action Plan shall be prepared and shall include measures to remove or protect against the contaminated conditions. Such measures may include, but may not be limited to, soil vapor extraction; installation of passive venting and implementation of a membrane with the sub-slab design; installment of other vapor barriers and venting systems; and/or ongoing monitoring of soil vapors if future construction is planned for the identified affected areas.	
HAZ-3: 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	Implement Mitigation Measures **MM HAZ-1** to **MM HAZ-3.**	Less Than Significant with Mitigation
HAZ-4: 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	None	Less Than Significant

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
HAZ-5: 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	None	Less Than Significant
HAZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	No Impact	None	Less Than Significant
HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	No Impact	None	Less Than Significant
Result in a cumulative impact relative to hazards and hazardous materials.	Potentially Significant	Implement Mitigation Measures **MM HAZ-1** to **MM HAZ-3.**	Less Than Significant with Mitigation
Noise			
NOI-1: 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	**MM NOI-1** The Santa Monica-Malibu Unified School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to, the following measures: • The construction contractor shall ensure that power construction equipment (including combustion or electric engines), fixed or mobile, shall be equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of construction of the Proposed Project. The combination of muffling devices and noise shielding shall be capable of reducing noise by at least 5 dBA from non-muffled and shielded noise levels. Prior to initiation of construction, the contractor shall demonstrate to the	Less Than Significant with Mitigation

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		City that equipment is properly muffled, shielded, and maintained. All equipment shall be properly maintained to ensure that no additional noise due to worn or improperly maintained parts would be generated. • The construction noise control plan shall depict the location of construction equipment storage and maintenance areas, and document methods to be employed to minimize noise impacts on adjacent noise-sensitive land uses. • At least 15 days prior to commencement of construction, the District shall send notice regarding the Project construction schedule to property owners and occupants located within 500 feet of the Proposed Project grading limits. A sign, visible to the public, shall also be posted at the construction site. All notices and signs shall be reviewed and approved by the City of Santa Monica Public Works Department prior to mailing or posting and shall indicate the dates and duration of construction activities and provide a contact name and a telephone number where residents can inquire about the construction process and register complaints. • The construction contractor shall provide evidence that a construction staff member is designated as a Noise Disturbance Coordinator who shall be present on-site during construction activities. The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City of Santa Monica Public Works Department. All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator. • The Proposed Project applicant shall demonstrate to the satisfaction of the City of Santa Monica Public Works Department that construction noise reduction methods shall be used, including but not limited to, shutting off idling equipment, maximizing the distance between construction equipment staging areas and	

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		occupied residential areas, and the use of electric air compressors and similar power tools, to the extent feasible. • During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers. • To the extent feasible, haul routes shall be designed such that the routes do not pass sensitive land uses or residential dwellings. • In compliance with Santa Monica Municipal Code Section 4.12.110, construction activities and haul truck deliveries shall only occur between the hours of 8:00 AM to 6:00 PM on Mondays through Fridays and 9:00 AM to 5:00 PM on Saturdays unless otherwise authorized. Construction activities shall be prohibited on Sundays and holidays.	
NOI-2: Generation of excessive groundborne vibration or groundborne noise levels.	Less Than Significant	None	Less Than Significant
NOI-3: 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, exposure of people residing or working in the project area to excessive noise levels.	No Impact	None	No Impact
Result in a cumulative noise impact.	Potentially Significant	Implement Mitigation Measure **MM NOI-1.**	Less than Significant with Mitigation
Transportation			
TR-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less Than Significant	None	Less Than Significant

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure		Resulting Level of Significance
TR-2: Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).	Less Than Significant	None		Less Than Significant
TR-3: 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	**MM TR-1**	Before the start of construction, the Santa Monica-Malibu Unified School District shall work with the City of Santa Monica Public Works Department to develop and implement a Construction Management Plan that is specific to the needs of each phase. The Construction Management Plan shall include a Temporary Traffic Control Plan (TTCP) to address anticipated impacts to or closures of public rights-of-way. The Construction Management Plan (including the TTCP) shall be submitted to the City Public Works Department for approval prior to construction of each phase of the Proposed Project. The TTCP shall demonstrate appropriate traffic handling during construction activities for all work that could impact the traveling public (e.g., the transport of equipment and materials to the campus area). The TTCP shall minimize hazards through industry-accepted traffic control practices. At a minimum, the TTCP shall require the contractor to do the following: • Strictly adhere to the construction noise restrictions per Section 4.12.110 of the Santa Monica Municipal Code. Construction and demolition work times are as follows: Monday through Friday, 8:00 a.m. until 6:00 p.m.; Saturdays, 9:00 a.m. until 5:00 p.m.; and no construction or demolition allowed on Sundays and holidays. • Obtain transportation permits necessary for oversized and overweight load haul routes and follow regulations of the applicable jurisdiction for transportation of oversized and overweight loads; • Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if deliveries could preclude free flow of traffic in both directions or cause a temporary traffic hazard; prohibit deliveries of heavy equipment and construction materials during periods of heavy traffic flow (i.e., 30 minutes before or after school start and end times); • Develop a Traffic Education Program to educate parents, students, and staff on drop-off/pickup procedures specific to each phase of construction, which includes informational materials regarding student drop-off and pickup procedures via regular parent/school communication methods and posted on the school website;	Less Than Significant With Mitigation

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
		• Utilize portable message signs and information signs at construction sites as needed; • Coordinate with the responsible agency departments, including the City of Santa Monica Public Works and Planning Departments, and the City of Santa Monica Fire Department no less than 10 days prior to the start of the work for each phase, including specifying whether any temporary vehicle, pedestrian, or bicycle construction detours are needed, if construction work would encroach into the public right-of-way, or if temporary use of public streets surrounding the campus is needed; and • Review all existing emergency access and evacuation plans and identify procedures for construction area evacuation in the case of an emergency declared by local authorities. • The District shall ensure that the construction contractor follows all applicable requirements and regulations established in the City of Santa Monica Procedures and Requirements for Temporary Traffic Control Plans to ensure the TTCP is prepared to City standards and approved as necessary.	
TR-4 Result in inadequate emergency access.	Less Than Significant	None	Less Than Significant
Result in a cumulative transportation impact.	Potentially Significant	Implement Mitigation Measure **MM TR-1.**	Less Than Significant
Tribal Cultural Resources			
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:			
TCR-1 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,	Less Than Significant	None	Less Than Significant

TABLE ES-3, CONTINUED

Impact	Level of Significance without Mitigation	Mitigation Measure	Resulting Level of Significance
TCR-2: 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.	Less Than Significant	None	Less Than Significant
Result in a cumulative impact on tribal cultural resources.	Less Than Significant	None	Less Than Significant

1.1 PURPOSE OF THE EIR

This Draft Environmental Impact Report (EIR) was prepared for the Roosevelt Elementary School Campus Plan Project (Proposed Project) in accordance with and in fulfillment of the California Environmental Quality Act (CEQA). CEQA requires that state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects.

An EIR is described in CEQA Guidelines section 15121(a) as "an informational document which will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible to minimize the significant effects, and describe reasonable alternatives to the project." The EIR must also disclose potentially significant environmental impacts that cannot be avoided; growth-inducing impacts; effects found not to be significant; and significant cumulative impacts associated with past, present, and reasonably foreseeable future projects.

The intent of this Draft EIR is to provide sufficient information on the potentially significant environmental impacts of the Proposed Project, including identification of mitigation measures and Project alternatives that would substantially lessen or avoid potentially significant environmental impacts caused by the Proposed Project, to allow the Santa Monica-Malibu Unified School District (SMMUSD or District), as the lead agency, to make an informed decision on whether to carry out the Proposed Project. Details of the Proposed Project are provided in **Section 2.0**, **Project Description**. Additionally, this Draft EIR is the primary reference document in the formulation and implementation of a Mitigation Monitoring and Reporting Program for the Proposed Project.

1.2 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this Draft EIR in accordance with CEQA Guidelines section 15150. These documents are made available to the public for review at the SMMUSD's Office and consist of the following:

- Roosevelt Elementary School Master Plan, 2023
- SMMUSD Districtwide Educational Specifications, March 2019

1.3 CEQA ENVIRONMENTAL REVIEW PROCESS

The following describes the steps in the Proposed Project's EIR process.

NOTICE OF PREPARATION/INITIAL STUDY AND SCOPING PERIOD

In accordance with CEQA Guidelines section 15082, the District prepared and circulated a Notice of Preparation (NOP) of an EIR and an Initial Study (IS) for public review on September 11, 2023 (see **Appendix A**). The IS/NOP was distributed to state, regional, and local government agencies, organizations, properties in the near vicinity of the school, and other interested parties to inform the public of the potential environmental issues that the Draft EIR would address and to solicit comments.

The scoping period lasted for 39 days from September 11, 2023, to October 20, 2023. A scoping meeting was held on September 27, 2023, at the Roosevelt Elementary School auditorium on the school campus, where an overview of the Proposed Project, CEQA process, and Initial Study were presented. The comments received during the public review period, as well as a summary of the comments received at the scoping meeting, are provided in **Appendix A** of this Draft EIR.

PUBLIC REVIEW OF THE DRAFT EIR

This Draft EIR is being circulated for a 45-day public review period, from September 16, 2024 to October 31, 2024. Interested agencies, organizations, and members of the public are invited to provide written comments on the Draft EIR. As the lead agency, SMMUSD has filed and distributed the Notice of Completion (NOC) and Notice of Availability (NOA) of the Draft EIR In accordance with CEQA Guidelines sections 15085(a) and 15087(a). The NOC/NOA have been transmitted to the State Clearinghouse and the Los Angeles County Clerk for posting and has been distributed to applicable state and local agencies, property owners within 500 feet of the campus, and individuals and organizations that have previously requested to receive the notices.

The NOC/NOA indicate that the Draft EIR and all associated technical appendices may be viewed at the following locations (during normal business hours):

- Santa Monica-Malibu Unified School District Offices at 1717 Fourth Street, Santa Monica, California 90401

- Roosevelt Elementary School Administrative Offices at 801 Montana Avenue, Santa Monica, California 90403

Additionally, the Draft EIR and all associated technical appendices may be viewed and accessed online at SMMUSD's website: https://www.smmusd.org/Page/5595

Any public agency, organization, or members of the public wishing to comment on the Draft EIR may submit their comments in writing or via email with the subject heading, "Roosevelt Elementary School Campus Plan Project" to the following:

- **Mail:** Carey Upton, Chief Operations Officer
  Santa Monica-Malibu Unified School District
  1717 4th Street
  Santa Monica, California 90401
- **Email:** CUpton@smmusd.org

RESPONSE TO COMMENTS/FINAL EIR

Upon completion of the 45-day review period, SMMUSD will review timely written comments received and prepare written responses for each. The Final EIR will include all comments received during the Draft EIR public review period, the SMMUSD's responses to those comments, and any changes to the Draft EIR that result from comments. The District will neither consider nor respond to late comments received outside of the 45-day public comment period.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The Final EIR will be presented to the SMMUSD's Board of Education for potential certification as the environmental document for the Proposed Project if the document is found to be adequate and complete. All persons who comment on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing.

The rule of adequacy generally holds that the Final EIR can be certified if it shows a good faith effort at full disclosure of environmental information and provides sufficient analysis to allow decisions to be made regarding the Proposed Project in contemplation of its environmental consequences. Note that certification of the EIR does not automatically result in the approval of the Proposed Project.

Upon review and consideration of the Final EIR, the District may take action to approve, revise, or reject the Proposed Project. Any decision to approve the Proposed Project will be accompanied by written findings in accordance with CEQA Guidelines section 15091 and, in the case of this Proposed Project, the District's adoption of a statement of overriding considerations. As outlined in CEQA Guidelines section 15093, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

MITIGATION MONITORING

Public Resources Code section 21081.6(a) requires lead agencies to adopt a Mitigation Monitoring and Reporting Program (MMRP) to describe measures that have been adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The MMRP is intended to ensure the implementation of all mitigation measures adopted through the preparation of the Final EIR.

The specific reporting or monitoring program required by CEQA is not required to be included in the Final EIR; however, it will be presented to the District for adoption. Throughout the Draft EIR, mitigation measures have been clearly identified and presented in language that will facilitate establishment of an MMRP. Mitigation measures adopted by the District as conditions for approval of the Proposed Project will be included in the MMRP to verify compliance.

1.4 SCOPE OF THIS DRAFT EIR

The following describes the scope and contents of this Draft EIR. The NOP/IS and scoping process help determine the scope of the environmental issues to be addressed in the Draft EIR. Based on this process, certain environmental categories were identified as having the potential to result in significant impacts. Environmental issues that were considered to have potentially significant impacts are addressed in this Draft EIR; issues identified to result in a less-than-significant impact or no impact are addressed in the IS/NOP (see **Appendix A**) and summarized in **Chapter 5**, **Other CEQA Considerations**.

IMPACTS CONSIDERED LESS THAN SIGNIFICANT AND NO IMPACTS

During preparation of the IS/NOP, SMMUSD determined that the following environmental impact categories would not be significantly affected by the Proposed Project. These categories are addressed in **Chapter 5**, **Other CEQA Considerations**, and in more detail in **Appendix A** of this Draft EIR.

- Agricultural and Forest Resources
- Biological Resources

- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

POTENTIALLY SIGNIFICANT ADVERSE IMPACTS

Through the IS/NOP process, SMMUSD determined that further analysis was needed for the following environmental categories to determine whether the Proposed Project would result in potentially significant impacts. These topics are evaluated in detail in **Chapter 3**, **Environmental Analysis**, of this Draft EIR.

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Noise
- Transportation
- Tribal Cultural Resources

UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. This Draft EIR identified significant and unavoidable adverse impacts, as defined by CEQA, pertaining to the Proposed Project impacts to Historical Resources. Refer to **Section 3.3** for the environmental analysis.

ALTERNATIVES TO THE PROPOSED PROJECT

CEQA Guidelines section 15126.6 requires that an EIR describe a range of reasonable potentially feasible alternatives that could attain the basic objectives of the project and avoid and/or substantially lessen any of the potential significant effects. This section discusses alternatives to the Proposed Project, including the CEQA-mandated “No Project Alternative,” that are intended to avoid or reduce the Proposed Project’s significant environmental impacts.

CONSEQUENCES OF PROJECT IMPLEMENTATION/OTHER CEQA CONSIDERATIONS

This section contains discussions and analysis of various topical issues mandated by CEQA. These topics include significant environmental effects that cannot be avoided if the Proposed Project is implemented, growth-inducing impacts, and effects not found to be significant.

This page intentionally left blank.

2.1 BACKGROUND AND OVERVIEW

The Santa Monica-Malibu Unified School District (SMMUSD or District) is in the process of updating its school facilities, replacing aging and inadequate buildings, and modernizing educational spaces to support current and future learning. In April 2019, the SMMUSD Board of Education adopted the 2019 Districtwide Educational Specifications (Educational Specifications), which provide guidance on developing future learning environments to support new developments in technology and the expectations of the twenty-first-century workforce (SMMUSD 2019). The Educational Specifications outline the physical requirements needed to support the District's educational program(s) and are based on the curriculum goals and core values of the District.

Preparing students for the twenty-first century workforce 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 would be adapted with enhanced flexibility, mobility, and access to technology and resources in real time, where instructors and students may shift seamlessly between programs and instructional opportunities. The Educational Specifications also call for larger classrooms, more and larger multipurpose rooms, and several new shared spaces that do not currently exist. The redesigned campus would have more square feet of interior space.

Following adoption of the Educational Specifications, the District performed a facility assessment of Roosevelt Elementary School campus to identify priority and future improvements that would update the campus to align with the Educational Specifications. The campus assessment was a result of the collaboration among District administration leadership, Roosevelt Elementary School administration, faculty, staff, and parents, and the campus community at large.

Additionally, in February 2021, the District adopted Board Policy (BP) 7113.1 (amended in September 2024) with the vision that historical resources should be identified in advance of approving campus renovation efforts on properties under SMMUSD's jurisdiction to retain and/or commemorate their historical significance when feasible and consistent with educational priorities. The Board Policy requires completion of an inventory of historical resources on a school campus prior to, or at the onset of, the planning and design process. Pursuant to Board Policy 7113, a Historic Resources Inventory Report (**Appendix B.1**) was completed by Historic Resources Group to evaluate potential historical resources on the school campus. In consideration of this evaluation and following a number of community meetings, the Board of Education defined the scope of the Proposed Project.

2.2 STATEMENT OF OBJECTIVES

CEQA Guidelines section 15124(b) requires a project description to include a statement of the objectives of a project that addresses the underlying purpose. The Educational Specifications were developed through a comprehensive, year-long process that engaged District leadership, educational leadership, teachers, staff, user groups, maintenance and operations, and students to arrive at an informed and well-represented set of requirements for the design of future learning environments at SMMUSD. While it was found that due to spatial constraints it is not possible to implement all of the Educational Specifications without demolishing the entire school campus, the

Educational Specifications outline the facility requirements needed to support the District's educational program and are based on the curriculum goals and core values of the District. Thus, the Proposed Project has one basic overarching objective that must be satisfied for any SMMUSD school facility project:

- Improve the District's educational facilities to achieve as many of the District's 2019 Districtwide Educational Specifications adopted by the District Board as feasible and align with the intent of the Educational Specifications to support 21st-century learning at the Roosevelt ES campus. The Educational Specifications include the following considerations:

- Provide properly sized-classroom and facility building sizes to accommodate students and staff and a variety of 21st century learning activities;

- Improve learning at the school by replacing undersized and inflexible facilities with larger, flexible spaces that accommodate modern, diverse learning styles and allow for variable uses, such as rotational learning in the classroom and project-based learning that allows simultaneous individualized, small group, and large group instruction.

- Provide enhanced, modern, and technology support spaces, such as libraries, cafeteria, labs, maker spaces, and other student services, that promote "whole child" development.

- Provide outdoor instructional areas to provide opportunities for art, creativity, exploration, and physical dexterity.

Other supporting Project objectives for the Proposed Project are the following:

- Preserve the philosophy and key elements of the historic district and the Santa Monica Plan while achieving the educational specifications.

- Organize the campus to provide safe student circulation.

- Improve the safety and security of the school.

- Support the campus's existing student capacity.

- Provide sufficient on-campus parking and efficient student drop-off and pick-up facilities.

2.3 PROJECT LOCATION

The Proposed Project site is located in western Los Angeles County in the city of Santa Monica, approximately 0.85 miles northeast of the Pacific Ocean and 14 miles west of downtown Los Angeles. To the north are the communities of Pacific Palisades and Brentwood in the City of Los Angeles and the Santa Monica Mountains, to the east are the community of Brentwood and Cities of Beverly Hills and Culver City, to the south are the communities of Venice in the City of Los Angeles and Marina Del Rey in unincorporated Los Angeles County, and to the west is the Pacific Ocean. **Figure 2-1**, **Regional Vicinity Map**, shows the location of the campus in a regional context.

The Proposed Project site is located at 801 Montana Avenue (assessor's parcel number: 4280-022-900), north of the Lincoln Boulevard and Montana Avenue intersection, in the City of Santa

Monica, California. The school campus is bordered by 9th Street on the east/northeast, Montana Avenue on the south/southeast, Lincoln Boulevard on the west/southwest, and Alta Avenue on the north/northwest. Vehicular access into the site is provided via 9th Street, with student drop-off/pick-up along Montana Avenue (main entryway), Lincoln Boulevard, and 9th Street. The school campus 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 Pacific Coast Highway.

2.4 ENVIRONMENTAL SETTING

2.4.1 Surrounding Land Uses

The Roosevelt Elementary School campus is generally located in an urbanized residential area in 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.

2.4.2 General Plan and Existing Zoning

The City of Santa Monica General Plan land use and zoning designations for the Roosevelt Elementary School campus are 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, such as 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.

2.4.3 Existing Conditions

The Roosevelt Elementary School campus is approximately 6.5 acres in size with a total existing building area of approximately 57,691 square feet. The campus currently supports approximately 46,171 square feet of permanent building area and 11,520 square feet of portable 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.

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
Restrooms	2000	Toilet Rooms	510	Permanent	14'	1
--	Unknown	Classrooms	11,520 total (12 at ~960 SF each)	Portable	14'	1

Source: HRG 2022; dsk Architects 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
1940	North Courtyard
1935	Lincoln & Montana Lawn

Source: HRG 2022

The primary entrance is accessed through a pedestrian path along Montana Avenue between Buildings J and H. 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 in the eastern corner of the site in Building K, near the corner of 9th Street and Montana Avenue. Portable classrooms are in various locations throughout 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 flanked by Building E on the north and Buildings G and J on the south and has a large swath of grass and several planted areas. The North Courtyard occupies the courtyard formed by Buildings B, C, and E and similarly offers a large swath of grass and planted areas. The Lincoln and Montana Quad also provides common open space and is located in the southwestern corner 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 in the southeastern portion of the site, adjacent to Building K, as well as in the northwestern portion of the site, adjacent to the basketball/tennis and handball courts. 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 childcare, recreation, enrichment, sports together (CREST) and School Age Programs, which provide morning care and after-school childcare, do occur outside of normal school operating hours, typically before school and after school until 6:00 p.m.

Under current conditions, community use of school facilities typically occur following the end of operation hours at the school, which is generally after 3:00 p.m. during the week and from 9:00 a.m to 5:00 p.m. Pacific standard time and 6:00 p.m. Pacific daylight time on weekends (City of Santa Monica 2020). 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.

2.4.4 Historic District

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

The historic district was found eligible for listing[1] within the context of the Public Works Administration (PWA) development of school campuses in the post-Long Beach Earthquake years of the 1930s and for its PWA Moderne design by notable architects Marsh, Smith & Powell. Details of the contributing components (six contributing buildings, five site features, and two additional features) of the historic district, which are listed in **Table 2-2**, with photographs of the features shown in **Figure 2-4** and their locations are shown in **Figure 2-5, Historic District Map**.

TABLE 2-2: FEATURES INCLUDED IN THE HISTORIC DISTRICT

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

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

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 flat roofs 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.

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

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 flat roofs 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 soccer green and track athletic field and rear paved area, is present along the west elevation. The building was expanded with additions constructed in 1951 and 1968.

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 flat roofs 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 and is connected to Buildings E, H, J, and K via a series of canopied outdoor corridors with flat roofs and wide eaves upheld by steel pipe columns.

Building J (Administration Offices/Classroom)

Building J was constructed in 1935 and designed by architects Marsh, Smith, and Powell. The structure is located between Buildings H and K and is connected to Buildings E, G, H, and K via a series of canopied outdoor corridors with flat roofs 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 flat roofs 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.

Site 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 used 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 Building E and Buildings 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 occupies the courtyard formed by 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 1 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).

Additional Features

"Theodore Roosevelt" Panel

This stone relief panel was completed by the WPA and installed during the school's construction 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 and is located between Building J and H. The plaque was completed by the WPA.

2.5 DESCRIPTION OF PROPOSED PROJECT

2.5.1 Proposed Project Development

As mentioned, Roosevelt Elementary School campus was constructed beginning in 1935. The majority of the buildings are approaching 90 years old and were constructed consistent with the education philosophy of the time. In consideration of the school's historic value, the Proposed Project would balance 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 team-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 other functions by rearranging the moveable furniture.

- Larger multipurpose spaces in the auditorium, cafeteria, and library, 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 to be better integrated and connected with indoor learning spaces.

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

- Preservation of the historic quality and character of the school by maintaining 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 four 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. Refer to **Figure 2-6**, **Campus Plan Site Layout** showing the Proposed Project facilities

The proposed improvements would require removal of 14 existing trees on the school campus. All removed trees are located within the school campus and do not include any street trees within the public right-of-way. The trees proposed for removal consist of: seven Queensland pittosporum (*Auranticarpa rhombifolia);* three citrus trees; two Peruvian pepper trees (*Schinus molle)*; one camphor tree (*Cinnamomum camphora)*; and one carob tree (*Ceratonia siliqua)*. All trees to be removed are ornamental and are part of the existing onsite landscaping. As all such trees are non-native species, they do not represent sensitive biological resources.

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 2-3**, **Summary of Proposed Project's Total Development** and shown on **Figure 2-6**.

TABLE 2-3. SUMMARY OF PROPOSED PROJECT'S TOTAL DEVELOPMENT

Campus Area (Existing Structure or Proposed Campus Plan)	Proposed Campus Plan Activity	Existing Size	Final Conditions (Existing to Remain and Proposed Campus Plan)	Max Height (Existing/New) Under Proposed Campus Plan
Phase 1				
Building K (Transitional-Kindergarten (T-K)/ Kindergarten and Outdoor Play Areas)	Demolition of Existing and New Construction	2,452 SF (two classrooms to be demolished)	11,450 SF (seven classrooms at 1,350 SF/classroom and 1,600 SF teacher collaboration room, 400 SF storage/utility room and restrooms)	32 feet
Three Portable Buildings (north of Building K and southeast of Building J)	Demolition	2,880 SF total (~960 SF each)	--	--
Library	New Construction	2,639 SF	4,900 SF	32 feet
Phase 2				
Sports Fields	Demolition and New Construction	U8	U8	--
Parking	Demolition and New Construction	48 spaces	67 spaces (if surface lot) or 165 spaces (if sub-grade lot)	--
Four Portable Buildings (southwest of basketball/ tennis courts)	Demolition	3,840 SF (~960 SF each)	--	--
Phase 3				
One Restroom Building (along 9th Street)	Demolition	510 SF	--	--
Building C (along 9th Street)	Demolition of Existing and New Construction	5,197 SF (~890 SF/ classroom)	21,800 SF (1,200 SF/16 classrooms)	32 feet
Cafeteria/Kitchen Building (along 9th Street)	New Construction	4,405 SF	6,000 SF	32 feet
Phase 4				
Building B (central campus area, north of the North Courtyard)	Demolition	3,915 SF	--	--

TABLE 2-3, CONTINUED

Campus Area (Existing Structure or Proposed Campus Plan)	Proposed Campus Plan Activity	Existing Size	Final Conditions (Existing to Remain and Proposed Campus Plan)	Max Height (Existing/New) Under Proposed Campus Plan
Building D (Cafeteria)	Demolition	4,405 SF	--	--
Five Portable Buildings (north of Building B)	Demolition	4,800 SF (~960 SF/each)	--	--
Auditorium (along Lincoln Boulevard)	New Construction	(Existing 4,963 SF Auditorium to be demolished during Phase 5)	5,500 SF	32 feet
Maker Space & Teaming Area (central campus area)	New Construction	--	12,400 SF	32 feet
Addition to and Renovations to Building A	New Construction and Renovations	--	4,800 SF	32 feet
Phase 5				
Building H (Auditorium)	Demolition	4,963 SF	--	24 feet
Building G	Partial Demolition	800 SF	--	16.5 feet
Entryway (along Montana Avenue)	New Construction	--	--	--
South Courtyard	Renovation	--	--	--
Building E	Renovation	4,861 SF	4,861 SF	16.5 feet
Building J (Administrative Building)	Renovation	4,435 SF	4,435 SF	16.5 feet

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 and a new library on the eastern corner of the site. The improvements would include construction of a dedicated outdoor space, as well as a separate drop-off/pickup for the TK/K students along 9th Street. The proposed activities include demolishing the existing classroom building (Building K), three portable buildings, and playground, which would be replaced by an 11,450 -square-foot 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 Educational Specifications.

  Phase 1 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 4,900 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. Once the new library is completed and operational then the space used for the existing library (in Building A) would be renovated into a teaming area until the Phase 4 expansion work. 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, reconfiguration of the U8 playfield, and relocation of the parking lot. The U8 playfield would be reoriented at the northwestern portion of the campus immediately south of the new parking lot and along Lincoln Boulevard near its intersection with Alta Avenue. The reconfiguration 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 northern boundary of the campus along the span of Alta Avenue to efficiently use the northern portion of the campus and increase the parking capacity by 19 spaces (for a total of 67 spaces) to meet existing needs. The parking lot may potentially be reconstructed as a below-grade lot under the playfield, which would result in a 117-space increase in campus parking (for a total of 165 spaces).

- Phase 3 focuses on the construction of new 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. The dining area 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, and the 510-square-foot restroom building along 9th Street 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 five portable structures currently located at the central portion of the campus immediately north of Building B; and Building D, which houses the cafeteria and located along Lincoln Boulevard. In 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 would provide two maker “studios” designed to accommodate 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 in Building D. Phase 4 would also include Building A renovations and addition of 4,800 square feet of teaming rooms at its northern end.

- Phase 5 involves demolition of the Building H, which houses the 4,963-square-foot auditorium, and partial demolition of Building G. Construction activities include renovation of Building E (classrooms) and Building J (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/drop-off area for the children and would enhance the integration of the school with the community.

2.5.2 Construction Schedule and Activities

The estimated construction schedule for each phase is shown in **Table 2-4**. Construction work would intensify during summer and outside of regular school hours when class is not in session. However, construction would nonetheless occur during the school session and during school days. Below is the most aggressive possible schedule. An actual schedule will depend on the availability of funding and would likely be extended.

TABLE 2-4. 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

Construction of the Proposed Project would temporarily generate additional traffic, specifically construction workers traveling to and from the campus and delivery trips associated with construction equipment and materials, on the existing area roadway network. During the timeframes when construction occurs while school is in session, construction traffic would be scheduled in coordination with school operations, such that trucks are not moving in or out during drop-off or pick-up times. Construction workers would park in the onsite staging area or if needed, along local roadways where public parking is allowed, to provide adequate parking for all employees and visitors to the campus throughout the duration of construction activities. Construction staging for each phase of the Proposed Project would generally be confined to each phase area. If needed, a designated area for equipment and material storage and stockpiling would be delineated on the campus.

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 construction workers to arrive on campus and begin prior to the arrival period of students. As a condition of the permit, the District will notify persons occupying property within 500 feet of the proposed construction activity prior to commencing work under the permit.

2.5.3 Operational Schedule and Activities

The Campus Plan would not increase the capacity or change the attendance boundaries of Roosevelt Elementary School. School hours would remain the same as existing hours, from 8:00 a.m. to 3:00 p.m., with staff and students arriving on campus between approximately 7:00 a.m. and 8:00 a.m. and leaving between approximately 3:00 p.m. and 6:00 p.m. After-school activities and staff work at the campus would continue to occur until approximately 7:00 p.m., Monday through Friday during the school year.

2.6 REQUIRED PERMITS AND APPROVALS

As required by CEQA Guidelines section 15124(d), this section provides, to the extent the information is known to the District, a list of the agencies that are expected to use the environmental analysis of the Proposed Project in their decision-making. This section also lists the permits and other approvals required to implement the Proposed Project.

Lead Agency Approval

As mentioned in **Section 1.0**, SMMUSD is the lead agency under CEQA and is carrying out the Proposed Project. In order to approve the Proposed Project, the SMMUSD Board must first certify the Final Environmental Impact Report (Final EIR) and adopt the Project Mitigation Monitoring Reporting Program (MMRP), findings, and a statement of overriding considerations. The SMMUSD Board will consider the information in the EIR when making its decision to approve or deny the Proposed Project or in directing modifications to the Proposed Project based on its review of the EIR's findings and mitigation measures. The EIR is intended to disclose to the public the Proposed Project's details, analyses of the Proposed Project's potential environment impacts, and identification of feasible mitigation or alternatives that would lessen or reduce significant impacts to less-than-significant levels.

Other Required Permits and Approvals

The following are a list of anticipated permits and approvals from state, regional, and local agencies:

- State of California
- California Department of General Services, Division of the State Architect (construction plan review and approval)
- State Water Resources Control Board's General Permit for Storm Water Discharges Associated with Construction and Lan Disturbance Activities (Order No. 2010-014-DWQ)
- South Coast Air Quality Management District (Fugitive Dust Control Plan)
- City of Santa Monica
- Community Development Department Building and Safety Division (for grading permit and noise permit)
- Santa Monica Fire Department and Police Department (Approval of Site Plan for Emergency Access)
- Construction traffic control plan

Project Location

0 2.5 5 10 Miles

Michael Baker INTERNATIONAL

File: 195838Figures.indd

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

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Regional Vicinity Map

Figure 2-1A

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Local Vicinity Map

Figure 2-1B

Michael Baker INTERNATIONAL

Not to Scale

File: 195838Figures.indd

Source: Google Earth, 2023

This page intentionally left blank.

Michael Baker INTERNATIONAL

File: 195838Figures.indd

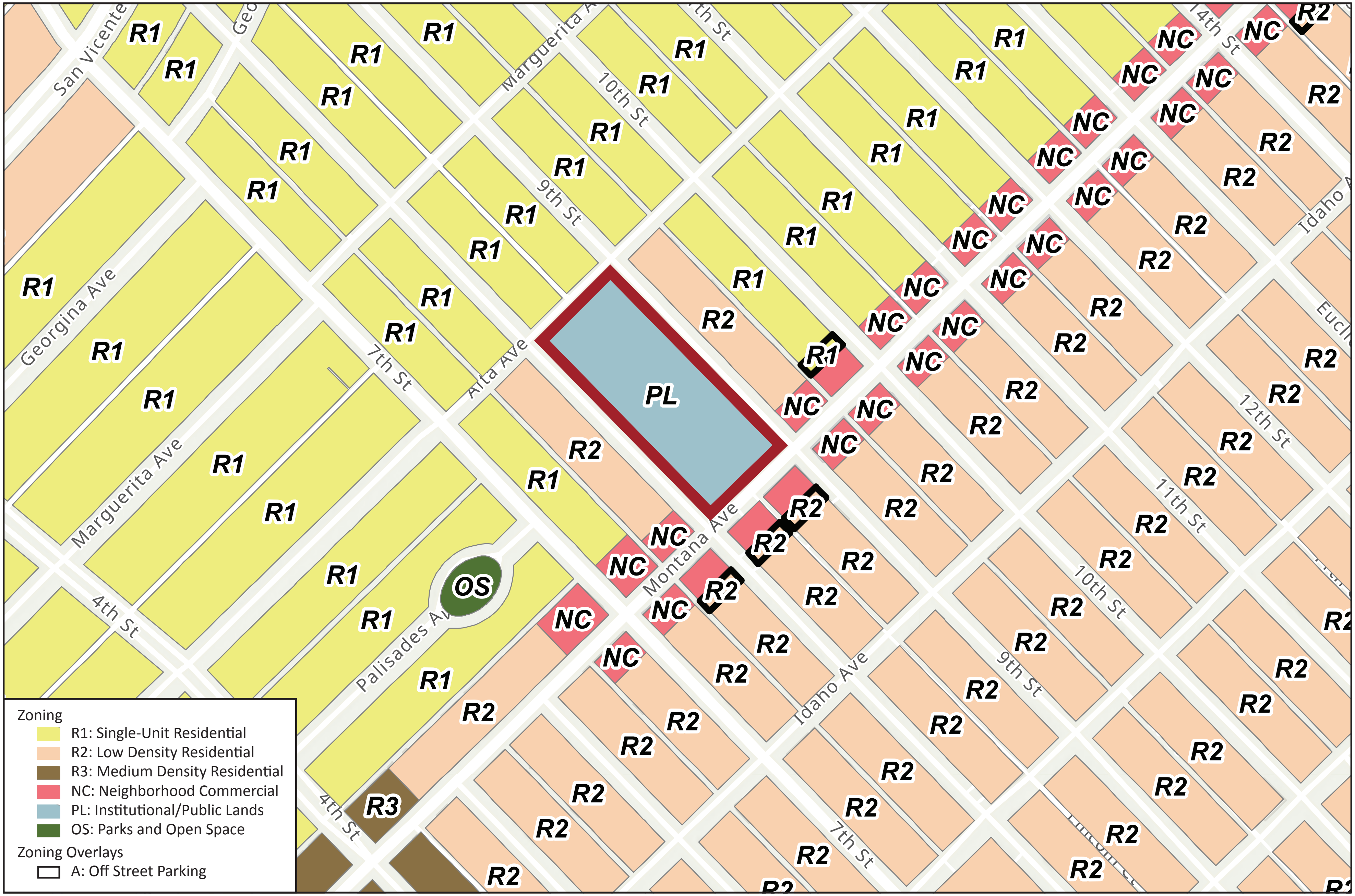
ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Existing General Plan Land Use

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

Figure 2-2A

This page intentionally left blank.



Project Boundary

Not to Scale

Michael Baker INTERNATIONAL

File: 195838Figures.indd

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

This page intentionally left blank.

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Not to Scale

Source: dsk architects, 2020

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Existing Campus Facilities

Figure 2-3

This page intentionally left blank.

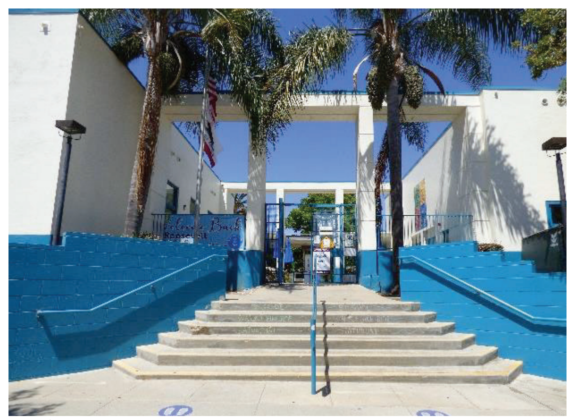
Building A - South View


Building E - Northeast View


Building B - North View


Building G - West View


Building C - Southwest View


Buildings D and H - Entrance Courtyard


Building D - North View


Buildings H and J - North View

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Photographs - Existing School Campus

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Source: Historic Resources Group, 2022

Figure 2-4A

This page intentionally left blank.


Building K - East View


Brick Flagpole Ring. East View.


Lincoln and Montana Quad - North View


Brick Wall. North View.


South Courtyard - East View


"Theodore Roosevelt" Panel, c. 1935


North Courtyard - Southwest View

WPA Bronze Plaque, 1940

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Photographs - Existing School Campus

Source: Historic Resources Group, 2022

Figure 2-4B

This page intentionally left blank.

Michael Baker INTERNATIONAL

N NOT TO SCALE

Source: Historic Resources Group, 2022

ROOSEVELT ELEMENTARY SCHOOL CAMPUS PLAN EIR

Historic District Map

Figure 2-5

This page intentionally left blank.

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Not to Scale

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

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Campus Plan Site Layout

Figure 2-6

This page intentionally left blank.

Michael Baker
INTERNATIONAL

File: 195838Figures.indd

Source: DSK Architects; Moore Ruble Yudell, 2023

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Proposed Kindergarten

Figure 2-7A

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Proposed Cafeteria and Auditorium

Figure 2-7B

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Source: DSK Architects; Moore Ruble Yudell, 2023

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Proposed Central Courtyard and Makerspace

Figure 2-7C

Source: DSK Architects; Moore Ruble Yudell, 2023

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Proposed South Courtyard

Figure 2-7D

Source: DSK Architects; Moore Ruble Yudell, 2023

Michael Baker INTERNATIONAL

File: 195838Figures.indd

This page intentionally left blank.

The following subsections of the EIR contain a detailed environmental analysis of the existing conditions, the Proposed Project's impacts (including direct and indirect, short term and long term, and cumulative, where applicable), recommended mitigation measures, and unavoidable adverse impacts.

The EIR examines the following environmental factors outlined in Appendix G, Environmental Checklist, of the CEQA Guidelines:

- 3.1 Aesthetics
- 3.2 Air Quality
- 3.3 Cultural Resources
- 3.4 Energy
- 3.5 Geology and Soils
- 3.6 Greenhouse Gas Emissions
- 3.7 Hazards and Hazardous Materials
- 3.8 Noise
- 3.9 Transportation and Traffic
- 3.10 Tribal Cultural Resources

Each environmental issue is addressed in a separate Section of the EIR and is generally organized into subsections, as follows:

- ***Environmental Setting*** describes the physical conditions existing at the time of publication of the NOP that may influence or affect the issue under investigation.
- ***Regulatory Framework*** describes the federal, state, regional, and/or local regulations and plans that are relevant to the Proposed Project.
- ***Thresholds for Determination of Significance*** provides the thresholds that are the basis of conclusions of significance, which are primarily the criteria provided in Appendix G, Environmental Checklist, of the CEQA Guidelines.

  Major sources used in crafting criteria include the CEQA Guidelines; local, state, federal, or other standards applicable to an impact category; and officially established significance thresholds. "An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting" (CEQA Guidelines, § 15064[b]). Principally, "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance" constitutes a significant impact (CEQA Guidelines, § 15382).

- ***Analysis of the Proposed Project's Effects and Determination of Significance*** evaluates the Proposed Project's environmental impacts in consideration of all phases, including planning, acquisition, development, and operation. This subsection also discusses the potential changes to the existing physical environmental conditions, which may occur if the Proposed Project is implemented. Evidence, based on factual and scientific data, is presented to show the cause-and-effect relationship between the Proposed Project and the potential changes in the environment. All potential direct and reasonably foreseeable indirect effects are considered. The exact magnitude, duration, extent, frequency, range, or other parameters are ascertained, to the extent possible, to determine their significance. Direct and indirect significant effects of the Proposed Project on the environment are identified and described, giving due consideration to short-term and long-term effects.

- ***Mitigation Measures*** are the Project-specific measures that would be required of the Proposed Project in order to avoid or minimize a significant adverse impact; rectify a significant adverse impact by restoration; reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or compensate for the impact by replacing or providing substitute resources or environment.

- ***Cumulative Impact Analysis*** describes potential environmental changes to the existing physical conditions that may occur as a result of the Proposed Project, together with all other reasonably foreseeable, planned, and approved future projects producing related or cumulative impacts (see also discussion below).

Assumptions Regarding Cumulative Impacts

Cumulative impacts are defined in the CEQA Guidelines (section 15355) as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." A cumulative impact occurs from a "change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time." Consistent with CEQA Guidelines section 15130(a), the discussion in this EIR focuses on the identification of any significant cumulative impacts and, where present, the extent to which the Proposed Project would constitute a considerable contribution to the cumulative impact. CEQA Guidelines section 15130(b) states the following:

> The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

Cumulative Impact Methodology

To identify the projects to be analyzed in the evaluation of cumulative impacts, CEQA Guidelines section 15130(b) requires that an EIR employ one of the following:

A. **List Approach** - Entails listing past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside of the control of the agency; or,

B. **Projection Approach** - Uses a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

Past projects include those land uses that have been previously developed and comprise the existing environment. Present projects include those projects recently approved or under construction. Probable future projects are those that are reasonably foreseeable, such as those for which an application is on file and in process with a local planning department.

The approach and geographic scope of the cumulative impact evaluation vary depending on the environmental topic area being analyzed. The individual cumulative impacts discussion in the Section addressing each environmental topic presents relevant impacts and mitigation measures for the Proposed Project. **Table 3-1**, **Cumulative Projects List**, provides a summary of cumulative projects considered in the impact analysis. The relative location of the cumulative projects considered are shown in **Figure 3-1**, **Cumulative Projects**. Projects considered for study include several other schools within the SMMUSD where similar upgrades to the existing campuses are being planned to ensure that the school facilities align with the District's Educational Specifications. These schools include Franklin Elementary School, Grant Elementary School, John Adams Middle School, McKinley Elementary School, and Lincoln Middle School; however, none of these schools lie within one-half mile of Roosevelt Elementary School.

TABLE 3-1
CUMULATIVE PROJECTS LIST

Land Use Category	Map #	Reference	Address/Location	Description	Status
Education	20	Franklin Elementary School Campus Plan	2400 Montana Avenue	• 24,685 SF increased classrooms and storage • Remove and demolish 8 buildings and 9 portable buildings • Construct 3 new buildings and renovate 2 buildings and outdoor areas	CEQA review in process
Education	33	Grant Elementary School Campus Plan	2368 Pearl Street	• Removal of 10 modular classrooms, playground, restrooms, and shade structures • Demolition of a portion of 1 permanent building • Renovation of existing library and kindergarten classroom building • Construction of 2 new buildings • New hardscape • Reconfigured playgrounds and field	Approved
Education	30	John Adams Middle School Campus Plan	2425 16th Street	• Demolition of 1 existing building • Renovation of 6 existing buildings • Upgrades to the existing library and courtyard • Construction of new building • New hardscape	Approved
Education	26	McKinley Elementary School Campus Plan	2401 Santa Monica Boulevard	• Demolition of several existing structures • Renovation of remaining structures • Construction of 2 new buildings and outdoor facilities • Improvements to outdoor recreational areas • Circulation improvements	Approved
Education	3	Lincoln Middle School Campus Plan	1501 California Avenue	• Construction of new buildings • Renovation of existing buildings • Renovation and reconstruction of sports facilities • Outdoor improvements	Approved

TABLE 3-1, CONTINUED

Land Use Category	Map #	Reference	Address/Location	Description	Status
Medical	9	1901 Wilshire Boulevard	1901 Wilshire Boulevard	• New Tier 2 medical office building • 22,424 total SF • 3 stories (41 feet) • 28 parking spaces (adjacent parcel)	ARB Concept Review: TBD PC Hearing: TBD
Medical	22	Providence Saint John's Health Center (PSJHC) Phase Two Project Master Plan / PSJHC Phase Two on North and South Campuses	2121 Santa Monica Boulevard	• 669,150 SF above-grade floor area • Maximum height 105 feet • Wellness/healthcare/research facilities • Subterranean parking • Open space areas • Visitor housing • Minimum of 10 replacement multi-family housing units • New facilities for Providence's existing Santa Monica Cancer Institute and Child and Family Development Center • May be phased over 17 years	
Medical	16	1242 20th Street Wellness Center Project	1242 20th Street	• 7,965 SF adaptive reuse of existing funeral home and chapel building • 59,548 SF new wellness center • 218 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	8	1437 7th Street	1437 7th Street	• Mixed-use residential over ground floor commercial / retail • 53,156 SF residential use (65 units) • 6,844 SF commercial • 8 stories (84 feet) • 77 parking spaces	ARB Concept Review: 12/17/18 Pending: 16ENT-0175 under Staff Review. (18ENT-0136 denied)
Mixed Use and Commercial	17	525 Colorado Avenue	525 Colorado Avenue	• Mixed-use residential over ground floor commercial / retail • 29,979 total SF • 26,980 SF residential use (40 units) • 6,969 SF commercial • 7 stories (84 feet)	Pending / Under Staff Review

TABLE 3-1, CONTINUED

Land Use Category	Map #	Reference	Address/Location	Description	Status
Mixed Use and Commercial	2	1101 Wilshire Boulevard	1101 Wilshire Boulevard	• Commercial space at ground floor, residential apartments on upper stories, subterranean garage parking • 6 stories (64 feet) • 68,310 total SF • 6,800 SF commercial • 61,510 SF residential (93 units) • 125 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	31	2601 Lincoln Boulevard	2601 Lincoln Boulevard	• Mixed-use housing with ground floor commercial and residential units above • 955,120 total SF • 5 stories (65 feet) • 30,870 SF commercial • 426,460 SF residential (521 units) • 850 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	27	2600 Wilshire Boulevard	2600 Wilshire Boulevard & 1215 26th Street	• Mixed-use housing with ground floor commercial and residential units above w/ 2-story affordable housing building • 55,435 total SF • 4 stories (55 feet) • 12,707 SF commercial • 42,484 SF residential (44 units) • 98 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	6	825 Santa Monica Blvd	825 Santa Monica Boulevard	• Mixed-use housing with ground floor commercial and residential units above • 74,428 total SF • 7 stories (81 feet) • 3,360 SF commercial • 71,068 SF residential (99 units) • 120 parking spaces	Pending / Under Staff Review

TABLE 3-1, CONTINUED

Land Use Category	Map #	Reference	Address/Location	Description	Status
Mixed Use and Commercial	12	1902 Wilshire Boulevard	1902 Wilshire Boulevard	• Mixed-use housing with ground floor commercial and residential units above • 114,132 total SF • 8 stories (85 feet) • 6,381 SF commercial • 92,496 SF residential (140 units) • 196 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	14	1527 Lincoln Boulevard	1527 Lincoln Boulevard	• Mixed-use housing with ground floor commercial and residential units above • 158,469 total SF • 8 stories (85 feet) • 8,109 SF commercial • 150,360 SF residential (210 units) • 294 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	21	1420 20th Street	1420 20th Street	• Mixed-use housing with ground floor commercial and residential units above • 63,706 SF total • 6 stories (68 feet) • 4,908 SF commercial • 58,798 SF residential (50 units) • 62 parking spaces	ARB Concept Review: TBD PC Hearing: TBD
Mixed Use and Commercial	19	Mixed use housing project at 407 Colorado Avenue/1553-1555 4th Street	407 Colorado Avenue/1553-1555 4th Street	• Mixed-use housing project • 44,697 SF total • 60 residential units • 6,883 SF commercial	Pending / Under Staff Review

TABLE 3-1, CONTINUED

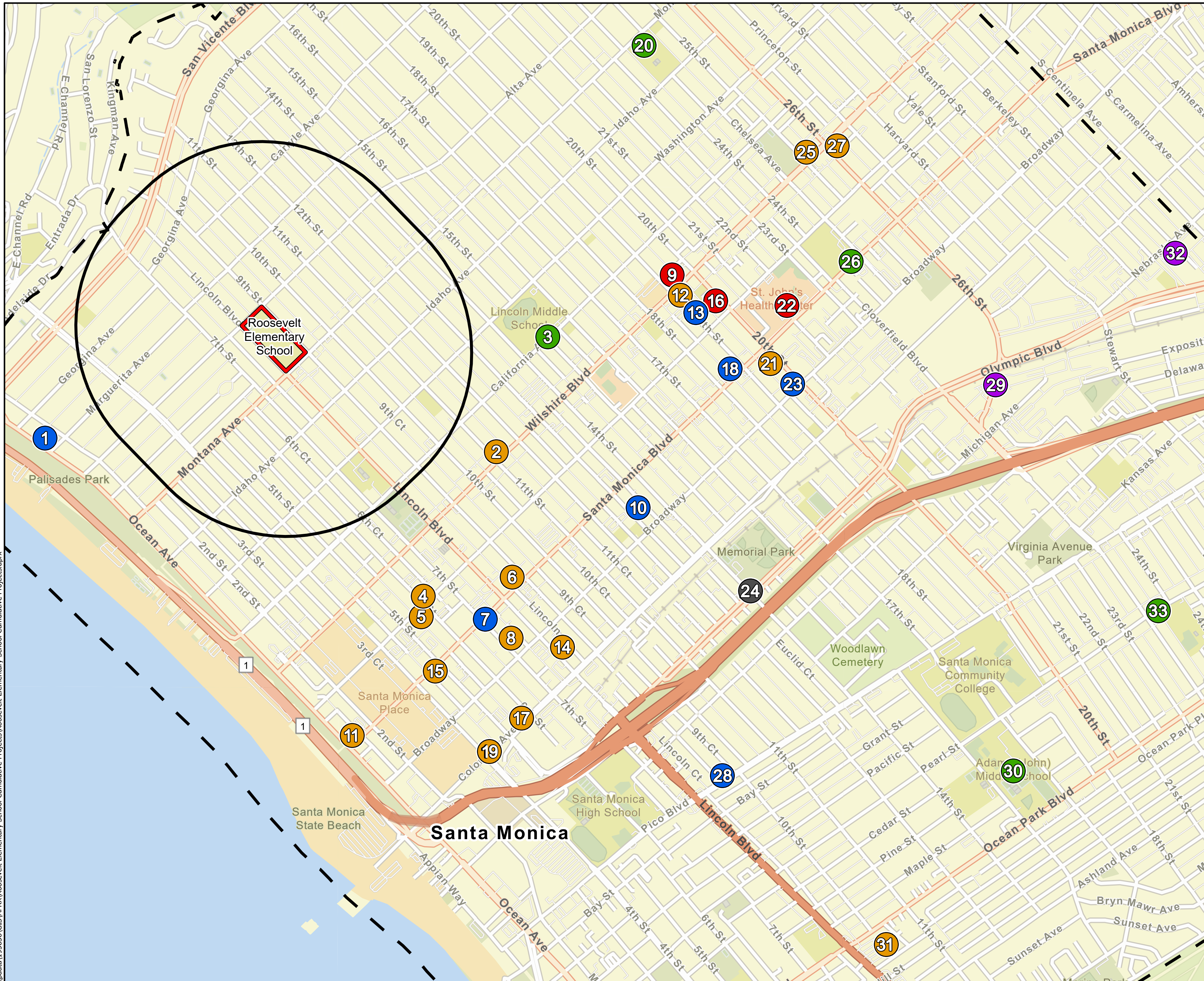
Land Use Category	Map #	Reference	Address/Location	Description	Status
Mixed Use and Commercial	25	Mixed Use Development	2501 Wilshire Boulevard	• Mixed-use development • 4 stories (50 feet) • 18,980 SF commercial • 71 residential units • 12 additional affordable units provided offsite	Pending / Under Staff Review
Mixed Use and Commercial	5	Mixed Use Development	528 Arizona Avenue	• Mixed-use development • 64,438 SF total floor area ○ 80 residential units (24 affordable, 7 onsite and 17 offsite at 1333 7th Street) ○ 6,633 SF commercial space • Two levels of subterranean parking • 6 stories • 74 parking spaces	Pending / Under Staff Review
Mixed Use and Commercial	4	603 Arizona Avenue	603 Arizona Avenue	• 6-story hotel • 19,168 total SF • 8 stories (59 feet) • 26 parking spaces	ARB Concept Review: TBD PC Hearing: TBD
Mixed Use and Commercial	11	Ocean Avenue Project First Court Promenade Pedestrian Mall	101 Santa Monica Boulevard. 129 Santa Monica Boulevard, 1327 Ocean Avenue, 1333 Ocean Avenue, and 1337 Ocean Avenue	• Approx. 316,750 SF of total floor area ○ 120-room hotel ○ 100 apartments (including 25 affordable and 11 rent-controlled units) ○ 35,500 SF cultural uses campus ○ 36,100 SF restaurants/retail • Open space; publicly accessible rooftop observation deck • 285 subterranean parking spaces • Onsite repositioning and rehabilitation of 2 City-designated landmarks	Pending / Under Staff Review

TABLE 3-1, CONTINUED

Land Use Category	Map #	Reference	Address/Location	Description	Status
Mixed Use and Commercial	15	The Plaza at Santa Monica Project	4th and 5th Streets/ Santa Monica Boulevard	• Demolition of existing bank branches and parking lots • 17,800 SF ground level Grand Public Plaza; smaller plaza at 5th and Arizona • Two ground level pocket parks • 11,000 SF second level public park • 12,000 SF cultural amenity • 48 affordable housing units either onsite or the contribution of funds towards affordable housing offsite • 41,300 SF ground floor retail • 240-room hotel • 106,800 SF feet of creative workspace • 1,700 SF bike center with 3,500 SF of below grade bicycle storage • 39,100 SF of unenclosed elevated exterior decks	Pending / Under Staff Review
Office	29	1745 26th Street	1745 26th Street	• Office building • 26,800 total SF • 4 stories (55 feet) • 54 parking spaces	ARB Concept Review: TBD PC Hearing: TBD
Office	32	3122 Nebraska Avenue	3122 Nebraska Avenue	• Creative office addition to existing office building • 38,352 total SF • 3 stories (46 feet) • 99 parking spaces	ARB Concept Review: TBD PC Hearing: TBD
Residential	13	1215 19th Street	1215 19th Street	• Affordable housing project • 29,690 total SF • 18,593 SF residential use (34 units) • 6 stories (60 feet)	Pending / Under Staff Review
Residential	7	700 Santa Monica Boulevard	700 Santa Monica Boulevard	• Residential project • 96,920 total SF • 8 stories (85 feet) • 99 Units	Pending / Under Staff Review

TABLE 3-1, CONTINUED

Land Use Category	Map #	Reference	Address/Location	Description	Status
Residential	28	901 Pico Boulevard	901 Pico Boulevard	• Residential project • 39,716 total SF • 5 stories (47 feet) • 22,806 SF residential use (45 units) • 20 parking spaces	Pending / Under Staff Review
Residential	23	1925 Broadway	1925 Broadway	• Residential project • 322,704 total SF • 11 stories (119 feet) • 322,704 SF residential use (240 units) • 240 parking spaces	Pending / Under Staff Review
Residential	18	1819 Santa Monica Boulevard	1819 Santa Monica Boulevard	• Residential project • 117,399 total SF • 114,699 SF residential use (143 units) • 8 stories (85 feet) • 184 parking spaces	Pending / Under Staff Review
Transportation/ Mixed-Use	24	Memorial Park Neighborhood Plan	Colorado Avenue from Lincoln to 20th Street; 17th Street from Wilshire Blvd to Pico Boulevard	Development of planning area adjoining the Memorial Park light-rail stop at 17th Street, to the creative arts district at Bergamot to the east, two large hospital complexes to the north, and the Pico neighborhood and Santa Monica College to the south. The goal for the MPNP is to direct change for this formerly industrial area adjacent to an active recreation park towards low-scale, live-work, and mixed uses to conserve existing high-skill jobs and attracts new residents, local-serving retail uses, and to enhance transit use to reduce dependency on automobiles	Pending / Under Staff Review



H:\pdata\195838\GIS\APRX\Roosevelt Elementary School Cumulative Projects\Roosevelt Elementary School Cumulative Projects.aprx

Education

- 3 1501 California Avenue / Lincoln Middle School Campus Plan
- 20 2400 Montana Avenue / Franklin Elementary School Campus Plan
- 26 2401 Santa Monica Boulevard / McKinley Elementary School Campus Plan
- 30 2425 16th Street / John Adams Middle School Campus Plan
- 33 2368 Pearl Street / Grant Elementary School Campus Plan

Mixed Use and Commercial

- 2 1101 Wilshire Blvd
- 4 603 Arizona Ave
- 5 528 Arizona Ave
- 6 825 Santa Monica Blvd
- 8 1437 7th Street
- 11 Ocean Avenue Project - First Court Promenade Pedestrian Mall
- 12 1902 Wilshire Blvd
- 14 1527 Lincoln Blvd
- 15 The Plaza at Santa Monica Project
- 17 525 Colorado Ave
- 19 407 Colorado Ave
- 21 1420 20th St
- 25 2501 Wilshire Blvd
- 27 2600 Wilshire Blvd
- 31 2601 Lincoln Blvd

Medical

- 9 1901 Wilshire Blvd
- 16 1242 20th Street Wellness Center
- 22 Providence Saint John's Health Center

Office

- 29 1745 26th St
- 32 3122 Nebraska Ave

Residential

- 1 423 Ocean Avenue Project
- 7 700 Santa Monica Blvd
- 10 1433 Euclid St
- 13 1215 19th St
- 18 1819 Santa Monica Blvd
- 23 1925 Broadway
- 28 901 Pico Blvd

Transportation

- 24 Memorial Park Neighborhood Plan

Roosevelt Elementary School Campus Boundary | Half-Mile Radius | City of Santa Monica Municipal Boundary

Michael Baker INTERNATIONAL

0 0.13 0.25 Miles

Source: Esri Community Maps Contributors, County of Los Angeles, California State Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS

ROOSEVELT ELEMENTARY SCHOOL
SANTA MONICA, CA

Cumulative Projects

Figure 3-1

This page left blank intentionally.

3.1 AESTHETICS

This section evaluates potential aesthetics and visual resources impacts that may result from construction and/or operation of the Roosevelt Elementary School Campus Plan (Proposed Project). The following discussion addresses the existing aesthetic and visual resources conditions of the affected environment; identifies and analyzes environmental impacts; and identifies mitigation measures to reduce or avoid adverse impacts anticipated with implementation of the Proposed Project, as appropriate.

The analysis in this section is largely based on the Roosevelt Elementary School Campus Plan prepared by dsk Architects and Moore Ruble Yudell (2023) and the Historical Resources Technical Report prepared by Historic Resources Group (September 2024; see **Appendix B.2**). Information from these documents is incorporated by reference herein.

3.1.1 ENVIRONMENTAL SETTING

The term "aesthetics" refers to the overall visual environment associated with a project site, neighborhood, or area, which may be composed of natural features or created urban features. Urban features that may contribute to an aesthetic character or image can include structures of architectural or historical significance or visual prominence; landscape features of visual interest, sometimes called scenic resources; public plazas, art, or gardens; or larger features of the built landscape, such as iconic buildings, city skylines, streetscape elements, sidewalks, parkways, or signage that provide historic context or consistency of appearance.

The term "views" generally refers to visual access to, or the visibility of, a particular site from a given vantage point or corridor; it includes both focal views (e.g., views of a particular object, scene, setting, or feature of interest) and panoramic views (e.g., views of a large geographic area for which the view may be wide and/or extend into the distance).

Regional Setting

The Roosevelt Elementary School campus (Proposed Project site) is located in the City of Santa Monica in western Los Angeles County. To the north are the communities of Pacific Palisades and Brentwood in the City of Los Angeles; to the east are the community of Brentwood and cities of Beverly Hills and Culver City; to the south are the communities of Venice in the City of Los Angeles and Marina Del Rey in unincorporated Los Angeles County; and to the west is the Pacific Ocean.

The City is within a fully urbanized area and is surrounded on the north, east, and south by medium- and higher-density urban development. Largely uninterrupted urban development extends for approximately 3 to 4 miles north through the City and Pacific Palisades to the Santa Monica Mountains, south to Marina Del Rey and the Ballona Wetlands, and east continuously to downtown Los Angeles. Significant natural resources within and surrounding the City include the Santa Monica Mountains to the north and east and the Pacific Ocean to the west.

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 2019). The portion of this scenic highway nearest to the Proposed Project 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 southwest of the Proposed Project site at its closest point, is eligible for scenic highway status; however, it has not been formally designated as such. Due to the distance from these roadways and existing intervening topography and development, the Proposed Project site is generally not discernable within the existing visual landscape from a State scenic highway.

Local Setting

On both regional and local levels, the visual setting of the Proposed Project area is highly urbanized in nature, with the exception of the Santa Monica beaches, which are approximately 0.85 miles southwest of the Roosevelt Elementary School campus at the closest point. Accordingly, open space in the City is generally limited to public beaches and parks, school grounds, and developed greenbelts with limited natural and undeveloped land.

Views of the Pacific Ocean from within the City are primarily available from Palisades Park (a designated City landmark along Ocean Avenue) and the Pacific Coast Highway, both of which are southwest of the Proposed Project site. Views of the ocean are also available from many of the east–west trending streets. However, due to the presence of buildings and variations in topography, views of the ocean are limited or blocked entirely from many roadways in the City. Other visual resources include well-known places such as the beachfront areas, including the Santa Monica Pier (approximately 1.3 miles southeast of the Proposed Project) and vital commercial districts, such as the Third Street Promenade (less than 0.8 miles southeast of the Proposed Project site).

The school campus is bordered by 9th Street on the east/northeast, Montana Avenue on the south/southeast, Lincoln Boulevard on the west/southwest, and Alta Avenue on the north/northwest. 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 Santa Monica-Malibu Unified School District 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.

Proposed Project Setting

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. Under existing conditions, the school campus offers 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**, for additional details. **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 (see **Chapter 2**, **Project Description**).

The primary entrance to the campus is accessed through a pedestrian path along Montana Avenue between Buildings J and H. Administrative offices, along with classrooms, are located in

Building J in the south-central portion of the property, and the auditorium is located in Building H. The TK and kindergarten classrooms are located in the southeastern portion of the site in Building K, near the corner of 9th Street and Montana Avenue. Portable classrooms are in various locations on the campus. On-site parking is provided via a surface lot located in the northeastern portion of the site, with access from 9th Street.

Common open space on-site includes the South Courtyard, which is flanked by Building E on the north and Buildings G and J on the south and has a large swath of grass and several planted areas. The North Courtyard is framed by Buildings B, C, and E and similarly offers a large swath of grass and planted areas. The Lincoln and Montana Lawn also provides common open space and is located in the southwestern corner of the campus; this lawn is characterized by large swaths of lawn with several mature trees.

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 southeastern portion of the site, adjacent to Building K, as well as in the northwestern 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. The outdoor play areas have a number of shade structures.

Refer to **Figure 2-3, Existing Campus Facilities**, and **Figures 3.1-2A** and **3.1-3A,** which show the current campus layout and existing views of several on-site buildings.

Visual Setting

The current campus was developed in the mid-1930s following the 1933 Long Beach earthquake. Additional development on the campus subsequently occurred in the 1940s under the auspices of the Works Progress Administration and Public Works Administration (PWA). Overall, the buildings that comprise the campus generally reflect the PWA Moderne style of architecture, integrated with indoor and outdoor spaces and concrete patios adjacent to the classroom wings, which represented characteristics of the new Santa Monica Plan developed by the school's architects. The Santa Monica Plan generally emphasized natural light, fresh air, and immediate access to the outdoors; the arrangement of single-story classroom wings; and exterior corridors, outdoor patios, and landscaped courtyards.

Such construction centered the campus in the south-central portion of the property with PWA Moderne-style buildings on a finger-plan school plan. Buildings constructed in the 1930s and early 1940s were cohesively developed with new Moderne buildings specifically designed to withstand seismic events in the area.

Following World War II, development on the school campus occurred sporadically, with new construction focused within the western portion of the campus. Several buildings were added in 1951 to reorient the primary entrance to Lincoln Boulevard. During the 1960s, the original cafeteria was demolished, a new library was built, and a classroom was expanded. In the 1990s, a mix of permanent buildings, temporary buildings, and other supporting structures were added to better accommodate the growing student population. **Section 2.4.3**, **Existing Conditions**, of this EIR, provides a detailed description of the existing buildings on the school campus.

As described in **Section 2.4.4**, **Historic District**, of this EIR, the existing campus buildings are older institutional structures that are either one or two stories in height. The structures are clad in smooth stucco capped with flat roofs with metal coping. The buildings generally exhibit awning steel-framed windows; entryways are generally single or double single-glazed metal slab doors, typically flanked by awning windows.

Due to the existing layout of the campus, combined with landscaping and vegetation along the campus perimeter, a number of the interior buildings and courtyards (i.e., North Courtyard and South Courtyard) are not readily visible from adjacent public streets that border the property. Views along Montana Avenue into the site are generally of the school buildings, including the TK/K facilities (Building K) and associated playgrounds, as well as the Lincoln/Montana Lawn. Views along Lincoln Boulevard are generally dominated by the existing school buildings (Buildings H, D, A, and portables), as well as the athletic courts (tennis) in the northwestern portion of the campus. Views from Alta Avenue are generally of the athletic facilities (tennis courts, soccer field), other interior courts (handball), and the surface parking lot. Views along 9th Street consist of the school buildings (Building C and portables), along with the surface parking lot in the northeastern portion and the TK/K facilities (Building K) and associated play yards in the southeastern portion.

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

Views of the Proposed Project Site from Surrounding Public Locations

Public viewing points and/or other viewing angles were selected and are identified on **Figure 3.1-1**, **Proposed Site Plan**. These locations are considered representative views of the site. Views from private lands (i.e., adjacent residential uses) are not considered under CEQA and are, therefore, not required to be analyzed. The views selected consider the degree of visibility, number of potential viewers, and consideration of the goals and policies in the City's General Plan.

Public Viewpoint 1: View Looking North from Montana Avenue (Front Entrance)

Figure 3.1-2A, **Existing Front Entrance**, depicts the existing view along Montana Avenue, looking north into the campus. Under current conditions, this view is composed of several campus buildings (portable classroom building and Building H), the front lawns, including the Lincoln and Montana Lawn, and Montana Avenue. Street parking is provided along Montana Avenue. Several mature trees are present within the landscape. As can be seen, these buildings exhibit varied painted murals on their southern and/or western façade. A pedestrian entryway extends from the sidewalk along Montana Avenue into the campus between Building H and two portable classroom buildings.

Public Viewpoint 2: Aerial View Looking Northeast from (Above) Montana Avenue/Lincoln Boulevard

Figure 3.1-3A, **Existing Aerial View**, depicts an existing aerial view looking northeast across the southern portion of the campus from a vantage point above Montana Avenue/Lincoln Boulevard. In the foreground are the existing Building H (auditorium), the Lincoln and Montana Lawn, and Building D (cafeteria and kitchen), all along Lincoln Boulevard; several portable classrooms are also present in the foreground. In the southeastern portion of the property is Building K (TK/K facilities), along with associated play areas. Other buildings (Buildings B, E, G, and J), as well as the South Courtyard and North Courtyard and outdoor athletic facilities, are also present in the middle ground from this vantage point. Pedestrian entryways along Montana Avenue and Lincoln Boulevard lead into the campus. Other school buildings (Building C and portables) in the north-central portion of the site are also visible. Street parking is present along the west side of Lincoln Boulevard. A number of mature trees are located in the Lincoln and Montana Lawn, along Lincoln Boulevard and Montana Avenue, and in the on-site interior courtyards.

This page intentionally left blank.

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Not to Scale

Source: DSK Architects; Moore Ruble Yudell, 2023

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Proposed Facility View

Figure 3.1-1

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Existing Front Entrance (View from Montana Avenue)

Figure 3.1-2A

Source: DSK Architects; Moore Ruble Yudell, 2023

Michael Baker INTERNATIONAL

File: 195838Figures.indd

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Proposed Front Entrance (View from Montana Avenue)

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Source: DSK Architects; Moore Ruble Yudell, 2023

Figure 3.1-2B

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Existing Aerial View (View from Montana Avenue/Lincoln Boulevard)

Source: dsk architects, A4E, SMMUSD - Roosevelt Elementary School Campus Assessment, Planning and Design Final Report - November 20, 2020

Figure 3.1-3A

This page intentionally left blank.

ROOSEVELT ELEMENTARY SCHOOL
CAMPUS PLAN EIR

Michael Baker INTERNATIONAL

File: 195838Figures.indd

Proposed Aerial View (View from Montana Avenue/Lincoln Boulevard)

Source: DSK Architects; Moore Ruble Yudell, 2023

Figure 3.1-3B

This page intentionally left blank.

3.1.2 REGULATORY SETTING

Federal

There are no federal regulations that apply to the Proposed Project with regard to aesthetic resources.

State

California Scenic Highway Program

California adopted a Scenic Highway Program (Streets and Highways Code section 260 et seq.) in 1963 to preserve and protect scenic highway corridors from change that would diminish the visual quality of areas that are adjacent to the highways. The scenic designation is based on the amount of natural landscape visible to motorists, the scenic quality of the landscape, and the extent to which development intrudes upon the motorist's enjoyment of the view. The Proposed Project site is not within the viewshed of any designated State scenic highway.

Local

It is anticipated that construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan. Per Government Code section 53094, it is anticipated that the District School Board would pass a Resolution to exempt the Roosevelt Elementary School Campus Plan from City of Santa Monica General Plan and zoning ordinance provisions, at the time when this EIR is certified. As such, the discussion of the City's General Plan and Zoning Ordinance is provided below as background information.

City of Santa Monica General Plan Land Use and Circulation Element

The City's General Plan does not contain an element that specifically addresses aesthetics or visual quality. However, the Land Use and Circulation Element (LUCE) includes several policies that relate to the development of the visual and architectural quality of the City. The LUCE includes objectives and policies related to the development of commercial corridors, residential neighborhoods, special districts, and public lands, as well as guidance in the areas of urban design and neighborhood participation. Policies identified in the LUCE that are applicable to projects in the City of Santa Monica are listed below.

- **Policy LU1.4:** Retention of Existing Structures. Encourage and incentivize preservation of historic structures and older buildings that add to the character of residential districts through the development of programs such as Transfer of Development Rights (TDR) and conservation easements.

- **Policy LU1.5:** Design Compatibility. Require that new infill development be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.

- **Policy LU4.5:** Art and Amenities. Foster creativity and the arts through programming uses and site improvements such as the provision of community spaces, public art, and creative design of public improvements.

- **Goal LU12:** Encourage Historic Preservation Citywide. Preserve buildings and features which characterize and represent the City's rich heritage.

- **Policy LU12.1:** Integration. Integrate the preservation of historic buildings into land use and planning practices.

- **Policy LU12.2:** Preservation Programs. Preserve and protect historic resources through the development of preservation programs and economic incentives such as Transfer of Development Rights and conservation easements as well as neighborhood conservation approaches.

- **Policy LU12.3:** Rehabilitation of Historic Resources. Promote adaptive reuse of historic structures and sensitive alterations where changes are proposed. New construction or additions to historic structures shall be respectful of the existing historic resource.

- **Policy LU12.3:** Rehabilitation of Historic Resources. Promote adaptive reuse of historic structures and sensitive alterations where changes are proposed. New construction or additions to historic structures shall be respectful of the existing historic resource.

- **Policy 13.1:** Maintain Character. Reinforce the City's distinctive natural, social, and environmental characteristics including its beachfront and connections to the water, civic and cultural institutions, terrain and climate, and the geographic fabric of neighborhoods and boulevards.

- **Goal LU15:** Enhance Santa Monica's Urban Form. Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.

- **Policy LU15.3:** Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City's rich urban character.

- **Policy LU15.4:** Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.

- **Policy LU15.5:** Pedestrian and Bicycle Connectivity. Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.

- **Policy LU15.8:** Building Articulation. Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.

- **Policy LU15.9:** Pedestrian-Oriented Design. Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.

- **Policy LU15.10:** Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.

- **Policy LU15.11:** Building Façades and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the facade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the public. Guidelines or standards for the building mass above the street wall shall be established in the zoning ordinance.

- **Policy LU15.13:** Gateways. Buildings or features located at gateways to neighborhoods or at special focal point locations, such as major roadway and freeway entries to the City, should recognize the importance of the location with special architectural elements. Where possible, pairs of elements on each side of a gateway should be considered. The elements need not be “mirror images,” but could share architectural characteristics.

- **Policy LU15.14:** Signs. Signs should be considered an integral element of the architectural design of the facade. Signs should be primarily oriented to the pedestrian.

- **Policy LU16.1:** Design Buildings with Consideration of Solar Patterns. In designing new buildings, consider the pattern of the sun and the potential impact of building mass on habitable outdoor spaces and adjacent structures in order to minimize shadows on public spaces at times of the day and year when warmth is desired, and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.

- **Policy LU17.4:** Cooperative Facilities Use. Continue to seek cooperative agreements with schools, institutions and other public agencies to increase open and recreational space accessible to the community.

- **Policy N1.7:** Make new development projects of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes, including ground level open spaces and appropriate building setbacks and upper-floor step backs along neighborhood streets.

- **Policy N4.1:** Design new development to be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.

City of Santa Monica Municipal Code

The City of Santa Monica Municipal Code (SMMC) provides land use regulations and standards for development in the City, including specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, and open space and setback requirements.

Chapter 9.15 Public and Semi-Public Districts

PL Institutional/Public Lands. This Zoning District is for public or semi-public facilities, including municipal offices, schools, libraries, museums, or performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This District is consistent with the LUCE's Institutional/Public Lands land use designation. Table 9.15.030, *Development Standards – Public and Park Districts***,** stipulates the development standards for the Public and Semi-Public Districts.

Standard	PL (Institutional/Public Lands)
Parcel Intensity Standards	
Minimum Parcel Size	20,000 square feet
Building Form and Location	
Maximum Building Stories	2
Maximum Building Height	32 feet
Minimum Setbacks (feet, measured from property line)	
Street Frontage	10 feet
Interior Side and Rear	10 feet; 15 feet when abutting a residential district
Maximum Parcel Coverage (% of Parcel)	N/A

Section 9.21.080, Lighting

Section 9.21.080(A): Applicability

a. **New Lighting.** All new exterior lighting, including lighting fixtures attached to buildings, structures, poles, or self-supporting structures. Exterior lighting may be found on parking lots, walkways, building entrances, outdoor sales areas, landscaping, recreational fields, and building faces.

Section 9.21.080(C): General Standards

b. **Nonresidential Buildings.** All exterior doors, during the hours of darkness, shall be illuminated with a minimum of one foot-light candle of light.

c. **Shielding.** All lighting fixtures shall be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. All luminaries shall meet the most recently adopted criteria of the Illuminating Engineering Society of North America (IESNA) for "Cut Off" or "Full Cut Off" luminaries.

d. **Light Trespass.** Lighting may not illuminate other properties in excess of a measurement of 0.5 foot candles of light.

e. **Maximum Height.** The maximum height for exterior lighting shall be as follows:

    a. Residential, Ocean Park Oceanfront Districts: 16 feet.

    b. Nonresidential Districts: 26 feet.

Section 9.21.080(F): Parking Lot and Structure Lighting

1. Public parking areas designed to accommodate 10 or more vehicles shall be provided with a minimum of 0.5 foot-candle and a maximum of 3.0 foot candles of light over of the parking surface from 0.5-hour before dusk until 0.5-hour after dawn.

2. Lighting design shall be coordinated with the landscape plan to ensure that vegetation growth will not substantially impair the intended illumination.

3. All lighting used to illuminate a parking area for any number of automobiles in any District shall be arranged so that all direct rays from such lighting fall entirely within such parking lot and be consistent with this Section.

Section 9.21.120, Reflective Materials

No more than 25 percent of the surface area of any façade on any new building contain black or mirrored glass or other mirror-like material that is highly reflective, and that materials for roofing be of a non-reflective nature.

3.1.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines, as amended, contain analysis guidelines related to the assessment of aesthetics and visual resources impacts. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold AES-1: ***Have a substantial adverse effect on a scenic vista.***

Threshold AES-2: ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.***

Threshold AES-3: ***In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, does the project conflict with applicable zoning and other regulations governing scenic quality.***

Threshold AES-4: ***Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiates that no impact or a less than significant impact associated with the following thresholds would result from the Proposed Project:

Threshold AES-1: ***Have a substantial adverse effect on a scenic vista.***

Threshold AES-2: ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.***

Threshold AES-4: ***Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

Therefore, these criteria are not further evaluated in this EIR.

3.1.4 PROJECT DESIGN FEATURES

The District will incorporate the following design features during construction of the Proposed Project:

- **PDF AES-1 Temporary Construction Fencing.** Temporary construction fencing would be placed along the periphery of the phase area of construction to screen construction activities from view at the street level.

- **PDF AES-2 Construction-Related Illumination.** Construction lighting would be shielded such that no light source can be seen from adjacent residential properties, the public right-of-way, or from above. However, construction lighting will not be so limited as to compromise the safety of construction workers.

3.1.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

This analysis considers the anticipated change in the physical environment resulting from the Proposed Project against the threshold of significance identified above. Potential impacts, if any, are identified and where impacts would be considered potentially significant, mitigation measures are proposed, if appropriate, to reduce potential impacts to a less than significant level.

Structures and other elements constructed or added to a project may obstruct focal or panoramic views. The City has recognized the value of access to visual resources through planning and zoning regulations that help prevent the obstruction of views of prominent ridgelines, knolls, and other important visual resources, such as Santa Monica State Park or Palisades Park. As such, a project's conformance with placement on a site, building height, and/or density, among other design considerations, has the potential to influence the degree of effect on the existing visual setting.

Additionally, views of a particular site may be experienced differently by visitors unfamiliar with an area, as compared to local residents who are familiar with the existing setting. Therefore, such viewer groups experience different levels of sensitivity to a change in the visual landscape. Residential viewers adjacent to a site would typically have extended viewing periods and are considered to have a higher degree of visual sensitivity; however, private views are not required to be analyzed pursuant to CEQA regulations. Rather, public views (i.e., from area public roadways) are considered in evaluating a change in the visual character or quality of aesthetic resources.

Threshold AES-3: In an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.

Construction

Project construction activities would occur on-site within the Roosevelt Elementary School campus and would not disturb off-site lands. Construction equipment and vehicles (e.g., backhoes, forklifts, skip loaders, and compaction rollers) would be visible on-site during the various phases, although views of the equipment from public off-site locations would vary depending on the phase and where construction is occurring on the campus.

All Proposed Project construction activities would occur in compliance with Santa Monica Municipal Code (SMMC) Section 4.12.110, which regulates construction activities. To ensure that public views into the site are limited during the construction phase, temporary fencing would be installed around active construction areas prior to the commencement of construction. Additionally, as the campus is located within a developed and urbanized area, views into the site from surrounding public vantage points are limited due to intervening fencing, buildings, and established landscaping both on the campus and in the vicinity. Public views of Project-related construction activities at ground level would, therefore, be largely obscured from off-site vantage points. Potential views of construction activities associated with the Proposed Project would also be temporary and short-term and would cease to occur once construction of each phase is completed.

Additionally, construction of the proposed improvements would require removal of 14 existing trees on the school campus. The removal of existing street trees is not proposed or required with implementation of the Proposed Project. Onsite, two Peruvian pepper trees; one Camphor tree; one carob tree; seven Queensland pittosporum; and three citrus trees would be removed. All trees to be removed are ornamental and are part of the existing onsite landscaping. As all such trees are non-native species, they do not represent sensitive biological resources.

As such, construction of the Proposed Project would not conflict with applicable zoning or other regulations governing scenic quality of the school campus. Impacts would be less than significant.

Operation

As previously stated, the Proposed Project is located within a highly urbanized setting in the City of Santa Monica. Therefore, based on the thresholds of significance, analysis of 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. However, visual images were prepared to provide the public with a general understanding of the proposed improvements; such images are not intended to support an analysis of any potential environmental impacts in this regard, pursuant to the requirements of CEQA.

Figure 3.1-2B, **Proposed Front Entrance**, and **Figure 3.1-3B**, **Proposed Aerial View***,* provide architectural renderings from public viewpoints 1 and 2 and illustrate the intended visual character of the Proposed Project. **Figure 3.1-2B** shows the proposed view of the front entrance from Montana Avenue looking northeast into the site following implementation of the Proposed Project. The proposed improvements would be visible to motorists and pedestrians traveling along Montana Avenue and Lincoln Boulevard, in addition to properties located south of Montana Avenue and to the west and east. As shown, the proposed library building would be visible in the foreground, with varied one-story buildings (administration, auditorium) in the background. An improved pedestrian entrance (main entry) into the campus from Montana Avenue would be provided, along with enhancements for the provision of a community lawn and outdoor stage. Tree plantings and landscaping would also be established in the various open spaces.

The new library building would be a visual element of increased bulk and scale; however, it would be viewed in relation to other buildings of greater visible height (i.e., auditorium). Planned two-story buildings (classrooms, teaming space) would be located to the north of the library and auditorium, thereby decreasing their visibility from Montana Avenue (see **Figure 3.1-2B**). The proposed library and other visible structures would generally reflect the height and scale of existing on-site structures and would provide a stepped transition in heights; their views would be further diminished with the provision of the pedestrian elements and lawn component in the foreground. The new structures have been designed to generally reflect the visual appearance of existing on-site buildings in terms of the use of simple materials and building forms with relatively neutral colors. Many of the existing street trees along Montana Avenue would remain and continue to partially screen views from vantage points along this roadway. As such, the Proposed Project is not anticipated to adversely change the overall character of the Proposed Project site from this public vantage point.

Figure 3.1-3B, **Proposed Aerial View**, depicts the proposed view of the site from an aerial perspective looking northeast across the southern portion of the campus from a vantage point above Montana Avenue/Lincoln Boulevard. From this viewing angle, the proposed on-site improvements would be visible to motorists and pedestrians along Lincoln Boulevard and Montana Avenue, in addition to residential properties located west of the campus and residential and commercial uses to the south. As shown, the common lawn area would be dominant in the foreground, with views of the library, administration building, and renovated South Courtyard at a distance within the interior of the site. Structures visible from this vantage point would be one story in height. Although one-story, the auditorium building proposed along Lincoln Boulevard would reach 32 feet in height; however, classroom buildings farther to the north along Lincoln Boulevard (not visible in **Figure 3.1-3B**) would remain in place as a two-story structure (with an addition of a two-story “teaming” building at the northernmost end). Therefore, structures of greater height are currently part of the existing visual setting along Lincoln Boulevard. The proposed courtyard adjacent to the north of the new library would be visible, along with the kindergarten play area. It should be noted that at street level, views looking into the interior of the campus would generally be diminished from this vantage point due to intervening landscaping and/or proposed on-site structures.

New discretionary development within the City is subject to applicable design regulations identified in the City’s Zoning Ordinance and the LUCE, which includes development standards and design policies. Maximum building height proposed for the campus improvements would be 32 feet and would, therefore, not exceed the maximum permitted building height (32 feet above grade) as stipulated in Table 9.15.030, Development Standards - Public and Park Districts, of SMMC Chapter 9.15.

Development of the Proposed Project would comply with Policies LU15.10, N1.7, and N4.1 of the LUCE, which are aimed at designing buildings with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front; ensure that new development projects are of compatible scale and character with existing neighborhoods; provide respectful transitions to existing homes; and transition in size, height, and scale toward adjacent residential structures.

Further, the proposed campus plan has been designed in conformance with adopted setback standards pursuant to SMMC Chapter 9.15, Public and Semi-Public Districts (A). All new buildings sited on the campus would meet applicable minimum setback requirements.

The Proposed Project would incorporate various design features, colors, and exterior building materials that would be compatible with the surrounding setting, which currently supports a range of architectural styles and varying land uses. Incorporation of such design elements would be in conformance with LUCE Goal LU15 and Policies LU15.8 and LU15.10, which encourage architectural design that is compatible with existing neighborhoods; well-designed building façades with articulation in the form of setbacks, offsets, and projections; and use of a mix of architectural materials and elements to establish an aesthetically pleasing pattern.

Additionally, Goal LU12 and Policies LU12.2 and LU12.3 of the LUCE encourage the preservation of buildings and features, which characterize and represent the City's heritage; preservation of historic resources; and adaptive reuse of historic structures; and new construction or additions to historic structures that are respectful of the historic resource. The Proposed Project would demolish four contributing buildings to the historic district (Buildings B, C, G (partial demolition), and K); these buildings are located both centrally and on the periphery of the identified historic district. Following Proposed Project implementation, two contributing buildings (Buildings E and J) that characterize and represent the City's rich heritage (and are considered eligible for listing in the California Register of Historical Resources) would remain intact and would be preserved for the long term (HRG 2024), consistent with City goals and policies.

Other proposed improvements occurring with the Proposed Project include renovation of three existing buildings and outdoor areas on the existing school campus. Any interior alterations to existing on-site buildings would not be visible from the surrounding neighborhood and would not have the potential to result in visual change in the existing visual setting.

General Plan Consistency Analysis

Table 3.1-1, General Plan Relevance/Consistency, is provided below to evaluate Proposed Project consistency with the applicable aesthetic and visual policies from the City's LUCE. Implementation of the Proposed Project would generally be consistent and would comply with the policies in the SMMC and LUCE. Compliance with the identified goals and policies would ensure that implementation of the Proposed Project would not result in significant degradation of the visual quality of the campus or surrounding area. As such, the Proposed Project would result in a less than significant impact with respect to visual character and quality.

TABLE 3.1-1
GENERAL PLAN RELEVANCE/CONSISTENCY

General Plan Policy	Relevance/Consistency
Land Use and Circulation Element	
Policy LU1.4: Retention of Existing Structures. Encourage and incentivize preservation of historic structures and older buildings that add to the character of residential districts through the development of programs such as Transfer of Development Rights (TDR) and conservation easements.	The Proposed Project has been designed to balance preservation of the school's historical character with achieving conformance with the Districtwide Educational Specifications. Components of the identified onsite historic district would be retained and renovated with the Proposed Project, while respecting the original character of the campus setting and surrounding, largely residential, neighborhood. The school would remain under the jurisdiction of the District and the use of Transfer of Development Rights or conservation easements for the protection of any historic resources is not proposed.
Policy LU1.5: Design Compatibility. Require that new infill development be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height, and scale toward adjacent residential structures.	The Proposed Project would result in improvements on the existing elementary school campus and does not represent new "infill" development on previously undeveloped land. The buildings and outdoor areas have been designed to be compatible with the existing scale, mass, and character of the surrounding neighborhood, which is generally residential in nature. New buildings would not exceed two stories in height, consistent with surrounding residential uses. Further, school activities would be accommodated within a number of individual structures onsite, rather than in one large building, thereby reducing visual bulk and scale of the facilities.
Policy LU4.5: Art and Amenities. Foster creativity and the arts through programming uses and site improvements such as the provision of community spaces, public art, and creative design of public improvements.	The school campus has been designed to provide both classroom space and other elements aimed at enhancing educational opportunities, collaboration, and creativity amongst students and faculty, while meeting Districtwide Educational Specifications. The campus would include a new makerspace building and outdoor maker yard. The maker studios are intended to accommodate flexible uses for science laboratory, art studio, and other creative and collaborative project work. The larger spaces would support team teaching, group projects, and after-school programs that cannot be accommodated in a traditional classroom space; the second floor of the makerspace building would include teaming rooms.
Goal LU12: Encourage Historic Preservation Citywide. Preserve buildings and features which characterize and represent the City's rich heritage.	The Proposed Project has been designed to the balance the preservation of the school's historical character with the District's needs for larger classrooms, new extracurricular facilities, and adequate support infrastructure and requirements to meet the Districtwide Educational Specifications. The campus as redesigned would result in preservation of Buildings E and J, along with the South Courtyard. Retention and rehabilitation of these buildings and the South Courtyard would preserve characteristics of the original campus design directly associated with Marsh, Smith, & Powell and the PWA Moderne style of architecture, allowing these components to continue to express key tenets of the "Santa Monica Plan" design as originally envisioned by the architects and reflecting the City's rich architectural heritage. Refer also to Section 3.3, Cultural Resources, for further discussion.

TABLE 3.1-1, CONTINUED

General Plan Policy	Relevance/Consistency
Policy LU12.1: Integration. Integrate the preservation of historic buildings into land use and planning practices.	Refer to Goal LU12.
Policy LU12.2: Preservation Programs. Preserve and protect historic resources through the development of preservation programs and economic incentives such as Transfer of Development Rights and conservation easements as well as neighborhood conservation approaches.	Refer to Policy LU1.4.
Policy LU12.3: Rehabilitation of Historic Resources. Promote adaptive reuse of historic structures and sensitive alterations where changes are proposed. New construction or additions to historic structures shall be respectful of the existing historic resource.	As indicated, the Proposed Project as designed would preserve the historic quality and character of the school by maintaining the original South Courtyard area in the center of the campus, along with the core buildings and the same spatial relationships between these structures. In addition to new construction, the Proposed Project would result in renovation of four existing buildings and outdoor areas on the existing school campus, thereby allowing such elements to remain and contribute to the resulting character.
Policy LU13.1: Maintain Character. Reinforce the City's distinctive natural, social, and environmental characteristics including its beachfront and connections to the water, civic and cultural institutions, terrain and climate, and the geographic fabric of neighborhoods and boulevards.	The Proposed Project would result in the redesign of existing the Roosevelt Elementary School campus to meet Districtwide Educational Specifications and allow for larger classrooms, new extracurricular facilities, and adequate support infrastructure. Such improvements are planned to respect the overall architectural characteristics of the existing school, while respecting the established setting of the campus within the context of the surrounding neighborhood.
Goal LU15: Enhance Santa Monica's Urban Form. Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.	The Proposed Project would result in enhancements to the elementary school campus and would not change the existing land use or operational characteristics. Refer to Policy LU1.5 and LU13.1, above. The Proposed Project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Alta Avenue, 9th Street, Montana Avenue, and Lincoln Boulevard. Additionally, the Proposed Project would include pedestrian access points to the campus along Montana Avenue (via main entry), Lincoln Boulevard (via community lawn and outdoor stage area), and 9th Street (via loading area and pickup/drop-off entry). No off-site improvements are proposed that would interfere with pedestrian movement.
Policy LU15.3: Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City's rich urban character.	Refer to Policy LU1.5 and LU13.1, above.

TABLE 3.1-1, CONTINUED

General Plan Policy	Relevance/Consistency
Policy LU15.4: Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.	Refer also to Policy LU1.4 and Goal LU15, above. Additionally, when originally constructed in 1935, unobstructed views of Buildings E and J on the school campus were afforded from Lincoln Boulevard and Montana Avenue. Subsequent construction of other on-site buildings along the Lincoln Boulevard frontage and in the foreground along Montana Avenue between Buildings E and J and the campus boundary have since concealed them from public view. The Proposed Project would remove the later buildings and redesign the campus so that Buildings E and J would again be visible and accessible from the original entrance to the campus, thereby enhancing visual permeability of the site. Additionally, the Proposed Project would redesign the primary school entrance along Montana Avenue and the front community lawn at the intersection of Montana Avenue and Lincoln Boulevard to enhance the integration of the school with the community. As show on Figure 3.1-2B, the entryway would be widened and recontoured with the new buildings along Montana to provide visual permeability into the campus. The front community lawn would be redesigned and revegetated to provide a greater inviting connection with the community.
Policy LU15.5: Pedestrian and Bicycle Connectivity. Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.	Refer to Goal LU15. The Proposed Project would not modify the surrounding circulation network, including roadways and pedestrian facilities. The Proposed Project does not include improvements that would inhibit students or parents from walking to and from the school, or that would create unsafe conditions that would discourage pedestrian activity. It is anticipated that students living within a reasonable walking distance of the school would continue to access the campus on foot, similar to that which occurs under existing conditions. Onsite parking would be provided via a surface lot in the northern portion of the campus or an underground parking garage; such improvements are not anticipated to create adverse separation or circulation issues.
Policy LU15.8: Building Articulation. Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.	Refer also to Policy LU1.5. The proposed buildings have been designed with respect for the existing character of the campus and incorporate the use of varied setbacks, offsets, projections, and a mix of architectural materials and elements. The use of large areas of glass, highly reflective materials, or dark or reflective glass is not proposed.
Policy LU15.9: Pedestrian-Oriented Design. Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.	Refer to Policy LU15.8. The Proposed Project would result in renovation of several existing buildings and new construction designed to respect the existing architectural character of the campus. Buildings would not exceed two stories in height, thereby reinforcing a pedestrian scale; building articulation would reflect the existing visual character of the campus and would create varying levels of interest, both at street level and upper portions of the buildings.

TABLE 3.1-1, CONTINUED

General Plan Policy	Relevance/Consistency
Policy LU15.10: Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.	Refer to Policy LU15.9 above. See also Figures 3.1-2A and 3.1-2B.
Policy LU15.11: Building Façades and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the facade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the public. Guidelines or standards for the building mass above the street wall shall be established in the zoning ordinance.	Refer to Policy LU15.9 above. See also Figures 3.1-2A and 3.1-2B. The buildings and outdoor areas have been designed to be compatible with the existing scale, mass, and character of the surrounding neighborhood, which is generally residential in nature. New buildings would not exceed two stories in height, consistent with surrounding residential uses. Further, school activities would be accommodated within a number of individual structures onsite, rather than in one large building, thereby reducing visual bulk and scale of the facilities.
Policy LU15.13: Gateways. Buildings or features located at gateways to neighborhoods or at special focal point locations, such as major roadway and freeway entries to the City, should recognize the importance of the location with special architectural elements. Where possible, pairs of elements on each side of a gateway should be considered. The elements need not be "mirror images," but could share architectural characteristics.	The Roosevelt Elementary School campus is generally located in an urbanized residential area in the City of Santa Monica, with land uses trending to commercial retail, office, and mixed-use development to the southwest/southeast. The campus is not located at a gateway or special focal point location, or entryway into the City.
Policy LU15.14: Signs. Signs should be considered an integral element of the architectural design of the facade. Signs should be primarily oriented to the pedestrian.	The Proposed Project does not include new signage as part of the school's façade. However, a new monument sign would be installed along Montana Avenue and would be reflective of the overall architectural character of the school relative to color and materials.
Policy LU16.1: Design Buildings with Consideration of Solar Patterns. In designing new buildings, consider the pattern of the sun and the potential impact of building mass on habitable outdoor spaces and adjacent structures in order to minimize shadows on public spaces at times of the day and year when warmth is desired, and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.	The campus has been designed with consideration for potential shading effects on outdoor spaces and adjacent structures to minimize shadow effects. Walkways and building overhangs are also incorporated into the campus and building design to provide additional shade and relief to students and staff as needed. Proposed onsite structures would not exceed two stories in height and would not result in adverse shading effects on any adjacent offsite properties.
Policy LU17.4: Cooperative Facilities Use. Continue to seek cooperative agreements with schools, institutions, and other public agencies to increase open and recreational space accessible to the community.	As occurs under existing conditions, recreational facilities at the school would be 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.

TABLE 3.1-1, CONTINUED

General Plan Policy	Relevance/Consistency
Policy N1.7: Make new development projects of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes, including ground level open spaces and appropriate building setbacks and upper-floor step backs along neighborhood streets.	Refer to Policy LU1.5 and Policy LU15.11.
Policy N4.1: Design new development to be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height, and scale toward adjacent residential structures.	Refer to Policy LU1.5 and Policy LU15.11.

Summary

As such, the Proposed Project would generally be consistent with applicable regulations identified in the SMMC and LUCE. Such compliance would ensure that implementation of the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts in this regard would be less than significant.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant without mitigation.

3.1.6 CUMULATIVE IMPACT ANALYSIS

The geographic context for the cumulative analysis of aesthetic impacts is limited to areas within view of the Proposed Project. Only those related projects (1) that would be sufficiently close to influence the visual character of the immediate Proposed Project area, (2) that fall within the same viewshed as the Proposed Project and may contribute to obstruction of the same valued visual resources from the Proposed Project area, or (3) that could affect the same off-site sensitive uses as the Proposed Project could pose cumulative impacts in conjunction with the Proposed Project.

Refer to **Figure 3-1**, **Cumulative Projects,** and listed in **Table 3-1**, **Cumulative Projects List.** Due to intervening structures and landscaping, other related projects are not likely to share the same viewshed as the Proposed Project or contribute to visual effects relative to the same visual resources in the Proposed Project area. In addition, the new buildings proposed on the campus would have a more cohesive site layout and modern design. Consistent with City height limitation, the proposed heights of the new buildings would not contribute to a new obstruction of existing, recognized view resources, such as the Santa Monica Mountains and the Pacific Ocean. Views of these resources from areas surrounding the Proposed Project site are restricted and are primarily only available from public rights-of-way and not across the Project site. Therefore, the Proposed Project would not contribute to the obstruction of any valued views that may result from any of the nearby related projects. As such, cumulative impacts related to views would be less than significant.

The Proposed Project would replace the majority of older buildings with more modern structures that would be compatible in design with newer residential or commercial uses in the surrounding neighborhoods or other portions of the City, where new developments are under way. Future development, including the related projects, would be subject to the City's design review processes and discretionary review to ensure consistency with adopted guidelines and standards, as well as the City's General Plan and Zoning Ordinance, to minimize the potential to adversely affect the existing visual character or quality of the City. Therefore, the Proposed Project, along with the related projects in the immediate vicinity of the Project site, would not contribute to a significant effect due to the degradation of the visual character or quality of the Proposed Project area because of non-conformance with adopted zoning or other regulations governing scenic quality. As such, cumulative impacts would be less than significant and would therefore not be cumulatively considerable.

Mitigation Measures

No mitigation measures are required.

Level of Significance

Less than significant.

This page intentionally left blank.

3.2 AIR QUALITY

This section of the EIR evaluates potential air quality impacts that may result from construction and operation of the Roosevelt Elementary School Campus Plan (Proposed Project). The following discussion addresses the existing air quality conditions of the affected environment, evaluates the Project's consistency with applicable goals and policies, analyzes environmental impacts, and identifies measures to reduce or avoid adverse impacts anticipated from implementation of the Project, as applicable. This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (South Coast AQMD). The analysis focuses on air pollution from regional emissions and localized pollutant concentrations. Criteria air pollutant emissions modeling is included in **Appendix C**, **Air Quality, Energy, and Greenhouse Gases Modeling Results**, of this EIR.

During the IS/NOP public review period, comments were received regarding air quality during construction due to unpleasant smells and particulate matter of the Proposed Project. The IS/NOP and all scoping comment letters are included as **Appendix A** of this document.

3.2.1 ENVIRONMENTAL SETTING

Topography and Climate

The Project site is located in the South Coast Air Basin (SCAB). The SCAB includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, as well as all of Orange County. The SCAB is generally located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant, with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. The topography and climate of Southern California combine to make the SCAB an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer which inhibits pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers the photochemical reactions that produce ozone and the majority of particulate matter.

Temperature and Precipitation

The annual average temperature varies little throughout the SCAB, ranging from the low to middle 60s, measured in degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station nearest to the Proposed Project's site with temperature data is the Santa Monica Pier Monitoring Station (ID 047953). The average low is reported at 49.2 °F in January, and the average high is 72.1°F in August (WRCC 2023).

In contrast to a steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from October through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. Rainfall averages 12.62 inches per year in the vicinity of the area (WRCC 2023).

Humidity

Although the SCAB has a semiarid climate, the air near the earth's surface is typically moist because of a shallow marine layer. This "ocean effect" is dominant except for infrequent periods when dry, continental air is brought into the SCAB by offshore winds. Periods of heavy fog are frequent, given the SCAB's location along the coast. Low clouds, often referred to as high fog, are a characteristic climatic feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB (South Coast AQMD 1993).

Wind

Wind patterns across the southern coastal region are characterized by westerly or southwesterly onshore winds during the day and easterly or northeasterly breezes at night. Wind speed is somewhat greater during the dry summer months than during the rainy winter season. Between periods of wind, periods of air stagnation may occur in the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall months, surface high-pressure systems over the SCAB combined with other meteorological conditions can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished. The mountain ranges to the east inhibit the eastward transport and diffusion of pollutants. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentrations of air pollutants during prolonged periods of stable atmospheric conditions (South Coast AQMD 2005).

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions are critical determinants in leading to the highly degraded air quality in summer and the generally good air quality in the winter in the SCAB (South Coast AQMD 2005).

Air Pollutants of Concern

Air pollutants emitted into the ambient air by stationary and mobile sources are subject to the rules and regulations imposed by South Coast Air Quality Management District (SCAQMD), the California ambient air quality standards (CAAQS) adopted by California Air Resources Board (CARB), and the national ambient air quality standards (NAAQS) adopted by the US Environmental Protection Agency (USEPA). These regulated air pollutants are known as criteria air pollutants and are categorized into primary and secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxide (NO_X), sulfur dioxide (SO_2), coarse particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$), lead, and fugitive dust are primary air pollutants. Of these, CO, SO_2, PM_{10}, and $PM_{2.5}$ are criteria pollutants. ROG and NO_X are criteria pollutant precursors and go on to form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and nitrogen dioxide (NO_2) are the principal secondary pollutants. **Table 3.2-1**, **Criteria Air Pollutants Summary of Common Sources and Effects**, describes these primary and secondary criteria air pollutants and their known health effects.

TABLE 3.2-1
CRITERIA AIR POLLUTANTS SUMMARY OF COMMON SOURCES AND EFFECTS

Pollutant	Major Man-Made Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrous oxides (NOx) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield.
Particulate Matter (PM_{10} & $PM_{2.5}$)	Produced by power plants, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles and others.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility.
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Ambient Air Quality

The SCAQMD operates a network of ambient air monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of air pollutants and determine whether the ambient air quality meets the NAAQS and the CAAQS. **Table 3.2-2, Summary of Ambient Air Quality Data**, summarizes the published data for each year between 2020 and 2022 for ozone, PM_{10}, $PM_{2.5}$, CO, and NO_2 from the VA Hospital, Westchester Parkway, and North Main Street air quality monitoring stations in Los Angeles.

TABLE 3.2-2
SUMMARY OF AMBIENT AIR QUALITY DATA

Pollutant Standards	2020	2021	2022
Ozone			
Max 1-hour concentration (ppm)[a]	0.134	0.095	0.081
Max 8-hour concentration (ppm) (state/federal)[a]	0.093 / 0.092	0.083 / 0.082	0.070 / 0.070
Number of days above state 1-hour standard[a]	6	1	0
Number of days above state/federal 8-hour standard[a]	8 / 8	1 / 1	0 / 0
Respirable Particulate Matter (PM_{10})			
Max 24-hour concentration (μg/m^3) (state/federal)[b]	55.5 / 55.6	33.2 / 33.3	* / *
Number of days above state/federal standard[b]	1 / 0	0 / 0	0 / 0
Fine Particulate Matter ($PM_{2.5}$)			
Max 24-hour concentration (μg/m^3) (state/federal)[c]	175.0 / 175.0	61.1 / 61.0	38.0 / 33.7
Number of days above federal standard[c]	12	13	0
Carbon Monoxide (CO)			
Max 1-hour concentration (ppm)[c]	1.895	1.692	1.672
Number of days above state standard[c]	0	0	0
Nitrogen Dioxide (NO_2)			
Max 1-hour concentration (ppm) (state/federal)[a]	76 / 76.6	60 / 60.6	51 / 51.4
Number of days above state/federal 1-hour standard[a]	50 / *	50 / 43	50 / 43

Source: CARB 2023a, 2023b
ppm = parts per million; μg/m^3 = micrograms per cubic meter; * = No data is currently available from CARB to determine the value.
Notes:
a. Measurements taken at Los Angeles - VA Hospital located at Wilshire Blvd. and Sawtelle, Los Angeles, CA 90025.
b. Measurements taken at Los Angeles – Westchester Parkway located at 7201 W. Westchester Parkway, Los Angeles, CA 90045.
c. Measurements taken at Los Angeles – North Main Street located at 1630 North Main Street, Los Angeles, CA 90012.

The attainment status for the SCAB is shown in **Table 3.2-3**, **Federal and State Ambient Air Quality Standards and Attainment Status for SCAB**. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. Areas for which there is insufficient data available are designated as unclassified. The region is designated as a nonattainment area for the federal ozone, $PM_{2.5}$, and lead standards and is also a nonattainment area for the state standards for ozone, PM_{10}, and $PM_{2.5}$ standards.

TABLE 3.2-3
FEDERAL AND STATE AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS

Pollutant	Averaging Time	California[a]		Federal[b]	
		Standard[c]	Attainment Status	Standard[c,d]	Attainment Status
Ozone (O_3)	1 Hour	0.09 ppm (180 μg/m³)	**Nonattainment**	N/A	N/A[e, j]
	8 Hours	0.070 ppm (137 μg/m³)	**Nonattainment**	0.070 ppm (137 μg/m³)	**Nonattainment**
Particulate Matter (PM_{10})	24 Hours	50 μg/m³	**Nonattainment**	150 μg/m³	Attainment/ Maintenance[k]
	Annual Arithmetic Mean	20 μg/m³	**Nonattainment**	N/A	N/A
Fine Particulate Matter ($PM_{2.5}$)	24 Hours	No Separate State Standard		35 μg/m³	Nonattainment
	Annual Arithmetic Mean	12 μg/m³	**Nonattainment**	12.0 μg/m³	**Nonattainment**
Carbon Monoxide (CO)	8 Hours	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Attainment/ Maintenance
	1 Hour	20 ppm (23 mg/m³)	Attainment	35 ppm (40 mg/m³)	Attainment/ Maintenance
Nitrogen Dioxide (NO_2)[e]	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)	N/A	53 ppb (100 μg/m³)	Attainment/ Maintenance
	1 Hour	0.18 ppm (339 μg/m³)	Attainment	100 ppb (188 μg/m³)	Attainment/ Maintenance
Lead (Pb)[g,h]	30 days Average	1.5 μg/m³	Attainment	N/A	N/A
	Calendar Quarter	N/A	N/A	1.5 μg/m³	Nonattainment[l]
	Rolling 3-Month Average	N/A	N/A	0.15 μg/m³	Nonattainment[l]
Sulfur Dioxide (SO_2)[f]	24 Hours	0.04 ppm (105 μg/m³)	Attainment	0.14 ppm (for certain areas)	Unclassified/ Attainment
	3 Hours	N/A	N/A	N/A	N/A
	1 Hour	0.25 ppm (655 μg/m³)	Attainment	75 ppb (196 μg/m³)	N/A
	Annual Arithmetic Mean	N/A	N/A	0.30 ppm (for certain areas)	Unclassified/ Attainment
Visibility-Reducing Particles[i]	8 Hours (10 a.m. to 6 p.m., PST)	Extinction coefficient = 0.23 km @<70% RH	Unclassified	**No Federal Standards**	
Sulfates	24 Hour	25 μg/m³	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m³)	Unclassified		

TABLE 3.2-3, CONTINUED

Pollutant	Averaging Time	California[a]		Federal[b]	
		Standard[c]	Attainment Status	Standard[c,d]	Attainment Status
Vinyl Chloride[g]	24 Hour	0.01 ppm (26 μg/m^3)	N/A		

Sources:
CARB 2022, South Coast AQMD 2022.
Notes: μg/m^3 = micrograms per cubic meter; ppm = parts per million; ppb = parts per billion; km = kilometer(s); RH = relative humidity; PST = Pacific Standard Time; N/A = Not Applicable

a. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
b. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
c. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
d. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.
e. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
f. On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of ppb. California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
g. CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
h. The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 μg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
i. In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.
j. The 1979 1-hour ozone NAAQS (0.12 ppm) was revoked, effective June 2005; however, the Basin has not attained this standard and therefore has some continuing obligations with respect to the revoked standard.
k. The USEPA eliminated the annual PM10 standard in its final rule revision in October 2006. The USEPA redesignated the basin as attainment/maintenance on July 26, 2013.
l. Partial Nonattainment designation – Los Angeles County portion of the Basin only for near-source monitors. These sites are expected to remain in attainment based on current monitoring data; pandemic-related shutdowns led to an inability to satisfy USEPA data completeness requirements.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs include: industrial processes, such as petroleum refining; commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects associated with TACs are quite diverse and generally are assessed locally rather than regionally.

To date, CARB has designated over 200 compounds as TACs. Additionally, CARB has implemented control measures for several compounds that pose high risks and show potential for effective control. Most of the estimated health risks from TACs can be attributed to a relatively few compounds.

CARB has identified diesel PM as a TAC. Diesel PM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particles and gases produced when an engine burns diesel fuel. Diesel PM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. Diesel PM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of diesel PM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation. Diesel exhaust can also cause coughing, headaches, light-headedness, and nausea. Diesel PM poses the greatest health risk among the TACs. Due to their extremely small size, these particles can be inhaled and eventually become trapped in the lungs' bronchial and alveolar regions.

There are available measures that can be employed to reduce the risk impacts of diesel PM from heavy trucks. In 1984, because of public concern for exposure to airborne carcinogens, CARB adopted regulations to reduce the amount of air toxic contaminant emissions resulting from mobile sources, such as trucks. According to CARB, between 1990 and 2012, ambient concentration and emission trends for diesel PM declined significantly. The decline in ambient concentration and emission trends of diesel PM is a result of various regulations that CARB has implemented to address cancer risk. For instance, in 2000, CARB's Diesel Risk Reduction Plan recommended the replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (less than 15 parts per million [ppm]) diesel fuel. As a result of these measures, diesel PM concentrations declined 68 percent, even though the state's population increased 31 percent and the amount of diesel vehicles miles traveled increased 81 percent. Although progress has been made over the past decade in reducing exposure to diesel exhaust, diesel exhaust still poses substantial risks to public health and environment. Efforts to reduce diesel PM exposure through use of cleaner-burning diesel fuel, retrofitting engines with particle-trapping filters, introduction of new, advanced technologies that reduce particle emissions, and use of alternative fuels are approaches that are being explored and implemented. CARB anticipates that newly adopted diesel exhaust control measures will reduce population exposure even further, and that as the sustainable freight program expands, population exposure to diesel exhaust population will decrease even further. It is estimated that emissions of diesel PM in 2035 will be less than half those in 2010, further reducing statewide cancer risk and non-cancer health effects.

Sensitive Receptors

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.

As the Proposed Project site is an elementary school, the existing (and proposed) land use represents a sensitive receptor (i.e., students attending the school); however, as CEQA typically considers the potential effects of a project on offsite land uses, the nearest sensitive receptors considered for purposes of analysis herein are the single- and multifamily residences approximately 50 feet or more to the north, west, and south of the school campus. The multifamily residences to the west are the closest to the Project site.

3.2.2 REGULATORY SETTING

Federal

Clean Air Act

The Clean Air Act of 1970 and its Amendments of 1971 required the USEPA to establish the NAAQS, with states retaining the option to adopt more stringent standards or to include other specific pollutants. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those members of the population most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The USEPA has classified air basins (or portions thereof) as being in attainment, nonattainment, or unclassified for each criteria air pollutant, based on whether or not the NAAQS have been achieved. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation. **Table 3.2-3** lists the federal attainment status of the SCAB for the criteria pollutants.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 188 substances are listed as hazardous air pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants program. The USEPA is establishing regulatory schemes for specific source categories and requires implementation of maximum achievable control technologies for major sources of HAPs in each source category. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and is aimed at HAPs that are a problem in California. The state has formally identified more than 200 substances as TACs and is adopting appropriate control measures for each. Once these control measures are adopted at the state level, each air district will be required to adopt measures that are equally or more stringent.

State

California Air Toxics "Hot Spots" Information and Assessment Act

The California Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill [AB] 2588) is a statewide program enacted in 1987. AB 2588 requires facilities that exceed levels recommended by the Office of Environmental Health Hazard Assessment to reduce risks to acceptable levels. AB 2588 requires facilities to quantify the emissions of TACs, and in some cases, conduct a health risk assessment and notify the public, while developing risk reduction strategies.

Typically, land development projects generate diesel emissions from construction vehicles during the construction phase, as well as some diesel emissions from small trucks during the operational phase. Diesel exhaust is mainly composed of PM and gases, which contain potential cancer-causing substances. Emissions from diesel engines currently include over 40 substances that are listed by the USEPA as HAPs and by CARB as TACs. On August 27, 1998, CARB identified PM in diesel exhaust as a TAC, based on data linking diesel particulate emissions to increased risks of lung cancer and respiratory disease.

In September 2000, CARB adopted a comprehensive diesel risk reduction plan to reduce emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan is to reduce diesel PM emissions and the associated health risk by 75 percent by 2010 and by 85 percent by 2020. As part of this plan, CARB identified Airborne Toxic Control Measures (ATCM) for mobile and stationary emissions sources. Each ATCM is codified in the California Code of Regulations (CCR), including the ATCM to limit diesel-fueled commercial motor vehicle idling, which places limits on idling time for large diesel engines (13 CCR Chapter 10 Section 2485).

13 CCR Chapter 10 Section 2480, Airborne Toxic Control Measure to Limit School Bus Idling

The purpose of this control measure is to reduce public exposure, especially school age children's exposure, to diesel PM and other toxic air contaminants by limiting unnecessary idling of specific vehicular sources. It applies to the operation of every school bus, transit bus, school pupil activity bus youth bus, general public paratransit vehicle, and other commercial motor vehicle unless exempt.

13 CCR Chapter 10 Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The purpose of this control measure to reduce public exposure to diesel particulate matter and other air contaminants by establishing idling restrictions, emission standards, and other requirements for heavy-duty diesel engines and alternative idle reduction technologies to limit the idling of diesel-fueled commercial motor vehicle. It applies to any person, business, or government agency that owns, operates, or causes to operate the certain equipment at any location in California. The certain equipment are California-based and non-California-based diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicle weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways, and alternative idle reduction technologies including but not limited to internal combustion engine auxiliary power systems (APS), fuel-fired heaters, battery-electric APSs, and other technologies installed on diesel-fueled commercial motor vehicles.

24 CCR, Part 6, Building and Energy Efficiency Standards

In 1978, the California Energy Commission (CEC) established the Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as Title 24, California's energy efficiency standards for residential and non-residential buildings, in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. The 2022 Title 24 became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

24 CCR, Part 11, Green Building Standards

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the State's landmark initiative Assembly Bill (AB) 32 goals, which established a comprehensive program of cost-effective reductions of GHG emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.

California Clean Air Act

The federal Clean Air Act allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. CARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and state air pollution control programs in California, including setting the CAAQS. CARB also conducts research, compiles emission inventories, develops suggested control measures, and oversees local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It sets fuel specifications to further reduce vehicular emissions. CARB also has primary responsibility for the development of California's State Implementation Plan (SIP; see below), for which it works closely with the federal government and the local air districts.

In addition to standards set for the six criteria pollutants, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Further, in addition to primary and secondary ambient air quality standards, the state has established a set of episode criteria for O_3, CO, NO_2, SO_2, and PM. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that actually threaten public health. **Table 3.2-3** lists the state air quality standards and attainment status of the SCAB for the criteria pollutants.

California State Implementation Plan

The federal Clean Air Act (and its subsequent Amendments) requires each state to prepare an air quality control plan referred to as the SIP. The SIP is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The Amendments dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the Clean Air Act. The USEPA has the responsibility to review all SIPs to determine if they conform to the requirements of the act.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register.

Regional

2022 Air Quality Management Plan

The 2022 Air Quality Management Plan (2022 AQMP), prepared by the SCAQMD, is the SIP for the SCAB. The 2022 AQMP is a regional blueprint for achieving air quality standards and healthful air in the SCAB and those portions of the Salton Sea Air Basin that are under the SCAQMD's jurisdiction. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 8-hour ozone standard. The AQMP relies on a partnership of governmental agencies at the federal, state, regional, and local levels. The USEPA, CARB, local governments, Southern California Association of Governments (SCAG) and the SCAQMD are the primary agencies that implement the AQMP programs. The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's latest *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts.

South Coast Air Quality Management District Rules and Regulations

The following is a list of noteworthy SCAQMD rules that are required of construction activities associated with the Project:

- Rule 401 (Visible Emissions) – This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the US Bureau of Mines.

- Rule 402 (Nuisance) – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- Rule 403 (Fugitive Dust) – This rule requires fugitive dust sources to implement best available control measures for all sources and prohibits all forms of visible PM from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

  a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

  b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

  c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

  d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

  e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- Rule 1113 (Architectural Coatings) – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

- Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) – The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

3.2.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines as amended contains analysis guidelines related to the assessment of air quality impacts. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold AQ-1: ***Conflict with or obstruct implementation of the applicable air quality plan.***

Threshold AQ-2: ***Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.***

Threshold AQ-3: Expose sensitive receptors to substantial pollutant concentrations.

Threshold AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiates that impacts associated with the following thresholds would be less than significant:

Threshold AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

According to the SCAQMD *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. The proposed project does not include any uses identified by the SCAQMD as being associated with odors.

Certain odors may emanate from construction operations if diesel-powered construction equipment during the construction period for the Proposed Project. These odors would be limited to the construction period and would disperse quickly; therefore, these odors would not be considered a significant impact. 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 project 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 it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors from heavy-duty equipment exhaust. The Proposed Project would also comply with the SCAQMD Regulation XI, *Rule 1113 – Architectural Coating*, which would minimize odor impacts from ROG emissions during architectural coating. Any impacts to existing adjacent land uses would be short-term and are less than significant.

SCAQMD Thresholds

The significance criteria established by the applicable air quality management or air pollution control district (in this case, SCAQMD) may be relied upon to make the above determinations. According to the SCAQMD, an air quality impact is considered significant if the Proposed Project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality for construction and operational activities of land use development projects such as that proposed, as shown in **Table 3.2-4**, **SCAQMD Regional Significance Thresholds – Pounds per Day**.

TABLE 3.2-4
SCAQMD REGIONAL SIGNIFICANCE THRESHOLDS – POUNDS PER DAY

Air Pollutant	Construction Activities	Operations
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55

Source: SCAQMD 2023

CO Hot Spot Analysis

In addition to the daily thresholds listed above, development associated with the Proposed Project would be subject to the ambient air quality standards. These are addressed though an analysis of localized CO impacts. The significance of localized impacts depends on whether ambient CO levels in the vicinity of the Project site are above state and federal CO standards; refer to **Table 3.2-3**. The SCAB has been designated as attainment under the 1-hour and 8-hour standards.

Localized Significance Thresholds

In addition to the CO hot spot analysis, the SCAQMD developed localized significance thresholds (LSTs) for emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ generated at new development sites (off-site mobile source emissions are not included in the LST analysis). LSTs represent the maximum emissions that can be generated at a project site without expecting to cause or substantially contribute to an exceedance of the most stringent national or state ambient air quality standards. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that, when added to the local background concentrations, violate the AAQS. LSTs are based on the ambient concentrations of that pollutant within the project source receptor area (SRA), as demarcated by the SCAQMD, and the distance to the nearest sensitive receptor. The nearest sensitive receptors are the multifamily residences approximately 50 feet to the west. LST analysis for construction is applicable for all projects that disturb 5 acres or less on a single day. Santa Monica is located within SCAQMD SRA 2. **Table 3.2-5**, **Local Significance Thresholds (Construction/Operation)**, shows the LSTs for SRA 2 with sensitive receptors located within 25 meters of the Project site.

TABLE 3.2-5
SCAQMD LOCAL SIGNIFICANCE THRESHOLDS (CONSTRUCTION/OPERATION)

Project Size	Nitrogen Oxide (NOx) (pounds per day)	Carbon Monoxide (CO) (pounds per day)	Coarse Particulate Matter (PM_{10}) (pounds per day)	Fine Particulate Matter ($PM_{2.5}$) (pounds per day)
1 Acre	103 / 103	562 / 562	4 / 1	3 / 1
2 Acres	147 / 147	827 / 827	6 / 2	4 / 1
5 Acres	221 / 221	1,531 / 1,531	13 / 3	6 / 2

Source: SCAQMD 2009

Toxic Air Contaminant Thresholds

The SCAQMD regulates levels of air toxics through a permitting process that covers both construction and operation. The SCAQMD has adopted Rule 1401 for both new and modified sources that use materials classified as air toxics. The SCAQMD CEQA Guidelines for permit processing consider the following types of projects significant:

- Any project involving the emission of a carcinogen or TAC identified in SCAQMD Rule 1401 that exceeds the maximum individual cancer risk of 10 in one million if the project is constructed with best available control strategy for toxics (T-BACT) using the procedures in SCAQMD Rule 1401.
- Any project that could accidentally release an acutely hazardous material or routinely release a TAC posing an acute health hazard.
- Any project that could emit an air contaminant not currently regulated by a SCAQMD rule, but that is on the federal or state air toxics list.

3.2.4 PROJECT DESIGN FEATURES

There are no Project design features for air quality.

3.2.5 IMPACT ANALYSIS AND MITIGATION DISCUSSION

Methodology for Analysis

Air quality impacts were assessed in accordance with methodologies recommended by CARB and the SCAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod), version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. CalEEMod compiles an emissions inventory of construction (fugitive dust, off-road exhaust emissions, and on-road emissions), area sources, indirect emissions from energy use, mobile sources, indirect emissions from waste disposal, and indirect emissions from water/wastewater treatment. Criteria air pollutant emissions modeling is included in **Appendix C** of this EIR. The calculated emissions of the Proposed Project are compared to thresholds of significance for individual projects as shown in **Table 3.2-4**, based on the SCAQMD Handbook.

This analysis evaluates anticipated changes in the physical environment resulting from the Proposed Project against the thresholds of significance identified below, to determine if direct and indirect changes from existing conditions would constitute potentially significant impacts. Project changes are described and potential impacts, if any, are identified under each impact discussion. In the event that impacts are found to be potentially significant, mitigation measures would be identified to reduce impacts to a less than significant level.

Threshold AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.

The Project is located within the SCAB, which is governed by the SCAQMD. In order to reduce emissions, the SCAQMD adopted the 2022 AQMP, which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and federal air quality standards. The AQMP is a regional and multiagency effort including the SCAQMD, CARB, SCAG, and USEPA.

The 2022 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the 2020-2045 RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The SCAQMD considers projects that are consistent with the AQMP, which is intended to bring the SCAB into attainment for all criteria pollutants, to also have less than significant cumulative impacts. A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. It fulfills the CEQA goal of informing decision makers of the environmental effects of the Proposed Project under consideration early enough to ensure that air quality concerns are fully addressed.

Criteria for determining consistency with the AQMP are defined by the following indicators:

Criterion 1:

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

a) *Would the project result in an increase in the frequency or severity of existing air quality violations?*

   Since the consistency criteria identified under the first criterion pertains to pollutant concentrations, rather than to total regional emissions, an analysis of the Project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating Project consistency. As discussed in the analysis under Threshold AQ-3, localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant during Project construction and operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations.[1]

b) *Would the project cause or contribute to new air quality violations?*

   As discussed in the analysis under Threshold AQ-2, the Proposed Project would result in emissions that are below the SCAQMD thresholds. Therefore, the Project would not have the potential to cause or contribute to a violation of the ambient air quality standards.

c) *Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

   The Proposed Project would result in less than significant impacts with regard to regional and localized concentrations during Project construction and operations; refer to the discussion under Thresholds AQ-2 and AQ-3. As such, the Project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

---

1 Due to the role reactive organic gases play in ozone formation, they are classified as a precursor pollutant and only a regional emissions threshold has been established.

Criterion 2:

With respect to the second criterion, it is important to recognize that air quality planning within the SCAB focuses on attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether the Proposed Project exceeds the assumptions used in preparing the forecasts presented in the 2022 AQMP. Determining whether a project exceeds these assumptions involves the evaluation of the three criteria outlined below. The following discussion analyzes each criterion.

a) *Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?*

   Growth projections included in the 2022 AQMP form the basis for the projections of air pollutant emissions and are based on General Plan land use designations and SCAG's 2020-2045 RTP/SCS demographics forecasts. The population, housing, and employment forecasts in the 2020-2045 RTP/SCS are based on local general plans as well as input from local governments, such as the City. The SCAQMD has incorporated these same demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment) into the 2022 AQMP.

   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. Therefore, the Project would not change the existing land use types and would not directly or indirectly induce substantial unplanned population growth. Therefore, the Project would be consistent with the site's General Plan land use designation and zoning, and associated growth projections.

   Additionally, as the SCAQMD has incorporated these same projections into the 2022 AQMP, it can be concluded that the Proposed Project would be consistent with the projections included in the 2022 AQMP. A less than significant impact would occur in this regard.

b) *Would the project implement all feasible air quality mitigation measures?*

   The Proposed Project would result in less than significant air quality impacts. Compliance with all feasible emission reduction rules and measures identified by the SCAQMD would be required as identified in the analyses under Thresholds AQ-2 and AQ-3. As such, the Proposed Project meets this 2022 AQMP consistency criterion and no mitigation measures are required.

c) *Would the project be consistent with the land use planning strategies set forth in the AQMP?*

   Land use planning strategies set forth in the 2022 AQMP are primarily based on the 2020-2045 RTP/SCS. The Project would provide bicycle parking spaces and electric vehicle (EV) charging stations on-site, as required by the California Building Standards Code, which would encourage and support alternative transportation methods. Therefore, the Project would be consistent with the actions and strategies of the 2020-2045 RTP/SCS. In addition, as discussed above, the Project would be consistent with the General Plan land use designation. As such, the Proposed Project meets this AQMP consistency criterion.

In conclusion, the Project is consistent with the SCAQMD's criteria and thus would not conflict with or obstruct implementation of the 2022 AQMP.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

Threshold AQ-2: ***Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.***

Short-Term Construction Impacts

The Project would be constructed over five phases, and each phase would include demolition, grading, building construction, paving, and architectural coating applications. The Project would be constructed over approximately seven years from the second quarter of 2025 through the first quarter of 2032. It should be noted that Phase 2 includes a parking lot option and a parking structure option. As the parking structure option involves more construction activities and more soil export, the parking structure option was modeled as a conservative analysis. Earthwork would involve approximately: 3,600 cubic yards of soil import during Phase 1; 5,100 cubic yards of soil export during the Phase 2 parking structure option; 250 cubic yards of soil import during Phase 3; 750 cubic yards of soil import during Phase 4; and 350 cubic yards of soil export during Phase 5. Exhaust emission factors for typical diesel-powered heavy equipment are based on the CalEEMod version 2022.1 program defaults. Variables factored into estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the amount of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. Refer to **Appendix C** for the CalEEMod outputs and results. **Table 3.2-6**, **Project-Generated Construction Emissions**, presents the Project's anticipated daily short-term construction emissions.

TABLE 3.2-6
PROJECT-GENERATED CONSTRUCTION EMISSIONS

Emissions Source	Pollutant (pounds per day)[a]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025 Emissions	4.28	39.3	40.2	0.06	4.25	2.55
2026 Emissions	5.89	44.8	62.2	0.10	6.00	3.08
2027 Emissions	5.16	44.7	54.4	0.09	5.00	2.83
2028 Emissions	1.20	9.85	16.4	0.03	1.22	0.50
2029 Emissions	4.25	32.1	37.5	0.06	3.79	2.20
2030 Emissions	1.13	9.21	15.9	0.03	1.18	0.47
2031 Emissions	4.06	30.1	36.9	0.06	3.72	2.12
2032 Emissions	1.58	8.61	15.1	0.03	1.14	0.43
Maximum Daily Emissions	**5.89**	**44.8**	**62.2**	**0.10**	**6.00**	**3.08**
SCAQMD Significance Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: Refer to Appendix C for assumptions used in this analysis.

a. Emissions were calculated using CalEEMod version 2022.1. The higher emissions between summer and winter were presented as a conservative analysis. Modeling assumptions include compliance with SCAQMD Rule 403, which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading, excavation, and construction is expected to be short term and would cease upon Project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. PM_{10} is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and sulfur oxides (SO_X) combining with ammonia. $PM_{2.5}$ components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations.

The Project would implement required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.) to reduce PM_{10} and $PM_{2.5}$ concentrations. As demonstrated in **Table 3.2-6**, the total PM_{10} and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction. Thus, PM_{10} and $PM_{2.5}$ emissions impacts associated with Project construction would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the Project site, employee commutes to the Project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the site. As presented in **Table 3.2-6**, construction equipment and worker vehicle exhaust emissions (i.e., ROG, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$) would not exceed the established SCAQMD threshold for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. In accordance with the methodology prescribed by the SCAQMD, ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Regulation XI, Rule 1113 – *Architectural Coating,* all architectural coatings for the proposed structures would comply with specifications on painting practices as well as regulations on the ROG content of paint (SCAQMD 2016). ROG emissions associated with the proposed Project would be less than significant; refer to **Table 3.2-6**.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos is naturally occurring, and can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos-bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the Department of Conservation Division of Mines and Geology, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report* (August 2000), serpentinite and ultramafic rocks are not known to occur within the Project area. Thus, no impacts would occur in this regard.

As discussed further in **Section 3.7**, **Hazards and Hazardous Materials**, of this EIR, due to the age of the current structures on the site, there is the potential for asbestos to have been used in the building materials. Prior to demolition activities, the District would conduct a survey for ACMs. In the event that ACMs are found, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations, including 40 CFR Part 763 Subpart E, Asbestos-Containing Materials in Schools Rule and SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities. With compliance with relevant regulations and requirements, Proposed Project construction activities would not expose people to a significant release of asbestos.

Long-Term Operational Emissions

Long-term operational air quality impacts consist of mobile source emissions generated from Project-related traffic and emissions from stationary area and energy sources. As a conservative analysis, stationary area and energy sources emissions from the existing uses on-site were not modeled or deducted from Project-generated emissions. Emissions associated with each of these sources are detailed in **Table 3.2-7**, **Project-Generated Operational Emissions**, and discussed below.

Area Source Emissions

Area source emissions would be generated due to consumer products, architectural coating, and landscaping. As shown in **Table 3.2-7**, area source emissions during both summer and winter would not exceed established SCAQMD thresholds. Impacts would be less than significant in this regard.

Energy Source Emissions

Energy source emissions would be generated because of electricity and natural gas usage associated with the Proposed Project. The primary use of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Energy source emissions would not exceed established SCAQMD thresholds; refer to **Table 3.2-7**. Impacts in this regard would be less than significant.

Mobile Source

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

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 Project operation 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 vehicle miles traveled (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. As such, the Project would not generate mobile source emissions, and impacts in this regard would be less than significant.

Total Operational Emissions

As shown in **Table 3.2-7**, the total operational emissions for both summer and winter would not exceed established SCAQMD thresholds. Therefore, impacts in this regard would be less than significant.

TABLE 3.2-7
PROJECT-GENERATED OPERATIONAL EMISSIONS

Emissions Source	Pollutant (pounds per day)[a]					
	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Area	2.47	0.05	5.76	<0.01	0.01	0.01
Energy	0.02	0.38	0.32	<0.01	0.03	0.03
Mobile	0.00	0.00	0.00	0.00	0.00	0.00
Total Summer Emissions	**2.49**	**0.42**	**6.08**	**<0.01**	**0.04**	**0.04**
SCAQMD Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Project Winter Emissions						
Area	1.52	0.00	0.00	0.00	0.00	0.00
Energy	0.02	0.38	0.32	<0.01	0.03	0.03
Mobile	0.00	0.00	0.00	0.00	0.00	0.00
Total Winter Emissions	**1.54**	**0.38**	**0.32**	**<0.01**	**0.03**	**0.03**
SCAQMD Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: Refer to Appendix C for assumptions used in this analysis.

a. Emissions were calculated using CalEEMod version 2022.1, as recommended by the SCAQMD. The numbers may be slightly off due to rounding.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors, ROG and NO_X, affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the SCAQMD (April 6, 2015) for the *Sierra Club vs. County of Fresno,* it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons, including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (April 13, 2015) for *Sierra Club vs. County of Fresno*, currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that health effects from O_3, as an example, is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. The SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD states that based on its own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of ROG would reduce O_3 levels at its highest monitored sites by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_X or ROG emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Project would not exceed SCAQMD thresholds for construction and operational air emissions, the Project would have a less than significant impact on air quality health impacts.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

Threshold AQ-3: Expose sensitive receptors to substantial pollutant concentrations.

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. The CARB has identified the following groups of individuals as those 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 nearest sensitive receptors are the single- and multifamily residences approximately 50 feet or more to the north, west, and south. The multifamily residences to the west are the closest to the Project site.

Localized Significance Thresholds

LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the *Final Localized Significance Threshold Methodology* (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, $PM_{2.5}$, and/or PM_{10} (see **Table 3.2-6**). The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The Project site is located within SRA 2, Northwest Los Angeles County Coastal.

Construction LST

The SCAQMD guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day.[2] The SCAQMD provides LST thresholds for one-, two-, and five-acre site disturbance areas, but none for projects over five acres. The Project would actively disturb approximately one acre per day during grading of all five construction phases. Therefore, the LST thresholds for one acre were used for the construction LST analysis. The closest sensitive receptors are the multifamily residences approximately 50 feet west of the Project boundary. These sensitive land uses may be potentially affected by air pollutant emissions generated during on-site construction activities. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. According to the SCAQMD LST methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters. As the nearest sensitive receptors are located approximately 50 feet (15 meters) from the planned construction area, the LST values for 25 meters were used.

Table 3.2-8, **Localized Significance of Construction Emissions – Maximum Pounds per Day**, shows the localized construction-related emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ compared to the LSTs for SRA 2. It is noted that the localized emissions presented in **Table 3.2-8** are less than those in **Table 3.2-6** because localized emissions include only on-site emissions (e.g., from construction equipment and fugitive dust) and do not include off-site emissions (e.g., from hauling activities). As shown in **Table 3.2-8**, the Project's localized construction emissions would not exceed the LSTs for SRA 2. Therefore, localized significance impacts from Project-related construction activities would be less than significant.

TABLE 3.2-8
LOCALIZED SIGNIFICANCE OF CONSTRUCTION EMISSIONS – MAXIMUM POUNDS PER DAY

Emissions Source	Pollutant (pounds per day)[i]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
2025 Emissions[a]	38.50	37.80	3.53	2.40
2026 Emissions[b]	25.40	30.40	2.92	1.88
2027 Emissions[c]	43.49	48.80	3.64	2.49
2028 Emissions[d]	8.92	12.90	0.30	0.28
2029 Emissions[e]	31.60	35.70	3.24	2.08
2030 Emissions[f]	8.39	12.90	0.26	0.24
2031 Emissions[g]	29.70	35.40	3.12	2.00
2032 Emissions[h]	7.87	12.80	0.22	0.21
Maximum Daily Emissions	**43.49**	**48.80**	**3.64**	**2.49**
Localized Significance Threshold[j]	*103*	*562*	*4*	*3*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes: Refer to Appendix C for assumptions used in this analysis.

---

[2] The number of acres represent the total acres traversed by grading equipment. In order to properly grade a piece of land, multiple passes with equipment may be required. The disturbance acreage is based on the equipment list and days of the grading phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday.

Table 3.2-8, Notes

a. The overlapping of Phase 1 Demolition and Phase 1 Grading emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2025.
b. The overlapping of Phase 1 Building Construction and Phase 2 Grading emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2026.
c. The overlapping of Phase 2 Building Construction, Phase 3 Demolition, and Phase 3 Grading emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2027.
d. The Phase 3 Building Construction emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2028.
e. The overlapping of Phase 4 Demolition and Phase 4 Grading emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2029.
f. The Phase 4 Building Construction emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2030.
g. The overlapping of Phase 5 Demolition and Phase 5 Grading emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2031.
h. The Phase 5 Building Construction emissions are presented as the worst-case scenario for NO_X, CO, PM_{10}, and $PM_{2.5}$ in 2032.
i. The reduction/credits for construction emissions are based on control strategies included in CalEEMod and are required by the SCAQMD Rules. The control strategies applied in CalEEMod include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.
j. The LST was determined using Appendix C of the SCAQMD's Final Localized Significant Threshold Methodology guidance document for pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$. The LST was based on the anticipated daily acreage disturbance for construction (approximately one-acre; therefore, the one-acre threshold was used) for SRA 2, Northwest Los Angeles County Coastal.

Operational LST

According to SCAQMD LST methodology, LSTs would apply to operational activities if the project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Project does not include such uses. Thus, due to the lack of such emissions, long-term LST analysis is not quantified. Operational LST impacts would be less than significant in this regard.

Carbon Monoxide Hot Spots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (e.g., adversely affecting residents, school children, hospital patients, and the elderly).

The SCAB is designated as an attainment/maintenance area for the federal CO standards and an attainment area under state standards. There has been a decline in CO emissions even though VMT on US urban and rural roads have increased; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions (USEPA n.d.). Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD *CEQA Air Quality Handbook*, a potential CO hot spot may occur at any location where the background CO concentration already exceeds 9.0 ppm, which is the 8-hour California ambient air quality standard. As previously discussed, the site is in SRA 2. Communities within SRAs are expected to have similar climatology and ambient air pollutant concentrations. The monitoring station representative of SRA 2 is the Los Angeles – North Main Street station. The maximum CO concentration at Los Angeles – North Main Street station was measured at 1.672 ppm in 2022; refer to **Table 3.2-3**. Given that the background CO concentration does not currently exceed 9.0 ppm, a CO hot spot would not occur at the Project site. Therefore, CO hot spot impacts would be less than significant in this regard.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

3.2.6 CUMULATIVE IMPACT ANALYSIS

With respect to the Proposed Project's construction-related air quality emissions and cumulative SCAB-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2022 AQMP pursuant to federal Clear Air Act mandates. As such, the Proposed Project would comply with SCAQMD Rule 403 requirements and the adopted 2022 AQMP emissions control measures. Rule 403 requires that fugitive dust be controlled with the best available control measures to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the Proposed Project. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements would also be imposed on construction projects throughout the Basin, which would include related projects.

Table 3-1, **Cumulative Projects List**, identifies projects within the City of Santa Monica which may have construction activities potentially overlapping with the Proposed Project construction phases, and the location of these projects are shown on **Figure 3-1**. According to the SCAQMD *CEQA Air Quality Handbook*, project-related emissions that fall below the established construction and operational thresholds should be considered less than significant unless there is pertinent information to the contrary. As discussed previously, the Proposed Project would not result in short- or long-term air quality impacts, as emissions would not exceed the SCAQMD adopted construction or operational thresholds. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. As a result, the Proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, the Project's incremental construction and operational impacts would be less than cumulatively considerable and impacts in this regard are less than significant.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

3.3 CULTURAL RESOURCES

This section of the EIR addresses potential cultural resources impacts that may result from construction and/or operation of the Roosevelt Elementary School Campus Plan Project (Proposed Project). The following discussion addresses existing cultural resources conditions of the affected environment, evaluates the Proposed Project's consistency with applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Proposed Project, as applicable.

The analysis in this section is largely based on the Roosevelt Elementary School Campus Plan prepared by dsk Architects and Moore Ruble Yudell (2023); the City of Santa Monica Environmental Impact Report prepared for the City's 6th Cycle 2021-2029 Housing Element Update (June 2021); and the Roosevelt Elementary School Historic Resources Inventory Report (January 2022) and Roosevelt Elementary School Campus Plan Project Historical Resources Technical Report (May 2024) prepared by Historic Resources Group (HRG) (see **Appendix B.1** and **B.2**, respectively). The Historic Resources Technical Report includes an architectural Design Vision statement (Appendix D of **Appendix B.2**), which provides the campus plan architect's intent to respect and maintain the historical resources on the Roosevelt school campus, while balancing adaptive reuse and new construction with the need to meet the District's adopted educational standards (dsk Architects; Moore Ruble Yudell Architects & Planners 2024). Additionally, a California Historical Resources Information Search was performed by Michael Baker at the South Coast Information Center on October 25, 2023 (Michael Baker 2023; see **Appendix B.3**). Information from these documents is incorporated by reference herein.

3.3.1 ENVIRONMENTAL SETTING

Archaeological Resources

Archaeology studies human artifacts which may include places, objects, or settlements that represent a group or individual religious, cultural, or other activities. Such resources may include historic and/or prehistoric remains of human activity. Historic-period resources may include physical structures, structural ruins (i.e., remnants of building foundations); sites such as artifact deposits or artifact-filled features); objects; or places noted for their engineering, architecture, cultural use, or association. Prehistoric resources may include lithic artifact or ceramic scatters; quarries; habitation sites; temporary camps/rock rings; ceremonial sites; monuments; canals; historic roads and trails; bridges; and/or ditches.

Available evidence suggests human occupation of mainland Southern California as far back as 13,000 years or more. A limited number of known sites dating back to this period indicates that population densities along the coast may have been low; however, many ancient sites may have been lost, inundated, or deeply buried as a result of rising sea levels, shoreline retreat, erosion, sediment deposition, and other natural forces (City of Santa Monica 2021b).

Within the southern California region, it is understood that prehistoric human occupation and cultures evolved substantially over more than 10,000 years based on changes in climate, food availability, technological innovations, and utilization and changes in population densities and cultural characteristics. Prehistoric remains that may potentially exist in the City and the Greater Los Angeles area could be from various past cultural epochs; however, it is anticipated they would most likely represent past occupation by the Gabrielino/Tongva or other Takic Native Americans (City of Santa Monica 2021b).

The Gabrieliño/Tongva occupied territory extended from the Los Angeles Basin south to Orange County and north to Topanga Canyon and the southern Channel Islands. The Gabrieliño/Tongva territory covered more than 1,500 square miles and included the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers and the islands of Santa Catalina, San Clemente, and San Nicolas. This territory is known to have included more than 50 villages with populations ranging from an estimated 50 to 150 individuals. Each individual community was comprised of one or more lineages that controlled a specific geographic territory including a permanent residential settlement, hunting and gathering areas, and ritual sites. The Gabrieliño/Tongva exhibited a complex culture, social organization, religious beliefs, and art and material production. In particular, the known Gabrieliño/Tongva village at Kuruvungna Springs, located approximately two miles east of Downtown Santa Monica on the University High School campus (approximately 2.6 miles northeast of the Proposed Project site), suggests that the Gabrieliño/Tongva occupied and utilized natural resources within the area over an extended period (City of Santa Monica 2021b).

As evidenced, the Greater Los Angeles area is known to support significant subsurface archaeological resources with a high level of habitation/seasonal habitation and resource use by Native Americans over past centuries. Historically, the area known as present-day City of Santa Monica offered a favorable environment for Native American settlement due to its location along the Pacific Ocean on a relatively level bluff above the Santa Monica Bay, with freshwater springs available at nearby Ballona Creek and Santa Monica Canyon. However, the recordation of archaeological resources is not well-documented due to intensive regional development that occurred prior to modern archaeological study and the application of environmental protections for cultural resources (City of Santa Monica 2021b).

Since 1875, many surface deposits have been obscured by development; however, the City is situated on a terrace with uphill slopes trending to the north toward the Santa Monica Mountains, and it is anticipated that alluvial sediments eroding from such higher elevations have covered older archaeological deposits over the millennia prior to 1875. As such, archaeological deposits thousands of years in age may exist at unknown depths within the City, providing information about the occupation, settlement practices, economy, trade, and life of Native Americans in the region during ancient times (City of Santa Monica 2021b).

Prior to the 1920s, much of the present-day commercial core in the Downtown Santa Monica area supported residential dwellings on individual lots. As many such residences have since been removed or replaced, old foundations and artifact-filled archaeological deposits may remain within these lots. Ongoing construction since the 1920s may have also destroyed older deposits in some locations, and therefore, such sites may still contain intact buried deposits at unknown depths. Archaeological deposits from the 1870s-1920s have the potential to provide important information about the economy, consumer practices, product availability, and household lifestyles of residents during the early history of the City (City of Santa Monica 2021b).

As demonstrated by archaeological record searches and literature reviews conducted in the City over the last several decades, previously identified buried archaeological resources are generally limited to a small number of historic period sites located throughout the City (City of Santa Monica 2021b). In highly urbanized settings, the original ground surface is typically not available for visual inspection; however, prehistoric or historic archaeological deposits may be present under the ground surface in native soils.

At present day, the City represents a highly urbanized setting, dating back to the late 1800s, that is largely built out within its boundaries. Such historic development has resulted in disturbed native soils, reducing the potential for intact buried pre-historic archaeological resources. However, given that the City is located in an area with known historic occupation and use by the Gabrieliño/Tongva, the potential buried archaeological resources does remain.

Built Environment

Surrounding Uses

Several potential and/or listed historical resources are present in the neighborhoods surrounding the Proposed Project site. The Mont Mar Apartment complex is located across 9th Street from the school campus at 909-911 Montana Avenue and is a designated City landmark. Four additional properties in the Proposed Project vicinity (located at 624 Lincoln Boulevard; 702 Lincoln Boulevard; 633 9th Street; and 717 9th Street) were identified in a 2018 Citywide survey and appear to be eligible for listing as City of Santa Monica landmarks (HRG 2024). Additionally, the property at 901 Montana Avenue was identified in the 2018 Citywide survey as eligible for listing as a contributor to the potential Montana Avenue Commercial Conservation District.[1]

Project Site

The original Roosevelt Elementary School campus was constructed in 1907 at 6th Street and Montana Avenue in Santa Monica; however, the school was severely damaged by the Long Beach Earthquake of 1933. The campus was demolished and was rebuilt in 1935 at its current location. Designed by the master Los Angeles architectural firm Marsh, Smith, & Powell, the campus buildings exhibit the smooth surfaces, curved corners, and horizontal banding typical of buildings constructed under the auspices of the Works Progress Administration (WPA) and Public Works Administration (PWA), commonly referred to as the PWA Moderne style of architecture. The school design integrated indoor and outdoor spaces with varying concrete patios located adjacent to classroom wings, emblematic of the new “Santa Monica Plan” developed by the architects (HRG 2024).

Development of the school campus continued into the 1940s with buildings designed by Joe M. Estep under the auspices of the WPA. Such additions centered the campus in the south-central portion of the property with PWA Moderne-style buildings on a finger-plan school plant. Buildings constructed in the 1930s and early 1940s were cohesively designed with new Moderne buildings specifically intended to withstand seismic events (HRG 2024).

Post-World War II, new development on the school campus was intermittently constructed and was focused in the western portion of the site. In 1951, several buildings were designed by architect Joe M. Estep that reoriented the school’s primary entrance to Lincoln Boulevard. In 1968, the original cafeteria was demolished, a new library was built, and a classroom was expanded. In the 1990s, a mix of permanent buildings, temporary buildings, and support structures were added in an ad hoc manner to accommodate additional educational needs (HRG 2024).

Historic District Assessment

A historical resources evaluation was conducted for the Roosevelt Elementary School campus to identify potential historical resources on the campus (HRG 2024). The buildings and features of

1 Architectural Resources Group and Historic Resources Group, *City of Santa Monica Citywide Historic Resources Inventory Update Survey Report,* prepared for the City of Santa Monica, August 9, 2018.

the Roosevelt Elementary School campus were considered collectively for their potential eligibility for listing in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and/or listing at the local level as a potential historic district. The findings were recorded in a Historic Resources Inventory Report (HRG 2022; refer to **Appendix B.1**), which identified a historic district consisting of six contributing buildings, five site features, and two additional features eligible for listing in the California Register and for designation as a City of Santa Monica historic district.

The historic district was found eligible for listing[2] within the context of the PWA development of school campuses in the post-Long Beach earthquake years of the 1930s and for its PWA Moderne design by notable architects Marsh, Smith, & Powell. Details of the contributing components of the historic district are listed in **Table 3.3-1**, **Features Included in the Historic District**. Refer also to **Figures 2-4** and **2-5** for photographs of the historic features and their locations on the Proposed Project site.

All other buildings and features on the campus were determined to be ineligible for listing at the federal, State, and local levels and are therefore not further addressed in this EIR. Refer to Appendix A of **Appendix B.1** for additional discussion.

Historic Significance

The Long Beach earthquake of 1933 and WPA program are reflective in the design of the Roosevelt Elementary School campus buildings. Following the earthquake, widespread school renovation and reconstruction occurred within the region. Additionally, the passage of the Field Act in 1934, which set new standards for school construction in Southern California, substantially transformed how school campuses were designed and built.

Although many other area schools were rehabilitated or upgraded during post-Long Beach earthquake years, Roosevelt Elementary was redesigned as a new campus using Marsh, Smith, & Powell's new "Santa Monica Plan" design approach. The school reflects the change in building design away from large, masonry buildings to sleek, wood-framed school plans specifically intended to withstand seismic activity. Additionally, the WPA was heavily involved in the school's expansion. The school thereby reflects a significant improvement in infrastructure during this period when skilled engineers, architects, and artists were employed to better institutions in Santa Monica and elsewhere. The reimagined earthquake-resistant design and WPA involvement at the school reflect the significant changes to the built environment of the City and greater southern California area during the mid-1930s to early 1940s.

Roosevelt Elementary School is also considered significant under NRHP Criterion C, California Register Criterion 3, and City of Santa Monica Criteria 4 and 5 for its design. As noted, the school serves as a prominent, cohesive, and intact collection of PWA Moderne educational buildings constructed post-Long Beach earthquake of 1933. Early campus buildings dating back to 1935 were designed by the master architectural firm of Marsh, Smith, & Powell who incorporated the clean lines of the PWA Moderne style with a new intimate and functional school plant that emphasized indoor-outdoor spaces, natural light, and fresh air. The school's classroom wings, outdoor patios, and landscaping reflect the architectural elements of the new "Santa Monica Plan" established by the firm at Roosevelt Elementary School, and subsequently modeled at later

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

schools. Roosevelt Elementary School subsequently came to influence school design across the country, which increasingly avoided monumental and ornamented buildings for the modern and functional school plants designed by Marsh, Smith, & Powell. In 1940, Joe M. Estep, under the supervision of the WPA, expanded the school's buildings, utilizing the same design guidelines established in the first phase of development. Completed under the auspices of the WPA, these buildings similarly reflect the PWA Moderne-style of architecture. As a result, the campus buildings exhibit a unified visual character (HRG 2022).

The period of significance for Roosevelt Elementary School spans from 1935 to 1940. Refer also to **Table 3.3-1**, which identifies the buildings and features dating from the period of significance that remain on the school campus today. The period of significance begins in 1935 when Buildings E, F, C, J, and K, designed by Marsh, Smith, & Powell, were constructed using federal and local funds. The Lincoln & Montana Quad and South Courtyard were open spaces created with the construction of these early buildings. The brick flagpole ring and brick wall were also completed in this early stage of construction. In 1940, Joe Estep expanded the campus with Buildings B and C. This construction created the north courtyard; funded by the WPA, a bronze plaque commemorates this construction. Contributing features are those buildings that were constructed during the period of significance (including the 1935 portion of Building K). Regarding the eligible quad and courtyards, it is the spatial organization, rather than the landscaping, that is significant and continues to convey the designs envisioned by Marsh, Smith, & Powell and Joe M. Estep, and partially funded by the WPA (HRG 2022).

Assessment of Integrity

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

TABLE 3.3-1. FEATURES INCLUDED IN THE HISTORIC DISTRICT

Current Feature Name	Building Use	Architectural Style/Description	Year Built	Integrity	Status	Proposed Action
Buildings						
Building B	Classrooms	PWA Moderne	1940	Good	Contributor	Demolish
Building C	Classrooms	PWA Moderne	1940	Good	Contributor	Demolish
Building E	Classrooms	PWA Moderne	1935	Good	Contributor	Retain/Rehabilitate
Building G	Classrooms	PWA Moderne	1935	Good	Contributor	Demolish
Building J	Offices/Classroom	PWA Moderne	1935	Good	Contributor	Retain/Rehabilitate
Portion of Building K	Pre-School	PWA Moderne	1935	Good	Contributor	Demolish
Site Features						
Lincoln & Montana Quad	--	--	1935	Good	Contributor	Demolish
South Courtyard	--	--	1935	Good	Contributor	Retain/Rehabilitate
North Courtyard	--	--	1940	Good	Contributor	Demolish
Brick Ring	--	--	1935	Fair	Contributor	Retain
Brick Wall	--	--	1935	Fair	Contributor	Retain
Additional Features						
"Theodore Roosevelt" Panel	--	Stone Relief	c. 1935	Very Good	Contributor	Retain
WPA Bronze Plaque	--	Metal Sign	1940	Very Good	Contributor	Retain

Source: HRG 2024

The following provides a description of the individual elements that contribute to the historic district, as identified in **Table 3.3-1**. Such elements include buildings, site features, and other additional site features.

Historic Contributing Buildings

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 flat roofs 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 flat roofs 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 soccer green and track athletic field and rear paved area, is present along the west elevation. The building was expanded with additions constructed in 1951 and 1968.

Building E (Classrooms). Building E was constructed in 1935 and designed by architects Marsh, Smith, & 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 flat roofs 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, & 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 and is connected to Buildings E, H, J, and K via a series of canopied outdoor corridors with flat roofs and wide eaves upheld by steel pipe columns.

Building J (Administration Offices/Classroom). Building J was constructed in 1935 and designed by architects Marsh, Smith, & Powell. The structure is located between Buildings H and K and is connected to Buildings E, G, H, and K via a series of canopied outdoor corridors with flat roofs 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, & 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 flat roofs 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.

Historic Site 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 used 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 Building E and Buildings 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 occupies the courtyard formed by 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 1 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).

Additional Features

"Theodore Roosevelt" Panel. This stone relief panel was completed by the WPA and installed during the school's construction 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 and is located between Building J and H. The plaque was completed by the WPA.

Archaeological Resources

The Proposed Project site has been under some degree of development since original construction of the campus in 1935. Subsequent development has resulted in intermittent grading and excavation activities over the past few decades.

A California Historical Resources Information Search was performed by Michael Baker at the South Coast Information Center on October 25, 2023; refer to **Appendix B.3**. The records search indicated no previous studies were performed within the Proposed Project site, and one previous cultural resources study has been completed within a quarter-mile search radius. Two previously recorded resources were identified within the Proposed Project site which included contributors to the Santa Monica Public Schools Thematic District (formed by six schools in the City which retain their historical appearance and architectural style) and the Roosevelt Elementary School historic district, based on their overall integrity; other than these two previously recorded resources, no associated surveys were identified as being performed on the site to date. No additional resources were identified within one-quarter mile of the Proposed Project site (Michael Baker 2023).

No archaeological sites are documented within the Proposed Project site or within one-quarter mile of the site. The closest archaeological sites are a cemetery and refuse scatter associated with the Marquez Adobe, located approximately 0.6 mile northwest of the Proposed Project site (Michael Baker 2023).

Based on such results, the site is considered to have a low sensitivity for the presence of archaeological resources. However, the potential for unknown resources to occur onsite does exist.

Native American Consultation

Refer to **Section 3.10, Tribal Cultural Resources**, of this Draft EIR for additional discussion of tribal cultural resources relative to the Proposed Project. No known resources identified as tribal cultural resources, as defined in Public Resources Code (PRC) section 21074, have been identified within the Roosevelt Elementary School campus area. No tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources, are known within the existing campus boundaries.

In accordance with California Assembly Bill (AB) 52 and PRC section 21080.3.1, the District sent formal notification letters to consult with two Native American tribes that have previously requested notification from the District. The notification letters were 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 notification letters sent to the tribes by the District included a description of the Proposed Project, 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. The SMMUSD has not received any responses from the Native American tribes contacted. Therefore, consultation was not required and did not take place.

3.3.2 REGULATORY SETTING

Federal

<u>National Historic Preservation Act and National Register of Historic Places</u>

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the NRHP, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The NRHP is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archaeology, engineering, and culture. The NRHP recognizes resources of local, State, and national significance that have been documented and evaluated according to uniform standards and criteria.

Authorized under the NHPA, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources. The NHRP is administered by the National Park Service, which is part of the US Department of the Interior. To be eligible for listing in the NRHP, a resource must meet at least one of the following criteria:

A. Is associated with events that have made a significant contribution to the broad patterns of our history.

B. Is associated with the lives of persons significant in our past.

C. Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.

D. Has yielded, or may be likely to yield, information important in history or prehistory.

Historic Integrity

National Park Service Guidance

Integrity

Historic integrity is the ability of a property to convey its significance. It is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period" (NPS 1997). The National Park Service (NPS) defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.

Period of Significance

The NPS defines period of significance as "the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for ... listing" in National, State or local registers. A period of significance can be "as brief as a single year …[or] span many years." It is based on "specific events directly related to the significance of the property," for example the date of construction, years of ownership, or length of operation as a particular entity (NPS 1997a).

Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods, places, and historic contexts as historic districts. The NPS defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (NPS 1997b). Historic district derives its significance as a single unified entity.

According to the NPS, "a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole" (NPS 1997b). Resources that have been found to contribute to the historic identity of a district are referred to as district contributors.

Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

As identified by the NPS, school campuses, which are often geographically concentrated and purpose-built, are often evaluated as historic districts. Schools in the United States, especially those built in the 20th century, often exhibit definable campuses and unified site plans which reflect individual building's interconnectedness and functionality as a larger grouping. Although historic districts can contain resources built during distinct periods of development, many school campus historic districts reflect a specific era of development and are contained within a common period of significance.

Native American Graves Protection and Repatriation Act

Adopted in 1990, the Native American Graves Protection and Repatriation Act is a federal law mandating museums and federal agencies to return certain Native American cultural items (human remains, funerary objects, sacred objects, or objects of cultural patrimony) to lineal descendants or culturally affiliated Native American tribes.

State

California Environmental Quality Act (CEQA)

Under CEQA (Public Resources Code §§ 21000 et seq.), public agencies must consider the effects of their discretionary actions on both historical resources and unique archaeological resources. Pursuant to Public Resources Code (PRC) section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. Section 21083.2 requires agencies to determine whether Proposed Projects would have impacts on unique archaeological resources.

The term *historical resource* is defined in PRC section 21084.1 and further described in the State CEQA Guidelines section 15064.5. Under section 15064.5(a), historical resources include the following:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC § 5024.1).

2. A resource included in a local register of historical resources, as defined in PRC section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register of Historical Resources (CRHR) (PRC § 5024.1), including the following:

    a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

    b) Is associated with the lives of persons important in our past;

    c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

    d) Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to PRC § 5020.1(k)), or identified in a historical resources survey (meeting the criteria in § 5024.1(g)) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC section 5020.1(j) or 5024.1.

Historical resources are usually 50 years old or older and generally must meet at least one of the above criteria for listing in the CRHR (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient level of physical integrity.

For historic buildings, CEQA Guidelines section 15064.5(b)(3) expresses that the impacts of a project that follows the Secretary of the Interior's Standards for either the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Rehabilitation and Guidelines for Rehabilitating Historic Buildings, have been mitigated to a less than significant level.

As noted, CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources. PRC section 21083.2(g) states:

> "Unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

(2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.

(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Treatment options under section 21083.2 include activities that preserve such resources in place in an undisturbed state. Other acceptable methods of mitigation under section 21083.2 include excavation and curation or study in place without excavation and curation (if the study finds that the artifacts would not meet one or more of the criteria for defining a unique archaeological resource).

Section 7050.5(b) of the Health and Safety Code specifies protocol when human remains are discovered, as follows:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with § 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of section 27492 of the Government Code or any other related provisions of law concerning investigation of 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.

CEQA Guidelines section 15064.5(e) directs excavation activities stop whenever human remains are uncovered and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are those of Native Americans, the NAHC must be contacted within 24 hours. At that time, the lead agency must consult with the appropriate Native Americans, if any, as timely identified by the NAHC. Section 15064.5 directs the lead agency (or applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains.

In addition to the provisions pertaining to accidental discovery of human remains, the Guidelines also recommend that a lead agency make provisions for the accidental discovery of historical or archaeological resources. Pursuant to section 15064.5(f), these provisions should include "an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be an historical or unique archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be available. Work could continue on other parts of the building site while historical or unique archaeological resource mitigation takes place."

California Register of Historical Resources

The State Historical Resources Commission designed the CRHR for use by state and local agencies, private groups, and citizens to identify, evaluate, register and protect California's historical resources. The CRHR is the authoritative guide to the state's significant historical and archaeological resources. This program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protections under CEQA.

Health and Safety Code Sections 7050.5, 7051, and 7054

These sections of the Health and Safety Code address the illegality of interference with human burial remains and the disposition of Native American burials on an archaeological site. The law protects remains from disturbance, vandalism, and inadvertent destruction and establishes procedures that outline protection measures if remains are found on the site during construction.

Assembly Bill (AB) 52

AB 52 requires a lead agency to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of a 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 Proposed Projects in 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 (PRC § 21080.3.1[d]). Refer to **Section 3.10**, **Tribal Cultural Resources**, of this EIR for details regarding tribal consultation.

Local

SMMUSD Board Policy 7113

In February 2021, the District adopted Board Policy 7113 and the accompanying Administrative Regulation 7113, which were developed to identify and clarify treatment of historical resources present on properties within the District's jurisdiction. The Board Policy and Administrative Regulation require completion of an inventory of historical resources of a school campus prior to or at the onset of the planning and design process.

City of Santa Monica

Construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan. Per Government Code section 53094, it is anticipated that the SMMUSD School Board will pass a Resolution to exempt the Roosevelt Elementary School Campus Plan from City of Santa Monica General Plan and zoning ordinance provisions, at the time when the EIR is certified by the District. As such, the discussion of the City's General Plan and zoning ordinance is provided below as background information.

The City of Santa Monica formally initiated a historic preservation program with its 1976 adoption of the Landmark and Historic Preservation Ordinance. This ordinance established the Landmarks Commission whose powers include designation of structures of merit and landmarks, and recommendation to the City Council for the designation of historic districts. Furthermore, it identified both obligations required of historic property ownership and a broad range of incentives available to owners of historic properties.

Section 9.56.100 of the City of Santa Monica Landmark and Historic Preservation Ordinance authorizes the Landmarks Commission to designate landmarks or historic districts. A geographic area or a noncontiguous grouping of thematically related properties may be designated a historic district by the City Council. An individually significant property may be designated a landmark. Such designations may be made provided that the subject property (or properties) meets one or more of the following criteria:

- 9.56.100(a)(1). It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.
- 9.56.100(a)(2). It has aesthetic or artistic interest or value, or other noteworthy interest or value.
- 9.56.100(a)(3). It is identified with historic personages or with important events in local, state or national history.
- 9.56.100(a)(4). It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.
- 9.56.100(a)(5). It is a significant or a representative example of the work or product of a notable builder, designer or architect.
- 9.36.100(a)(6). It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

3.3.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines (as amended) contains analysis guidelines related to the assessment of cultural resources. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold CUL-1: ***Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5.***

Threshold CUL-2: ***Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5.***

Threshold CUL-3: ***Disturb any human remains, including those interred outside of formal cemeteries.***

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiated that, based on the thresholds of significance, Proposed Project impacts related to cultural resources may be potentially significant. Therefore, all criteria require further evaluation.

3.3.4 PROJECT DESIGN FEATURES

There are no specific Proposed Project design features that are applicable to cultural resources.

3.3.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

Evaluation of the Proposed Project's potential to result in a significant impact on cultural resources is based in part on information provided in the City of Santa Monica Environmental Impact Report prepared for the City's 6th Cycle 2021-2029 Housing Element Update (June 2021) and the resource identification and evaluation efforts presented in the Roosevelt Elementary School Campus Plan Project Historical Resources Technical Report, prepared by HRG (September 2024; see **Appendix B.2**).

This analysis evaluates anticipated changes in the physical environment resulting from the Proposed Project against the thresholds of significance identified above, to determine if direct and indirect changes from existing conditions would constitute potentially significant effects. Project changes are described and potential impacts, if any, are identified under each impact discussion. Where impacts would be considered potentially significant, mitigation measures are identified to reduce impacts to a less than significant level, where feasible.

Per CEQA Guidelines section 15064.5(b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

CEQA Guidelines section 15064.5(b) further states that "[t]he significance of an historical resource is materially impaired when a project…[d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources…or that account for its inclusion in a local register of historic resources… or its identification in a historic resources survey."

Threshold CUL-1: Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5.

As discussed, the Proposed Project would result in substantial demolition and new construction throughout the school campus over five planned phases. The existing historic district identified at Roosevelt Elementary School is comprised of six contributing buildings, five site features, and two additional features.

The Proposed Project would result in demolition of four contributing buildings (Buildings B, C, G, and K) to the identified historic district located both centrally and on the periphery of the district. The four buildings to be demolished comprise a majority (approximately 67%) of buildings that contribute to the historic district and reflect both the original 1935 "Santa Monica Plan" design of the school as well as its expansion by the WPA in 1940. With implementation of the Proposed Project, only two of the contributing buildings (Buildings E and J) to the historic district (approximately 32%) would remain intact on the school campus (HRG 2024). The North Courtyard and Lincoln and Montana Quad would be removed; the South Courtyard would remain. The brick flagpole ring would be removed, while the remaining contributing features including the WPA bronze plaque, and brick wall would remain with Proposed Project implementation; refer also to **Figure 2-5**.

According to US National Park Service guidelines, for a historic district to retain integrity as a whole, the majority of the components that comprise a district's historic character must possess integrity, even if they are undistinguished on an individual basis. Further, the spatial relationships between a district's components must remain substantially unchanged since the period of significance. However, no specific numeric threshold has been identified to assess when a project compromises the integrity of a historic district and therefore represents an adverse impact to the resource.

As proposed, demolition of the majority of the historic district's contributing buildings would remove important components of its overall design and plan including original buildings, courtyards, and open-air corridors. As such, the physical development of Roosevelt Elementary School during its period of significance (1935-1940) would no longer be fully represented, as the majority of the physical elements constructed during that time would be removed. Although two contributing buildings and one contributing courtyard (South Courtyard) would remain with implementation of the Proposed Project, such elements represent a limited portion of the overall school as originally constructed during the 1930s.

As a result, the integrity of the historic district would be substantially compromised due to demolition of a majority of contributing buildings and it would no longer fully convey its original associations with PWA development of school campuses in the post-Long Beach earthquake years of the 1930s; PWA Moderne architecture by notable architects Marsh, Smith, & Powell; or the "Santa Monica Plan" school campus design. Demolition of these contributors would alter the integrity of the historic district such that it would no longer retain sufficient historic integrity or be eligible for listing as a historical resource at the State or local levels. Therefore, the Proposed Project would result in a potentially significant impact to a historical resource as defined by CEQA.

The NPS defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."[3] As designed, the Proposed Project would retain and rehabilitate three remaining contributors to the historic district (Building E, Building J, and the South Courtyard). These elements are associated with the original school design by Marsh, Smith, & Powell and ultimately came to represent the "Santa Monica Plan" school campus design. The proposed rehabilitation would include removal of several incompatible alterations and the restoration of Buildings E and J (based on available archival photographs and drawings) to more closely achieve their original 1935 architectural design. Rehabilitation would occur consistent with the Secretary of the Interior's Standards for Rehabilitation and all work would occur under the supervision of a qualified historical architect. The South Courtyard would also be renovated with the Proposed Project to provide new useable outdoor space. The South Courtyard and its spatial relationship with Buildings E and J is considered to be a contributing element to the identified historic district. Much of the original landscape within the South Courtyard has been previously altered. With the proposed improvements, the South Courtyard would still retain its open space and relationship to Buildings E and J.

Therefore, rehabilitation of Buildings E and J, along with the South Courtyard, would preserve important features characteristic of the original 1935 campus designed by Marsh, Smith, & Powell and recognized as the "Santa Monica Plan." These features include two one-story classroom

---

3 "Secretary of the Interior's Standards and Guidelines: Preservation Terminology," http://www.cr.nps.gov/local-law/arch_stnds_10.htm.

wings with covered, open-air corridors (Buildings E and J) sharing an outdoor courtyard (South Courtyard). The Proposed Project would better return these elements closer to their original appearance, allowing Buildings E and J to better reflect their original PWA Moderne architectural style.

Additionally, when originally constructed in 1935, unobstructed views of Buildings E and J on the school campus were afforded from Lincoln Boulevard and Montana Avenue. Subsequent construction of other on-site buildings along the Lincoln Boulevard frontage and in the foreground along Montana Avenue (non-contributors to the historic district; see **Figure 2-5**) between Buildings E and J and the campus boundary have since concealed them from public view. The Proposed Project would remove the later buildings and redesign the campus so that Buildings E and J would again be visible and accessible from the original entrance to the campus. The Proposed Project would also place new buildings around and separate from Buildings E and J and the South Courtyard, thereby reinforcing their historic position as the central buildings on the campus.

However, as proposed, preservation of Buildings E and J, along with the South Courtyard, would not retain enough of the contributing elements of the historic district to avoid a significant impact to the historic district under CEQA. Retention and rehabilitation of these buildings and the South Courtyard would preserve characteristics of the original campus design directly associated with Marsh, Smith, & Powell and the PWA Moderne style of architecture, allowing these components to continue to express key tenets of the “Santa Monica Plan” design as originally envisioned by the architects.

Additionally, the Proposed Project would not result in demolition, construction, or rehabilitation that would reduce the integrity or significance of nearby potential and/or listed historical resources. The Mont Mar Apartment complex is located across 9th Street from the school campus at 909-911 Montana Avenue and is a designated City landmark. Four additional properties in the Proposed Project vicinity (located at 624 Lincoln Boulevard; 702 Lincoln Boulevard; 633 9th Street; and 717 9th Street) were identified in a 2018 Citywide survey and appear to be eligible for listing as City of Santa Monica landmarks (HRG 2024). Additionally, the property at 901 Montana Avenue was identified in the 2018 Citywide survey as eligible for listing as a contributor to the potential Montana Avenue Commercial Conservation District.[4] Of these historic structures, the nearest is the residence located at 901 Montana Avenue, located approximately 66 feet east of the school property. The Proposed Project would not result in substantial increases in building height or density that would create significant shadows or otherwise adversely impact the existing setting or other characteristics of these surrounding properties. The proposed new construction would be a maximum of two stories in height (32 feet) and would be compatible with the historic materials, features, size, scale, and massing of similar nearby educational buildings and other identified historical resources. The school campus would retain its educational use, and some of its character-defining features would remain/become visible from adjacent public rights-of-way. Further, the Proposed Project would maintain a similar relationship with the surrounding neighborhood as it did historically in the 1930s.

Additionally, groundborne vibrations generated by Proposed Project construction activities have the potential to result in damage to offsite structures from ground shaking. As discussed in EIR

4 Architectural Resources Group and Historic Resources Group, *City of Santa Monica Citywide Historic Resources Inventory Update Survey Report,* prepared for the City of Santa Monica, August 9, 2018.

Section 3.8, Noise, the nearest structures to the school campus are residential buildings located approximately 50 feet to the northwest of the proposed onsite parking lot; the nearest listed offsite historic structure is located approximately 66 feet from the Proposed Project boundary. As the proposed onsite parking lot would be constructed using vibratory rollers, potential effects from use of such construction equipment was considered. Based on the Federal Transit Administration (FTA) data, vibration velocities from typical heavy construction equipment operation that would be used during Proposed Project construction range from 0.035 to 0.210 in/sec peak particle velocity (PPV) at 25 feet from the source of activity. The vibratory roller for the proposed parking lot would generate the greatest vibration. At a distance of 50 feet, the vibratory roller would generate 0.098 inches/second (in/sec) PPV, which would be well below the Caltrans threshold of 0.5 in/sec PPV. Therefore, vibration velocities at the nearest listed historic structure are not expected to exceed the Caltrans threshold of 0.25 in/sec PPV for historic buildings. Short-term construction is not anticipated to have a significant impact related to groundborne vibrations on any designated offsite historic properties.

Operation of the Proposed Project would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. As indicated in EIR **Section 3.8**, the Proposed Project would not create vibration-induced impacts to the nearest offsite historical resources.

As such, the Proposed Project would not adversely affect the eligibility of any historical resources in the vicinity for listing at the federal, State, or local levels. Potential impacts to off-site historical resources would be less than significant.

To reduce potential impacts of the Proposed Project on historical resources, Mitigation Measures **MM CUL-1** through **MM CUL-3** would be implemented. However, impacts would remain significant and unavoidable, even with the incorporation of such measures, as the Proposed Project would result in substantial alteration or permanent removal of historical resources from the site, leading to a loss of integrity of the onsite historic district.

Mitigation Measures (Phases 1 through 5)

MM CUL-1 **Documentation:** In order to document the historic district as the first example of the “Santa Monica Plan” and its contribution to 1930s and 1940s school design, prior to the issuance of demolition permits, the onsite historic district shall be documented according to Historic American Building Survey (HABS) Level III standards. The documentation shall provide information to future researchers on the significant first school campus built by Marsh, Smith, & Powell as their “Santa Monica Plan,” with an emphasis on seismic stability, natural light and air, access to the outdoors, open-air corridors, and student-oriented learning spaces. The HABS Level III documentation shall be prepared by a historian or architectural historian who meets the Secretary of the Interior’s Historic Preservation Professional Standards in the relevant discipline. Digital copies of the documentation shall be offered to the following repositories: the Santa Monica Public Library; Santa Monica-Malibu School District; City of Santa Monica Planning Division; and the Santa Monica Conservancy.

MM CUL-2 **Interpretation:** The Santa Monica-Malibu Unified School District shall develop an interpretive program describing the history of the “Santa Monica Plan” and Roosevelt Elementary School. The interpretive program shall be made accessible to the public and may include historic photographs or other ephemeral materials documenting the history of school design in Santa Monica, the creation of the "Santa Monica Plan" by architects Marsh, Smith & Powell and its significance following the 1933 Long Beach earthquake, the development of Roosevelt Elementary School as an early example of this school design, and other relevant themes as determined.

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

Level of Significance After Mitigation

Implementation of Mitigation Measures **MM CUL-1** through **MM CUL-3** would require preparation of adequate documentation by qualified professionals, rehabilitation consistent with the Secretary of the Interior Standards for the contributing features to remain, and that impacts are reduced to the extent feasible. However, the Proposed Project would result in substantial alteration or permanent removal of historical resources from the site, thereby leading to a loss of integrity of the onsite historic district. Pursuant to CEQA, a historical resource must retain enough integrity, including materials, design, workmanship, setting, feeling, association, and/or location, to convey its historical and architectural significance. As such, impacts to historical resources in this regard would remain significant and unavoidable, even with implementation of mitigation measures.

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5.

As stated, the Roosevelt Elementary School campus is a developed site located within an urbanized portion of the City of Santa Monica. There are no known archaeological resources within the Proposed Project area (Michael Baker 2023) and sensitivity for encountering archaeological resources during the construction phase is considered to be low due to the developed condition of the site and extent of prior ground disturbance.

Construction of each planned 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 construction of the Proposed Project, particularly during grading or excavation for new building foundations. Historic-period archaeological resources have the potential to be encountered within fill sediments and native soils and sediments; prehistoric archaeological resources have the potential to be encountered within native soils and sediments.

Therefore, the Proposed Project is considered to have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5. The Proposed Project would implement Mitigation Measure **MM CUL-4** which would require a qualified archaeologist to conduct sensitivity training in advance of ground-disturbing activities for each phase and to be retained and available during any ground disturbance. Mitigation Measure **MM CUL-4** also provides measures to be taken in the event cultural resources are inadvertently discovered during construction. With implementation of Mitigation Measure **MM CUL-4**, impacts to archaeological resources would be reduced to a less than significant level.

Mitigation Measures (Phases 1 through 5)

MM CUL-4 Prior to issuance of any permits allowing ground-disturbing activities for the Proposed Project (for each individual phase), the Santa Monica-Malibu Unified School District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the Project and will be on-call during all grading and other significant ground-disturbing activities. The qualified archaeologist shall ensure that the following measures are followed for the Proposed Project:

- Prior to any ground disturbance, the qualified archaeologist, or their designee, shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural (prehistoric and historic) resources. As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural resources be discovered during construction.

- In the event that a prehistoric archaeological site (such as any unusual amounts of stone, bone, or shell) or a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted. The Sana Monica-Malibu Unified School District shall be notified of the potential find and a qualified archaeologist shall be retained to investigate its significance.

- If significant Native American cultural resources are discovered for which a treatment plan must be prepared the Santa Monica-Malibu Unified School District or the archaeologist on call shall contact the applicable Native American tribal contact(s). If requested by the Native American tribe(s), the project applicant or archaeologist on call shall, in good faith, consult on the discovery and its disposition (e.g., avoidance, preservation, reburial, return of artifacts to tribe).

- Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the California Register of Historic Resources standards of significance, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the Santa Monica-Malibu Unified School District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

Level of Significance After Mitigation

Implementation of Mitigation Measure **MM CUL-4** would require an archaeological preconstruction meeting as well as proper evaluation, treatment, and documentation of any discovered significant resources. Implementation of Mitigation Measure **MM CUL-4** would reduce impacts to archaeological resources to a less than significant level.

Threshold CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.

There are no known human remains in the Proposed Project area. Additionally, new construction or renovations undertaken over past decades to expand or replace the on-site educational and recreational facilities have resulted in a high degree of disturbance on the Proposed Project site.

All anticipated phases of construction (Phases 1 through 5) would have some component of ground disturbance or excavation. Buildout of the Roosevelt Elementary School campus would result in new buildings, sports fields and courts, play areas, landscaping, and parking, which could impact undiscovered human remains if encountered during ground-disturbing activities.

All construction and operation activities associated with the Proposed Project would require conformance with PRC section 5097.98 and section 7050.5 of the Health and Safety Code if human remains are encountered. Conformance with such regulations would ensure that the Proposed Project does not disturb any human remains, including those interred outside of formal cemeteries, and that impacts remain less than significant.

Mitigation Measures

None required, as impacts are less than significant without mitigation.

Level of Significance

Impacts are less than significant without mitigation.

3.3.6 CUMULATIVE IMPACT ANALYSIS

Cumulative projects that have the potential to be considered in a cumulative context with the Proposed Project's incremental contribution, and that are included in the analysis of cumulative impacts relative to cultural resources, are identified in **Table 3-1** and **Figure 3-1** in **Section 3.0** of this EIR. The cumulative impact analysis includes projects with a 0.5-mile radius to the extent that they may contribute to certain issue-specific cumulative effects. As shown in **Figure 3-1**, there are no known cumulative projects located within a 0.5-mile radius of the Proposed Project site, thereby reducing the potential for the Proposed Project to contribute to a significant cumulative effect with consideration for other area projects.

Urban development over past decades in Los Angeles County has resulted in adverse impacts on cultural resources. However, the adoption of State and federal laws related to cultural resources has provided a mechanism to address potential impacts of development activities on known and/or unknown cultural resources. Although inadvertent discoveries and potential impacts may still result on a project-by-project basis based on location, development type, and availability of data, compliance with regulatory procedures generally reduces potential impacts to cultural resources. Federal, State, and local laws protect cultural resources in most instances, but they are not always feasible, particularly when in-place preservation may complicate or prevent the implementation of a development project. Future development may conflict with these resources through inadvertent destruction or removal resulting from grading, excavation, and/or construction activities.

The Proposed Project site supports a number of structures that have been determined to constitute an eligible historic district. As noted, the Proposed Project would result in a significant and unavoidable impact to historical resources on the school campus as a result of loss of integrity of the identified historic district, such impacts are not anticipated to contribute to a significant impact on a cumulative level. Mitigation Measures **MM CUL-1** to **MM CUL-3** would be implemented to reduce the Proposed Project's contribution to potential cumulative effects on the City's historical resources. Impacts would be less than cumulatively considerable.

As identified in **Section 3.0**, SMMUSD is actively undertaking renovations to other schools within its boundaries. Within the cumulative study area, such facilities include: Lincoln Middle School (0.5 miles to the northeast); John Adams Middle School (1.9 miles to the southeast); Grant Elementary School (2.3 miles to the southeast); Franklin Elementary School (1.1 miles to the northeast); and McKinley Elementary School (1.3 miles to the northeast). Refer to **Figure 3-1** showing these locations. As part of these renovation actions, the District has assessed the potential for historical resources at each campus, and where such schools have been determined to support historic components as part of their respective campuses, evaluation of the potential for the loss of significant historical resources to occur as the result of the proposed modernization efforts has been undertaken.

Of these campuses, John Adams Middle School, Grant Middle School, Franklin Elementary School, and McKinley Elementary School were found to include eligible historical resources. Of these, John Adams Middle School, Grant Middle School, and Franklin Elementary School, were also largely designed in the PWA Moderne style within the primary period of development (1930s – 1940s), similar to Roosevelt Elementary School. Additionally, John Adams Middle School and Franklin Elementary School were designed by the same master architecture firm, Marsh, Smith & Powell, as Roosevelt Elementary School. John Adams Middle School also embodies the new "Santa Monica Plan," like the Proposed Project.

Similar to the Proposed Project, the historic district at John Adams Middle School was recommended eligible under CRHR Criterion 1 and the City of Santa Monica Criterion 1 within the context of the PWA development of school campuses in the post-Long Beach Earthquake years of the 1930s, and also under CRHR Criterion 3 and the City of Santa Monica Criteria 4 and 5 for the distinctive characteristics of a type, period, and method of construction, notably that of the PWA Moderne-style buildings with wood framing (Ascent 2022). The Adams Middle School Campus Improvement Project Initial Study indicated that the historic district would retain eligibility for designation following implementation of the modernization activities (Ascent 2022).

For improvements proposed at Grant Middle School, studies identified a historic district at the campus eligible for listing in the CRHR and for designation as a City of Santa Monica historic district (Historical Resources Group 2022). The Grant Elementary School Campus Master Plan Project Initial Study determined that with implementation of the proposed modernization efforts, the historic district would retain sufficient historic fabric to continue to be eligible for listing in the

CRHR and as a local City of Santa Monica Landmark, and impacts to historical resources were found to be less than significant (Placeworks 2023a).

The Historic Resources Inventory Report prepared for the Franklin Elementary School campus identified that Building B (Main Building) is individually eligible for listing in the CRHR and the City of Santa Monica listing. Building B is associated with important patterns of history related to Santa Monica's civic and institutional development; is a good example of PWA Moderne architecture; and is a singularly significant work of master architects Marsh, Smith, and Powell, similar to the Proposed Project. With implementation of proposed improvements, the Franklin Elementary School Campus Plan Project Initial Study/Mitigated Negative Declaration determined that the Main Building would continue to retain its integrity of setting at the completion of the improvements (Michael Baker 2022). Impacts were determined to be less than significant.

For improvements planned at the McKinley Elementary School campus, studies identified a historic district on the campus eligible for listing in the CRHR and for designation as a City of Santa Monica historic district. As designed, the project was determined to retain the character-defining features on contributing buildings and that those features which convey the school's historical and architectural values would be preserved (Placeworks 2023b). Impacts were determined to be less than significant, and the implementation of mitigation measures was not required.

While the characterization of historical resources is generally a site-specific and individualistic resource area, as analyzed for the SMMUSD campuses, the historic character-defining attributes at the Proposed Project site are neither the sole embodiment of PWA Moderne architecture, nor the only work of master architects Marsh, Smith, and Powell, nor are they the singular example of the Santa Monica Plan. As evaluated, the SMMUSD's modernization projects shown on **Figure 3-1** would preserve the majority of the historic district sufficient to retain eligibility, as well as a portion of the contributing features on Proposed Project campus. As a result, the Proposed Project's incremental contribution to cumulative impacts to historical resources is not considered significant.

Similarly, other cumulative projects, where resources of potential historic value may be present, would require evaluation and determination of eligibility for listing at the federal, State, and/or local levels as part of the City's discretionary process and in accordance with applicable regulatory requirements. As appropriate, mitigation measures would be identified to reduce potential impacts on such resources to the extent feasible, thereby reducing the potential for contribution to a cumulative loss of historical resources at the local or regional levels. Additionally, as applicable, discretionary projects would be subject to requirements the City of Santa Monica Landmark and Historic Preservation Ordinance which addresses structures of historic merit and landmarks; designation of historic districts; and obligations required of historic property ownership, along with incentives for owners of historic properties.

As discussed, there are no known archaeological resources on the Proposed Project site (Michael Baker 2023). The site is currently developed and supports the existing school campus which was originally constructed in 1935. Intermittent improvements involving demolition, rehabilitation, and/or new construction onsite have occurred over past decades since that time, resulting in further ground disturbing and excavation activities. As such, the site is considered to have a low sensitivity for the presence of archaeological resources. However, the potential for unknown resources to occur onsite does exist.

Proposed Project construction activities would include grading and excavation. Project implementation could therefore contribute to potential cumulative impacts on cultural resources, including unknown archaeological resources, as well as unknown buried human remains. If destroyed, such impacts to cultural resources would be considered potentially significant. However, such impacts, if resources were to be discovered, would be localized and limited to the Proposed Project site, Mitigation included herein (**MM CUL-4**) addresses the potential for encountering undiscovered archaeological resources, and the protection of human remains is required by State law. Such mitigation would require a preconstruction meeting, monitoring, and construction and/or grading work to be halted upon discovery of such resources to ensure their protection. Mitigation identified would reduce the potential for the Proposed Project to contribute to a significant cumulative impact on unknown archaeological resources to a less than significant level. The Proposed Project's contribution to such impacts would be less than cumulatively considerable. Cumulative projects within the surrounding area may also have the potential to contribute to the loss of archaeological resources and/or human remains within the local or regional setting. Such projects would be subject to City discretionary review and conformance with applicable regulatory requirements aimed at the reduction of potential adverse effects on and/or loss of such resources. As appropriate, mitigation measures would be required to reduce such effects, thereby minimizing or avoiding the potential to contribute to a cumulative impact on such resources at the regional or local level.

Mitigation Measures

Implement Mitigation Measures **MM CUL-1** to **MM CUL-4**.

Level of Significance After Mitigation

Less than significant.

This page intentionally left blank.

3.4 ENERGY

This section of the EIR evaluates potential effects associated with energy consumption and energy plan consistency of the Proposed Project area that may result from construction and/or operation of the Roosevelt Elementary School Campus Plan. Such impacts include the depletion of nonrenewable resources (e.g., oil, coal) and emissions of pollutants during both construction and operations. Mitigation measures are recommended to avoid or reduce potential impacts, As applicable.

The analysis in this section is largely based on California Emissions Estimator Model (CalEEMod) output files (**Appendix C**), which are incorporated by reference herein.

3.4.1 ENVIRONMENTAL SETTING

Electricity Service

Southern California Edison (SCE) provides electrical services in most areas of Los Angeles County, including the City of Santa Monica, through state-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric plants. Unlike petroleum production, generation of electricity is usually not tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatt (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy produced by a unit, minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

Natural Gas Service

The Southern California Gas Company (SoCalGas) provides natural gas services to the City. Natural gas is a hydrocarbon fuel found in reservoirs beneath the earth's surface and is composed primarily of methane. It is used for space and water heating, process heating, and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in the coming years because it is a relatively clean alternative to other fossil fuels like oil and coal. In California and throughout the western United States, many new electrical generation plants that are fired by natural gas are being brought online. Thus, there is great interest in importing liquefied natural gas from other parts of the world. Nearly 45 percent of the electricity consumed in California is currently generated using natural gas (CEC 2023b: 58, 62). While the supply of natural gas in the United States and production has increased greatly, California produces little, and imports 90 percent of its natural gas (CEC 2023d).

Energy Usage

Energy usage is typically quantified using the British thermal unit (BTU). Total energy usage in California was 7,387.9 trillion BTU in 2021 (the most recent year for which this specific data is available) (USEIA 2021). Of California's total energy usage, the breakdown by sector is 47.8 percent transportation, 24.3 percent industrial, 12.7 percent commercial, and 15.2 percent residential (USEIA 2023). Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use. In 2022, taxable gasoline sales (including aviation gasoline) in California accounted for 13,919,678,835 gallons of gasoline (CDTFA 2023). The electricity consumption attributable to Los Angeles County from 2013 to 2022 is shown in **Table 3.4-1**, **Electricity Consumption in Los Angeles County, 2013-2022**.

TABLE 3.4-1
ELECTRICITY CONSUMPTION IN LOS ANGELES COUNTY, 2013-2022

Year[a]	Electricity Consumption (in millions of kilowatt hours)
2013	68,280
2014	69,860
2015	69,461
2016	69,365
2017	68,591
2018	67,834
2019	66,742
2020	65,566
2021	66,003
2022	68,485

Source: CEC 2023a.
Notes:
a. Electricity consumption data is not available for the City of Santa Monica. The year 2022 is the most recent year for which the County's electricity consumption data is available.

The natural gas consumption in Los Angeles County from 2013 to 2022 is shown in **Table 3.4-2**, **Natural Gas Consumption in Los Angeles County, 2013-2022**.

TABLE 3.4-2
NATURAL GAS CONSUMPTION IN LOS ANGELES COUNTY, 2013-2022

Year[a]	Natural Gas Consumption (in millions of therms)
2013	3,065
2014	2,794
2015	2,761
2016	2,878
2017	2,956
2018	2,922
2019	3,048
2020	2,937
2021	2,883
2022	2,820

Source: CEC 2023c.
Notes:
a. Natural gas consumption data is not available for the City of Santa Monica. The year 2022 is the most recent year for which the County's natural gas consumption data is available.

Gasoline/Diesel Fuels

Automotive fuel consumption in Los Angeles County from 2013 to 2022 and projections for 2023 is shown in **Table 3.4-3**, **Automotive Fuel Consumption in Los Angeles County, 2013-2023**.

TABLE 3.4-3
AUTOMOTIVE FUEL CONSUMPTION IN LOS ANGELES COUNTY, 2013-2023

Year	On-road Automotive Fuel Consumption (Gallons)	Off-road Equipment Fuel Consumption (Gallons)
2013	4,173,407,883	31,412,517
2014	4,211,469,581	32,380,286
2015	4,326,848,476	33,324,823
2016	4,480,187,933	34,221,807
2017	4,468,352,951	35,091,687
2018	4,409,152,566	35,918,628
2019	4,337,453,104	36,717,728
2020	3,873,168,111	30,373,898
2021	4,323,377,195	30,359,249
2022	4,291,007,510	30,353,204
2023 (projected)	4,238,500,098	30,352,640

Source: CARB 2023c.

3.4.2 REGULATORY SETTING

Federal

Federal Energy Policy and Conservation Act

The Energy and Conservation Action of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of US crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions. The federal government issued new CAFE standards in 2012 for model years 2017 to 2025 that required a fleet average of 54.5 miles per gallon (mpg) for model year 2025. However, on March 30, 2020, the US Environmental Protection Agency (USEPA) finalized an updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021–2026. The SAFE Vehicles Rule sets tough but feasible fuel economy and carbon dioxide standards that increase 1.5 percent in stringency each year from model years 2021 through 2026. These standards apply to both passenger cars and light trucks and will continue the nation’s progress toward energy independence and GHG emissions reduction, while recognizing the realities of the marketplace and consumers’ interest in buying vehicles that meet all their diverse needs.

On December 21, 2021, under direction of Executive Order 13990 issued by President Biden, the National Highway Traffic Safety Administration repealed SAFE Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. On April 1, 2022, the National Highway Traffic Safety Administration announced new proposed fuel standards in response to Executive Order 13990. Fuel efficiency under the standards announced new vehicle fuel economy standards for model years 2024–2026. The standards require that fleet average 49 mpg by 2026, save consumers money, and advance US energy independence (NHTSA 2022).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which aims to increase US energy security, develop renewable energy production, and improve vehicle fuel economy (USEPA 2023):

- Federal agencies to reduce energy intensity by 3 percent per year compared to a fiscal year (FY) 2003 baseline by FY 2015.
- Agencies to identify all "covered facilities" that constitute at least 75 percent of the agency's facility energy use and designate an energy manager at each.
- Agencies must complete energy evaluations at 25 percent of covered facilities annually and are encouraged to implement identified energy efficiency measures within two years of evaluations.
- Agencies must recommission or retro-commission covered facilities every four years to verify that building systems are functional and properly operated and maintained.
- At least 30 percent of hot water demand in new or renovated federal buildings must come from solar hot water heating, if life-cycle cost-effective.

State

Renewables Portfolio Standard (RPS)

Senate Bill 350

Senate Bill (SB) 350 (De Leon) was signed into law in September 2015. SB 350 establishes tiered increases to the RPS of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirements. Under SB 100, the RPS for public-owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24)

In 1978, the California Energy Commission (CEC) established the Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The 2022 Title 24 became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

California Green Building Code

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. CALGreen is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed CALGreen in an effort to meet the state's landmark initiative Assembly Bill 32 goals, which established a comprehensive program of cost-effective reductions of GHG emissions to 1990 levels by 2020. CALGreen was developed to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, and healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.

California Public Utilities Commission Energy Efficiency Strategic Plan

The California Public Utilities Commission prepared an Energy Efficiency Strategic Plan in September 2008 with the goal of promoting energy efficiency and a reduction in GHGs. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the state between 2009 and 2020, and beyond 2020. The Strategic Plan contains the practical strategies and actions to attain significant statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the west, nationally and internationally. The plan includes the four bold strategies:

1. All new residential construction in California will be zero net energy by 2020;

2. All new commercial construction in California will be zero net energy by 2030;

3. HVAC will be transformed to ensure that its energy performance is optimal for California's climate; and

4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted SB 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

The CEC adopted the 2022 Integrated Energy Policy Report Update on February 28, 2023. The 2022 IEPR Update provides the results of the CEC's assessments of a variety of energy issues facing California, many of which will require action if the state is to meet its climate, energy, air quality, and other environmental goals while maintaining reliability and controlling costs. Overall, the recent IEPRs identifies actions the state and others can take that would strengthen energy resiliency, reduce GHG emissions that contribute to climate change, improve air quality, and contribute to a more equitable future.

Executive Order N-79-20

Executive Order N-79-20, issued September 23, 2020, directs the state to require all new cars and passenger trucks sold in the state to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the state will be zero-emission by 2045.

Local

City of Santa Monica General Plan

The City of Santa Monica General Plan includes a Housing Element with policy recommendations that support energy use. The Housing Element includes policies and objectives to facilitate sustainable housing development and to maintain current energy conservation and production programs (Objectives 1.d and 1.e). This includes furthering the goals and targets set forth in three sustainability plans, including the Solar Santa Monica program, which aims to provide solar energy on all feasible buildings by 2020. Additionally, the Santa Monica Municipal Code (SMMC) Article 8, Building Regulations, establishes the minimum building requirements through the administration and enforcement of the California Building Standards Code as adopted by the City. Provisions in Article 8 apply to the construction, alteration, moving, demolition, repair, site preparation, use, maintenance and occupancy of buildings, structures, and building service equipment, and serve as the administrative, organizational, and enforcement rules and regulations for the applicable codes and standards. These standards typically include specifications on building features that involve energy usage. However, as a state-owned facility, as are all public schools in California, construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan or Article 8 of the SMMC.

Santa Monica-Malibu Unified School District

Districtwide Plan for Sustainability

The District adopted the Districtwide Plan for Sustainability (Sustainability Plan) in February 2019 with the following objectives: providing "a strategic roadmap for formalizing and uniting the District's many existing sustainability initiatives; incorporating sustainability into Education Services and all aspects of student learning; and integrating climate protection, resource efficiency, waste management, and other sustainability practices into District operations. The Sustainability Plan is organized into eight sustainability focus areas: Climate, Education + Engagement, Energy Efficiency + Renewables, Water, Solid Waste, Transportation, Food, Nutrition + Wellness, and Green Building + Operations." Further, the Sustainability Plan "establishes a framework for assessment and progress on each focus area by documenting baseline conditions, establishing key goals and performance indicators, highlighting current initiatives and best practices, recommending improvement strategies, and anticipating project costs and funding mechanisms. The Sustainability Plan concludes with recommendations for the resources, monitoring and reporting strategies, and public communication considerations needed to successfully implement a plan of this magnitude."

California Collaborative for High Performance Schools Criteria

The Collaborative for High Performance Schools (CHPS) began in November 1999, when the CEC called together Pacific Gas and Electric Company, San Diego Gas and Electric, and SCE to discuss the best way to improve the performance of California's schools. Out of this partnership, CHPS grew to include a diverse range of government agencies, utility companies, school districts, nonprofit organizations, and private companies, all with a unifying goal: to improve the quality of educational facilities for California's children. When the first version of the CA-CHPS Criteria was released in late 2001, it was in anticipation of an unprecedented wave of new school construction, which has since crested and retreated over the last few years of recession. The CHPS Criteria emphasizes good indoor air quality, natural daylighting, and excellent acoustics.

Since 2004, CHPS has endeavored for the CHPS Criteria to be responsive to renovations/modernizations. It is more important with the passage of Proposition 39, which would be infusing $2.5 billion into energy efficiency retrofits for existing schools. With the current 2014 edition of the CA-CHPS Criteria, CHPS introduces the High Performance Transition Plan as a pathway for incremental improvement and recognition for schools that undertake a phased series of renovation/modernization projects that would not have enough scope to be recognized as a CHPS Verified or CHPS Designed project on their own.

Strategic Energy Management Plan

The District is participating in the Continuous Energy Improvement Program in partnership with SCE and SoCalGas. This program is a consultative service aimed at helping commercial customers engage in long-term, strategic energy planning. Subsequently, the District has partnered with a consulting team to develop an energy plan, establish energy goals and targets, and implement behavioral change programs. Through this program, the District developed a Strategic Energy Management Plan outlining its energy strategy and goals. The District has not yet formally adopted the Strategic Energy Management Plan.

3.4.3 THRESHOLDS OF SIGNIFICANCE

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, or unnecessary consumption of energy. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold ENE-1: ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

Threshold ENE-2: ***Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?***

The analysis under **Section 3.4.5**, Threshold ENE-1, relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- **Criterion 2**: The effects of the Project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3**: The effects of the Project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4**: The degree to which the Project complies with existing energy standards.
- **Criterion 5**: The effects of the Project on energy resources.
- **Criterion 6**: The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the Proposed Project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criteria 2, 4**, and **5**. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses **Criteria 2**, **4**, and **6**, and the building energy demand analysis discusses **Criteria 2**, **3**, **4**, and **5**.

3.4.4 PROJECT DESIGN FEATURES

There are no Proposed Project design features for energy efficiency.

3.4.5 IMPACT ANALYSIS AND MITIGATION DISCUSSION

Methodology for Analysis

The impact analysis focuses on the three sources of energy that are relevant to the Proposed Project: electricity and natural gas associated with Project operations and the fuel consumption for Project construction. It should be noted that the Proposed Project is not expected to add any additional trips during operation. The analysis of electricity and natural gas usage during Project operation is based on the CalEEMod version 2022.1 modeling, which quantifies energy use for occupancy. The Proposed Project's estimated electricity and natural gas usage is based primarily on CalEEMod's default settings for Los Angeles County, and default consumption factors from the California Commercial End Use Survey database. As a conservative analysis, energy consumption from the existing uses on-site were not modeled or deducted from the Proposed Project's energy consumption. The results of the CalEEMod modeling are included in **Appendix C**. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. The results of the modeling and construction fuel estimates are included in **Appendix C**.

Threshold ENE-1: ***Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.***

Estimated energy consumption resulting from the Proposed Project is summarized in **Table 3.4-4, Project and Countywide Electricity and Natural Gas Consumption**, and **Table 3.4-5, Project and Countywide Construction Fuel Consumption**. As shown in **Table 3.4-4**, the Proposed Project's energy usage during operations would constitute an approximate 0.0009 percent increase over Los Angeles County's typical annual electricity consumption and an approximate 0.0005 percent increase over Los Angeles County's typical annual natural gas consumption (**Criterion 1**). As discussed above, energy consumption from the existing uses on-site were not modeled or deducted from the Proposed Project's energy consumption as a conservative analysis.

TABLE 3.4-4
PROJECT AND COUNTYWIDE ELECTRICITY AND NATURAL GAS CONSUMPTION

Energy Type (unit)	Project Annual Energy Consumption	County Annual Energy Consumption	Countywide Consumption Percentage Increase
Electricity (MWh)	647	68,484,956	0.0009%
Natural Gas (therms)	13,962	2,820,285,935	0.0005%

Source: CEC 2023a, CEC 2023c.

As shown in **Table 3.4-6**, the Proposed Project's construction fuel consumption would increase Los Angeles County's on-road and off-road fuel consumption by up to 0.0006 percent and 0.1465 percent, respectively, both during Phase 3 of the Proposed Project. It should be noted that 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; as such, the Proposed Project would not result in more vehicle trips to and from the school during operations when compared to existing conditions. As such, no increase to operational fuel consumption is anticipated.

TABLE 3.4-5
PROJECT AND COUNTYWIDE CONSTRUCTION FUEL CONSUMPTION

Phases	Project On-Road Fuel Consumption (gallons)	Countywide On-Road Fuel Consumption (gallons)	Countywide On-Road Fuel Consumption Percentage Increase	Project Off-Road Fuel Consumption (gallons)	Countywide Off-Road Fuel Consumption (gallons)	Countywide Off-Road Fuel Consumption Percentage Increase
Phase 1[a]	17,297	4,068,799,996	0.0004%	37,408	30,235,604	0.1237%
Phase 2[b]	14,432	3,981,438,709	0.0004%	30,844	30,265,281	0.1019%
Phase 3[c]	21,761	3,905,748,751	0.0006%	44,355	30,274,317	0.1465%
Phase 4[d]	21,738	3,765,389,689	0.0006%	44,203	30,597,974	0.1445%
Phase 5[e]	9,555	3,642,196,563	0.0003%	21,650	30,804,852	0.0703%

Source: CARB 2023c.
Notes:
a. The fuel consumptions are compared with projected data of the year of Phase 1 construction start, which is 2025.
b. The fuel consumptions are compared with projected data of the year of Phase 2 construction start, which is 2026.
c. The fuel consumptions are compared with projected data of the year of Phase 3 construction start, which is 2027.
d. The fuel consumptions are compared with projected data of the year of Phase 4 construction start, which is 2029.
e. The fuel consumptions are compared with projected data of the year of Phase 5 construction start, which is 2031.

Construction

During construction, the Proposed Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coatings. As indicated in **Table 3.4-5**, the maximum on-road and off-road fuel consumption during Proposed Project construction would be up to 21,761 gallons and 44,355 gallons (both during Phase 3), which would result in a nominal increase (0.0006 percent and 0.1465 percent, respectively) in on-road and off-road fuel use in the County. As such, Project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservation would occur during construction through compliance with state requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations Section 2485). Construction equipment would also be required to comply with the latest USEPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, since the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. 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. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual characteristics of the Proposed Project that would necessitate the use of construction equipment, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or state. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (**Criterion 5**).

Therefore, construction energy use would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature and a less than significant impact would result.

Operation

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States (**Criterion 4**). 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; as such, the Project would not result in more vehicle trips to and from the school during operations when compared to existing conditions. In addition, the Proposed Project would not modify primary site access locations and traffic patterns—two factors that could potentially result in an increase in average trip lengths. In addition, the Proposed Project would install additional bike racks at each building to accommodate at least 10 percent regular building occupants. As such, no increase to operational fuel consumption is anticipated, and no unusual features that would result in excessive long-term operational fuel consumption is anticipated (**Criterion 2** and **Criterion 6**). Therefore, fuel consumption associated with vehicle trips generated by the Proposed Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region and a less than significant impact would result.

Building Energy Demand

The CEC developed 2023 to 2035 forecasts for energy consumption and peak demand in support of the 2022 IEPR Update for each of the major electricity and natural gas planning areas and the state based on the economic and demographic growth projections. The CEC forecast baseline electricity consumption and natural gas growth at a rate of about 1.8 percent and 0.2 percent, respectively, annually through 2035. As shown in **Table 3.4-4**, operational energy consumption of the Proposed Project would represent approximately 0.0009 percent increase in electricity consumption and approximately 0.0005 percent increase in natural gas consumption over the current countywide usage, which would be substantially less than the CEC's forecasts and the current countywide usage. As discussed above, energy consumption from the existing uses on-site were not modeled or deducted from the Proposed Project's energy consumption as a conservative analysis. Therefore, the Proposed Project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the Proposed Project would consume energy during the same time periods as other institutions and would mostly consume energy during daytime. As a result, the

Proposed Project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

The Proposed Project is designed to comply with energy efficiency standards set forth by Title 24 and CALGreen requirements related to energy. Furthermore, the District would continue its existing and implement additional initiatives to improve energy conservation and management. These measures would decrease electricity and gas consumption. The Title 24 Building Energy Efficiency Standards are updated every three years and become more stringent at each update. As such, complying with the most recent Title 24 standards would ensure any structure renovated or built under the Proposed Project would be more energy efficient than existing buildings built under the earlier versions of the Title 24 standards (**Criterion 4**).

Furthermore, the electricity provider, SCE, is subject to California's RPS reflected in SB 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020, to 60 percent of total procurement by 2030, and to 100 percent of total procurement by 2045. Renewable energy is defined as energy that comes from resources that are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. It should be noted that all proposed buildings would have solar-compatible roofs. Further, according to the District's Energy Assessment Report, the Roosevelt Elementary school generates more on-site renewable energy than used (SMMUSD 2020). The increase in reliance of such energy resources further ensures that new development projects would not result in the waste of finite energy resources (**Criterion 5**).

Therefore, the Proposed Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during Project operation, or preempt future energy development or future energy conservation, and a less than significant impact would result.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

Threshold ENE-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The Proposed Project would comply with all applicable program missions and recommended strategies identified in the District's Sustainability Plan for reducing energy usage and implementing energy efficiency; refer to **Table 3.4-6, Districtwide Plan for Sustainability Consistency Analysis**. Specifically, the recommended strategies for the energy efficiency program address the findings and recommendations from the District's energy audits and program assessments and are aligned with the District's Strategic Energy Management Plan. They also include recommendations for education and training programs needed to maintain efficiency over time. As such, these strategies provide a comprehensive roadmap for energy conservation, efficiency, and renewable energy programs across the District.

Additionally, compliance with Title 24 and CALGreen standards would ensure the Proposed Project incorporates energy-efficient windows, insulation, lighting, and ventilation systems, as well as water-efficient fixtures in all new structures. Adherence to the Title 24 energy requirements will ensure conformance with the state's goal of promoting energy and lighting efficiency. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

TABLE 3.4-6
DISTRICTWIDE PLAN FOR SUSTAINABILITY CONSISTENCY ANALYSIS

Recommended Strategies	Proposed Project Consistency
ENERGY EFFICIENCY + RENEWABLES Program Mission: Minimize the use of energy resources, convert to clean, renewable energy sources, and redirect financial resources towards student learning and sustainability initiatives. **Goal for 2025:** • Reduce energy consumption by 25% compared to 2017-18 baseline. • Generate 30% of the District's electrical need from solar. **Goal for 2030:** • Reduce energy consumption by 30% compared to 2017-18 baseline. • Generate 35% of the District's electrical need from solar.	
Continue to install occupancy sensors in all classrooms and offices to allow lights to be shut off when unoccupied.	**Consistent**. All proposed indoor spaces on-site would install occupancy sensors. As such, the Project would be consistent with this strategy.
Establish lighting and equipment efficiency standards for all new equipment that meet or exceed Title 24 standards.	**Consistent**. The Proposed Project would be required to comply with the latest Title 24 and CALGreen Code. As such, the Project would be consistent with this strategy.
Install solar PV on the District sites included in the solar Phase 1 project scope.	**Consistent**. All proposed buildings would have solar-compatible roofs. As such, the Proposed Project would be consistent with this strategy.
Install Title 24 compliant or better HVAC units for District sites that require cooling.	**Consistent**. All proposed buildings would install the most recent Title 24 compliant or better HVAC units. As such, the Proposed Project would be consistent with this strategy.
Install wireless thermostats for new HVAC units to allow District to implement energy saving strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling.	**Consistent**. All proposed buildings would install Pelican Wireless thermostats, which would be compatible with any District-implemented energy management strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling. As such, the Proposed Project would be consistent with this strategy.
Install energy management systems (EMS) for remaining school sites (existing EMS at Santa Monica High School and Edison) to allow control at both the site and District level. Connect wireless thermostats to the EMS system.	**Consistent**. As discussed above, all proposed buildings would install Pelican Wireless thermostats, which would be compatible with any District-implemented energy management strategies, such as connection between wireless thermostats to the EMS. As such, the Proposed Project would be consistent with this strategy.

TABLE 3.4-6, CONTINUED

Recommended Strategies	Proposed Project Consistency
GREEN BUILDING + OPERATIONS Program Mission: Provide sustainable, healthy, and safe environments for the District community through the adoption of sustainable building design principals, construction methods, and operational practices that minimize environmental impact and maximize health. **Goal for 2025** • Adopt CA Green Building Standards Chapter 11, Title 24 (CALGreen) Nonresidential Tier 2 Voluntary Measures as mandatory and incorporate into the District's Sustainability Design Guidelines. • All new buildings and major renovations to consider WELL Certification Silver. **Goal for 2030** • All new buildings to be Zero Net Energy (ZNE); and 50% of existing buildings to be retrofitted to ZNE. • All new buildings and major renovations to achieve CHPS Verified Leader^{TM}.	
Collaborative for High Performance Schools (CHPS) Green Building Resolution Standards.	**Consistent**. According to the District, the Proposed Project would adhere to and exceed the most current CHPS Criteria by 25 percent. As such, the Proposed Project would be consistent with the recommended strategy.

Source: SMMUSD 2019.

<u>Mitigation Measures</u>

None required.

<u>Level of Significance After Mitigation</u>

3.4.6 CUMULATIVE IMPACT ANALYSIS

Table 3-1, **Cumulative Projects List**, identifies related projects and other cumulative development in the Proposed Project area determined as having the potential to interact with the Project to the extent that a significant cumulative effect may occur. The following discussions are included by topical area to determine whether a significant cumulative effect would occur.

<u>Energy Consumption and Plan Consistency</u>

Implementation of the Project and other cumulative projects could result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The geographic context for cumulative energy consumption impacts for electricity is countywide and relative to SCE's service areas. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Proposed Project in the context of countywide consumption. Future growth within the County is anticipated to increase the demand for electricity and transportation energy, as well as the need for energy infrastructure. The Proposed Project would nominally increase the County's electricity, natural gas, on-road construction diesel fuel consumption, and off-road construction fuel consumption by 0.0009, 0.0005, up to 0.0006, and up to 0.1465 percent, respectively; refer to **Table 3.4-4** and **Table 3.4-5**. The Proposed Project would not consume additional transportation fuel during operations compared to existing conditions. Additionally, per the RPS, the Proposed Project and cumulative projects identified in **Table 3-1** would use electricity provided by SCE that would be composed of 60 precent renewable energy by 2030 and 100 percent renewable energy by 2045. Furthermore, the Proposed Project and other cumulative projects in the vicinity would be subject to Title 24 and CALGreen standards, as well as strategies of the Districtwide Plan for Sustainability. Thus, the Proposed Project and related projects would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. As such, implementation of the Project and other cumulative projects would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and the Proposed Project's cumulatively considerable impacts would be less than significant.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

This page intentionally left blank.

3.5 GEOLOGY AND SOILS

This section of the EIR evaluates potential effects associated with paleontological resources in the Proposed Project area that may result from construction and/or operation of the Roosevelt Elementary School Campus Plan Project (Proposed Project). The following discussion addresses conditions of the affected environment related to paleontological resources; analyzes environmental impacts; and identifies measures to reduce or avoid adverse impacts anticipated from implementation of the Proposed Project, as applicable.

As identified in the Initial Study, the Proposed Project has limited potential to result in geologic and soils impacts. Therefore, only impacts related to paleontological resources are analyzed herein. The analysis herein is primarily based upon the *Geotechnical Exploration Report* prepared for the Proposed Project (Leighton Consulting, Inc. 2023),as well as the *Archaeological and Paleontological Resources Assessment for the McKinley Elementary School Campus Master Plan Project, City of Santa Monica, Los Angeles County, California (*Cogstone 2022) which was performed for the Santa Monica-Malibu Unified School District for McKinley Elementary School. As McKinley Elementary School lies approximately 1.3 miles to the northeast of Roosevelt Elementary School and is located within the same geologic unit of the Los Angeles Basin as Roosevelt Elementary School, the school is anticipated to exhibit similar paleontological conditions as the Roosevelt Elementary School campus. The paleontological study and relevant information from the report (including a records search of fossils within a 10-mile radius) are therefore incorporated herein by reference.

3.5.1 ENVIRONMENTAL SETTING

Regional Setting

The Proposed Project site is located in the Los Angeles Basin, which is bounded by the Santa Ana Mountains to the east, the Santa Monica Mountains to the north, and the San Joaquin Hills to the south. This basin is also defined as a sedimentary basin which began to develop in the early Miocene, approximately 23 million years ago. The basin transitioned to terrestrial deposition by the middle Pleistocene, approximately 1 million years ago.

The Los Angeles Basin is part of the coastal section of the northernmost Peninsular Range Geomorphic Province, which is located in the southwestern corner of California and is physically characterized by northwest-trending mountain ridges separated by sediment-floored valleys. Subparallel faults in the basin branch from the San Andreas Fault to create the local mountains and hills (Cogstone 2022).

Local Geologic Setting

Geology in the area of the Proposed Project is identified as middle to late Pleistocene (774,000 to 11,700 years ago) alluvial fan deposits and Holocene (less than 11,700 years ago) alluvial fan deposits. Previous development of the school resulted in various amounts of artificial fill to be present on-site (Cogstone 2022). The specific geologic units are summarized below.

Quaternary Old alluvial fan deposits, middle to late Pleistocene

Alluvial fan deposits are typically deposited along the outer slopes of valleys from nearby mountains via canyon mouths. Sediments of the alluvial fan deposits are characterized as slightly to moderately indurated silts to boulder conglomerates, with slightly to moderately dissected fan surfaces, and moderately to well-developed pedogenic soils (Cogstone 2022). The Pleistocene age deposits directly beneath the artificial fill materials generally consist of medium to dark brown, medium to very stiff, silty to sandy lean clay with gravel to a depth of 15 to 25 feet below ground surface (Leighton Consulting, Inc. 2023).

Alluvial fan deposits, Holocene

Similar to old alluvial fan deposits, Holocene alluvial fan deposits are also deposited along the outer slopes of valleys via nearby mountains. Sediments of the Holocene alluvial fan deposits consist of unconsolidated silt, sand, and gravel, with some boulders and cobbles (Cogstone 2022).

Undocumented Artificial fill, modern

In California, most artificial fill is less than 100 years old and is typically associated with past construction activities. The Proposed Project area has been previously developed and, as such, contains artificial fill from previous development activities (Leighton Consulting, Inc. 2021). Artificial fill materials were predominantly encountered to depths of approximately 2 to 5 feet below ground surface and characterized as brown to reddish brown silty clay, sandy clay, clayey sand with varying proportions of gravel (Leighton Consulting, Inc. 2023).

3.5.2 REGULATORY SETTING

Federal

There are no federal regulations directly applicable to paleontological resources at the Proposed Project site.

State

Public Resources Code

Public Resources Code Division 5, Chapter 1.7, section 5097.5, provides the requirements for paleontological resource management and states:

> A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

This statute prohibits the removal, without permission, of any paleontological site or feature from land under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Local agencies are also required to comply with this regulation for their own activities (e.g., construction, maintenance), along with permit actions (e.g., encroachment permits). This regulation also identifies removal of paleontological resources as a misdemeanor and requires mitigation of adverse impacts to paleontological resources from developments on public land (e.g., state, county, city, district).

<u>**California Code of Regulations**</u>

Title 14, Section 4307, of the California Code of Regulations states that no person shall destroy, disturb, mutilate, or remove earth, sand, gravel, oil, minerals, rocks, paleontological features, or features of caves.

Regional

<u>**Society for Vertebrate Paleontology Professional Standards**</u>

The Society for Vertebrate Paleontology (SVP) provides standard guidelines for professional practices for the assessment and survey, monitoring and mitigation, data and fossil recovery, sampling procedure, and specimen preparation, identification, analysis, and curation of paleontological resources. Most practicing professional paleontologists adhere to the SVP's guidelines and many California State regulatory agencies accept the SVP standard guidelines as a measure of professional practice.

Significant nonrenewable paleontological resources are defined by the SVP (2010) as:

> … fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

The SVP considers a geologic unit to be "sensitive" to adverse impacts if it is known to contain significant fossils and if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either directly or indirectly disturb, or destroy, fossil remains (such as excavations greater than 5 feet in depth). Therefore, the limits of a geologic unit, both areal and stratigraphic, define the scope of the paleontological potential (SVP 1995: 23).

Fossils contained within surficial sediments or bedrock are not observable or detectable until being exposed by erosion or human activity (e.g., excavation). Therefore, it is difficult for paleontologists to know the quality or quantity of fossils until natural erosion or human-caused exposure occurs. As a result, potential for fossils to be located on a particular site focuses on assessing the sensitivity of geologic units based on their known potential to harbor significant fossils or based on whether a geologic unit was deposited in a type of environment known to be favorable for fossil preservation.

<u>**Paleontological Sensitivity**</u>

The potential for a geologic unit to produce scientifically significant fossils defines paleontological sensitivity. Paleontological sensitivity is determined by rock type, past history of the geologic unit in producing significant fossils, and locations of previous fossils recorded in a particular geologic unit. Based on this method, paleontological sensitivity can be discerned from known fossil data collected from an entire geologic unit and not from a site-specific survey. The SVP identifies four categories of paleontological sensitivity (high, low, undetermined, no potential) for geologic units:

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcaniclastic formations (e. g., ashes or tephras), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.). Rock units which contain potentially datable organic remains older than late Holocene, including deposits associated with animal nests or middens, and rock units which may contain new vertebrate deposits, traces, or trackways are also classified as having high potential.

- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e.g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.

- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.

- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources (SVP 2010).

For geologic units with high potential, full-time monitoring is generally recommended during any project-related ground disturbance (SVP 2010). For geologic units with low potential, full-time monitoring is not generally required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist are recommended to be conducted to determine the palaeontologic potential of the geologic units on a project site.

Local

City of Santa Monica General Plan

The Santa Monica General Plan, Land Use and Circulation Element, includes the following policy relating to paleontological resources:

- **Goal HP1:** Preserve and protect historic resources in Santa Monica through the land use decision-making process.

- **Policy HP1.10.** Review proposed developments for potential impacts on unique archeological resources, paleontological resources, and incorporate appropriate mitigation measures to protect or document resources.

3.5.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines as amended contains analysis guidelines related to the assessment of geology and soils impacts. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold GEO-1: ***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.***

Threshold GEO-2: ***Result in substantial soil erosion or the loss of topsoil.***

Threshold GEO-3: ***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.***

Threshold GEO-4: ***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.***

Threshold GEO-5: ***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.***

Threshold GEO-6: ***Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiates that impacts associated with the following thresholds would have no impact or a less than significant impact:

Threshold GEO-1: ***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.

Threshold GEO-2: ***Result in substantial soil erosion or the loss of topsoil.***

Threshold GEO-3: ***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.***

Threshold GEO-4: ***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.***

Threshold GEO-5: ***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.***

3.5.4 PROJECT DESIGN FEATURES

There are no Proposed Project design features relating to the preservation of or potential impacts to paleontological resources.

3.5.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

This analysis evaluates anticipated changes in the physical environment resulting from the Proposed Project against the threshold of significance identified below, to determine if direct or indirect changes from existing conditions would constitute a potentially significant effect. Project changes are described and potential impacts, if any, are identified under the impact discussion. Where impacts would be considered potentially significant, mitigation measures are identified to reduce impacts to a less than significant level.

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy (Cogstone 2022). Vertebrate, invertebrate, and plant fossils are usually found in sedimentary and metasedimentary deposits (Caltrans 2024). The City of Santa Monica rests on surface deposits of younger and older Quaternary alluvium, derived primarily from the Santa Monica Mountains to the north. The younger (i.e., Holocene, past 11,700 years) alluvial deposits do not contain significant vertebrate fossils, but these deposits are underlain by older (i.e., Pleistocene, 11,700 to 1.6 million years) Quaternary deposits that contain significant vertebrate fossils at varying depths, beginning as shallow as 6 feet beneath the ground surface (Placeworks 2023).

For the purpose of this analysis, a paleontological resources assessment prepared for the McKinley Elementary School Campus Master Plan Project (Cogstone 2022) was reviewed because of its proximity to the Proposed Project site (approximately 1.3 mile distance), records search of fossils recovered within a 10-mile radius, similarity in geologic conditions (Los Angeles Basin), and because of the Proposed Project site's limited ground visibility due to existing hardscaping and landscaping, similar to the McKinley Elementary School campus. The paleontological resources assessment included an archival research, a pedestrian survey, a desktop review of geologic mapping and scientific literature, and a museum records search by the Los Angeles County Natural History Museum (NHMLAC). The methodology and results of these studies are summarized below.

Paleontological Record Search

A record search of the region surrounding the Proposed Project site was obtained from the NHMLAC, the University of California Museum of Paleontology database, and the PaleoBiology Database, and print sources were reviewed for fossil records (Cogstone 2022). The NHMLAC did not report any fossil localities at the Roosevelt Elementary School campus; however, as shown in **Table 3.5-1**, **Fossil Localities**, there are several known fossil localities located within the region surrounding Roosevelt Elementary School. The records search revealed that fossils previously recovered were encountered at a minimum 6-foot depth in deposits mapped as Pleistocene at the surface (Cogstone 2022).

TABLE 3.5-1
FOSSIL LOCALITIES

Common Name	Location	Formation Mapped at the Surface	Age	Depth
American Lion	South of Olympic Blvd. on Michigan Ave. east of Cloverfield Blvd., Santa Monica	Younger alluvial fan (Qya)	Pleistocene	6 feet
Ground sloth	Near Rose Ave. and Penmar Ave., Santa Monica	Younger alluvial fan (Qya)	Pleistocene	>11 feet
Horse				
Bison	Southeast corner of Airport Blvd. and Manchester Ave.	Older alluvium (Qoe)	Pleistocene	16 feet
Mammoth				
Hare				
Elephant	Los Angeles International Airport, Tom Bradley International Terminal	Older alluvium (Qoe)	Pleistocene	25 feet
Mastodon	Manchester Ave. and Airport Blvd., Westchester	Older alluvial fan (Qoa)	Pleistocene	13.5 feet
Horse	Culver City East	Younger alluvial fan (Qya)	Pleistocene	Unknown
Camel				

TABLE 3.5-1, CONTINUED

Common Name	Location	Formation Mapped at the Surface	Age	Depth
Camel	Outfall Sewer at Exposition Blvd., Culver City	Younger alluvial fan (Qya)	Pleistocene	Shallow but unknown
Mastodon	Outfall Sewer at Rodeo, Culver City	Younger alluvial fan (Qya)	Pleistocene	Shallow but unknown
Horse	Outfall Sewer Section 15, Sentous Ave. east of Ballona Creek, Culver City	Younger alluvial fan (Qya)	Pleistocene	Shallow but unknown
Horse	Outfall Sewer Section 10, Culver City	Younger alluvial fan (Qya)	Pleistocene	Shallow but unknown
Saber-toothed cat	Outfall Sewer saber-tooth, Culver City	Younger alluvial fan (Qya)	Pleistocene	Shallow but unknown
Antique bison	Outfall Sewer Trench 19, Culver City	Younger alluvial fan (Qya)	Late Pleistocene	Shallow but unknown
Horse	Outfall Sewer, Culver City	Younger alluvial fan (Qya)	Late Pleistocene	Shallow but unknown
Camel				
Deer				
Antique bison				
Bottae's pocket gopher				
Mammoth	Near Jacob St. and Sentney Ave., west of Ballona Creek Culver City	Younger alluvial fan (Qya)	Pleistocene	Unknown
Horse	Near Rose Ave. and Penmar Ave., Santa Monica	Younger alluvial fan (Qya)	Pleistocene	>11 feet

Source: Cogstone 2022

Paleontological Sensitivity

The Potential Fossil Yield Classification (PFYC) system provides a multi-level scale based on demonstrated yield of fossils. Based on the PFYC system, the probability for finding significant fossils can be predicted from previous records of fossils recovered from the geologic units in and/or adjacent to a study area. The geological setting and the number of known fossil localities is then used to determine the paleontological sensitivity of a particular area.

Using the PFYC system, geologic units are classified based on the abundance of vertebrate fossils or scientifically significant invertebrate or plant fossils and their sensitivity to adverse impacts in the known extent of a geological unit. Although significant fossils may occur in a particular geologic unit, a few widely scattered important fossils or localities do not automatically result in a higher PFYC value; rather, the relative abundance of fossil localities primarily determines the PFYC value (Cogstone 2022).

The area of the Santa Monica Plain where the Roosevelt Elementary School campus is located is mapped as being underlain by Quaternary old (Pleistocene age) alluvial fan deposits generally consisting of medium stiff to hard clays interbedded with medium dense to dense sands (Leighton Consulting, Inc. 2023). Specifically, a relatively thin mantle of artificial fill (Afu) materials, ranging from 2 to 5 feet in depth, was encountered within exploratory borings taken on the Proposed Project site. Native geologic units underlying the artificial fill materials consist of Quaternary old alluvial fan deposits (Qof), correlative to Quaternary old marine and partly non-marine sediments derived from the Santa Monica Mountains (Leighton Consulting, Inc. 2023). Alluvial fan deposits found on the Proposed Project site would be considered to have substantially similar conditions as alluvium soils underlying other lands within the surrounding geographic region that have been evaluated for the potential to support unknown paleontological resources (USDA 2024).

As shown in **Table 3.5-2**, older alluvium less than 5 feet below the surface can be assigned a low potential for fossils (PFYC 2) because of the lack of fossils in similar deposits found within the region; older alluvium sediments more than 5 feet below the surface can be assigned a moderate potential (PFYC 3). Young alluvium deposits less than 20 feet below the surface can be assigned a low potential for fossils (PFYC 2) because of the lack of fossils in similar deposits found within the region; young alluvium deposits more than 20 feet below the surface can be assigned a moderate potential for fossils (PFYC 3) based upon similar deposits at that depth found within the region which have produced fossils. Artificial fill in general is considered to have a very low potential for fossils (PFYC 1) (Cogstone 2022).

TABLE 3.5-2
PALEONTOLOGICAL SENSITIVITY SURVEY

Rock Unit	PFYC Rankings				
	5. Very High	4. High	3. Moderate	2. Low	1. Very Low
Older alluvium, middle to late Pleistocene			More than 5 feet deep	Less than 5 feet deep	
Young alluvium, late Pleistocene to Holocene			More than 20 feet deep	Less than 20 feet deep	
Artificial fill, modern					X

Source: Cogstone 2022

Threshold GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Known paleontological resources were not identified on the Proposed Project site based on paleontological records searches previously conducted within the surrounding region; however, as shown in **Table 3.5-1**, several known fossil localities have been identified within the regional vicinity (Cogstone 2022). As stated, prior records searches conducted for the area revealed that fossils previously recovered within the regional vicinity of the Proposed Project site were discovered at a minimum depth of 6 feet in Pleistocene deposits (Cogstone 2022).

Construction of the Proposed Project would require excavation and grading. Construction activities at the Roosevelt Elementary School campus would impact sediments with the potential to yield significant paleontological resources either at the surface or at depth, and therefore, would increase the potential to disturb unknown paleontological resources. If fossils are encountered during ground-disturbing activities, the fossils would risk being damaged or destroyed. Therefore, implementation of the Proposed Project could result in a significant impact to unique paleontological resources. Implementation of Mitigation Measure **MM GEO-1** would reduce such impacts to unknown paleontological resources to less than significant.

Mitigation Measure

MM GEO-1 Prior to the commencement of any on-site excavation or grading activities, the District shall retain a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP 2010) (Qualified Paleontologist). The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall be responsible for ensuring the employee training provisions are implemented during implementation of the Proposed Project, and shall report to the Proposed Project Site in the event potential paleontological resources are encountered.

A Paleontological Resources Management Plan (PRMP) shall be prepared by the Qualified Paleontologist that incorporates all available geologic data for the Project in order to determine the necessary level of effort for monitoring based on the planned rate of excavation and grading activities, the materials being excavated, and the depth of excavation. The PRMP establishes the ground rules for the entire paleontological resource mitigation program. The Qualified Paleontologist will implement the PRMP as the project paleontologist, program supervisor, and principal investigator. The PRMP shall incorporate the results of the paleontological resources assessments, geotechnical investigation, and the final engineering/grading plans for the project including pertinent geological and paleontological literature, geologic maps, and known fossil locality information. The PRMP shall include processes and procedures for paleontological monitoring, fossil salvaging (if needed), reporting, and curation (if needed). The PRMP shall also require the Qualified Paleontologist to prepare a report of the findings of the monitoring efforts after construction is completed. The PRMP shall also require the Qualified Paleontologist to obtain a curatorial arrangement with a qualified repository (e.g., Los Angeles County Natural History Museum) prior to construction if significant paleontological resources are discovered and require curation.

A paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials, shall work under the direction of the Qualified Paleontologist and shall be on-site during excavations into native sediments of older alluvium below a depth of 5 feet and native sediments of young alluvium below a depth of 20 feet. Drilling or pile driving activities, regardless of depth, have a low potential to produce fossils meeting significance criteria because any fossils brought up by the auger during drilling will not have information about formation, depth or context. The only instance in which such fossils will meet significance criteria is if the fossil is a species new to the region.

In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the Los Angeles County Natural History Museum.

A final Paleontological Monitoring and Data Recovery Report shall be completed that outlines the results of the monitoring program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

Level of Significance

Potential impacts to unknown paleontological resources on the Roosevelt Elementary School campus that could qualify as unique paleontological resources would be mitigated to less than significant through implementation of Mitigation Measure **MM GEO-1** which would require paleontological monitoring during excavations into native sediments of older alluvium below a depth of 5 feet and native sediments of young alluvium below a depth of 20 feet. Therefore, the Proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts to paleontological resources would be reduced to less than significant.

3.5.6 CUMULATIVE IMPACT ANALYSIS

Impacts of the Proposed Project would be cumulatively considerable if the Project, combined with related projects, resulted in significant cumulative impacts. However, the effects of the cumulative projects are not of a nature to cause cumulatively significant effects from geologic impacts, or on soils, because such impacts are site-specific and would only have the potential to combine with impacts of the Proposed Project if they occurred in the same location. Potential impacts to paleontological resources related to the Proposed Project would therefore be specific to the Roosevelt Elementary School campus and would not combine with other area development to result in a cumulative impact. Other development projects may be located in areas considered sensitive for paleontological resources. Such projects would require site-specific analysis for potential paleontological resource impacts, and would be required to implement mitigation similar to Mitigation Measure **MM GEO-1** to reduce potential impacts to less than significant levels. Compliance with state and local regulations would also be required of individual development projects considered in the cumulative analysis; refer to **Table 3-1**, **Cumulative Projects List**, and **Figure 3-1**, **Cumulative Projects**.

Mitigation Measure **MM GEO-1** would be implemented to reduce the potential for Proposed Project-related activities to contribute to cumulative impacts to area paleontological resources. With incorporation of the proposed mitigation, impacts would be reduced to less than significant, and the Proposed Project's contribution to cumulative paleontological resource impacts would be less than cumulatively considerable.

Mitigation Measure

Implement Mitigation Measure **MM GEO-1**.

Level of Significance

Less than significant with mitigation incorporated.

3.6 GREENHOUSE GAS EMISSIONS

This section addresses potential greenhouse gas (GHG) emissions impacts that may result from construction and/or operation of the Project. The following discussion addresses the existing conditions of the affected environment pertaining to GHG emissions, evaluates the Project's consistency with applicable goals and policies, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project, as applicable.

The analysis in this section is largely based on California Emissions Estimator Model (CalEEMod) output files (**Appendix C**), which are incorporated by reference herein.

3.6.1 ENVIRONMENTAL SETTING

Global Climate Change

Global climate change is the observed increase in the average temperature of Earth's atmosphere and oceans over an extended period. The term "climate change" is often used interchangeably with "global warming," but climate change is preferred because it conveys changes are happening in addition to rising temperatures (such as changing wind patterns, precipitation, and storms). The baseline against which these changes are measured originates from historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling, typically at an incremental rate over the course of thousands of years. However, scientists have observed acceleration in the rate of warming over the past 150 years.

Greenhouse Gas Emissions

The United Nations' Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric carbon dioxide (CO_2) concentrations is unequivocally due to human activities, which has led the climate to warm at an unprecedented rate in the last 2,000 years. Parts of the earth's atmosphere act as an insulating blanket, trapping sufficient solar energy to keep the global average temperature within a range suitable for human habitation. The "blanket" is a collection of atmospheric gases called GHG emissions because they trap heat similar to the effect of glass walls in a greenhouse. These gases, mainly water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), chlorofluorocarbons (CFCs), and sulfur hexafluoride (SF_6), all act as effective global insulators, reflecting infrared radiation back to the earth. Since the late 1700s, estimated concentrations of these gases in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity. Emissions resulting from human activities, such as producing electricity and driving internal combustion vehicles emit these gases in the atmosphere and are thereby contributing to an average increase in Earth's temperature.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood by scientists who study atmospheric chemistry that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration.

The most abundant GHGs are water vapor and CO_2, while the other GHGs are trace gases, but have greater ability to absorb and re-radiate longwave radiation. For this reason, and to gauge the potency of GHGs, scientists have established a global warming potential (GWP) for each GHG based on its ability to absorb and re-radiate longwave radiation, as described in the following:[1]

- *Water Vapor (H_2O)*. Although water vapor has not received the scrutiny of other GHGs, it is the primary contributor to the greenhouse effect. Natural processes, such as evaporation from oceans and rivers, and transpiration from plants, contribute 90 percent and 10 percent of the water vapor in our atmosphere, respectively. The primary human-related source of water vapor comes from fuel combustion in motor vehicles; however, it does not contribute a significant amount (less than 1 percent) to atmospheric concentrations of water vapor. The Intergovernmental Panel on Climate Change (IPCC) has not determined a GWP for water vapor.

- *Carbon Dioxide (CO_2)*. CO_2 is primarily generated by fossil fuel combustion in stationary and mobile sources. Due to the increased use of clean fuel by industrial facilities and mobile sources, CO_2 emissions from fossil fuel combustion decreased by a total of 1.9 percent between 1990 and 2021 (USEPA 2023). CO_2 is the most widely emitted GHG and is the reference gas (GWP of 1) for determining GWPs for other GHGs.

- *Methane* (CH_4). Methane is emitted from biogenic sources, incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The United States' top three methane sources are landfills, natural gas systems, and enteric fermentation. Methane is the primary component of natural gas, used for space and water heating, steam production, and power generation. The GWP of methane is 27.9.

- *Nitrous Oxide (N_2O)*. N_2O is produced by both natural and human-related sources. Primary human-related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. The GWP of N_2O is 273.

- *Hydrofluorocarbons (HFCs)*. HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phaseout of chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFC) gains momentum. The 100-year GWP of HFCs is as high as 12,400 (USEPA 2023).

- *Perfluorocarbons (PFCs)*. Perfluorocarbons are compounds consisting of carbon and fluorine and are primarily created as a byproduct of aluminum production and semiconductor manufacturing. Perfluorocarbons are potent GHGs with a GWP several thousand times that of CO_2, depending on the specific PFC. Another area of concern regarding PFCs is their long atmospheric lifetime (up to 50,000 years). The GWP of PFCs is as high as 11,100 (USEPA 2023).

[1] All global warming potentials (GWP) are given as 100-year GWP. Unless noted otherwise, all GWP were obtained from the Intergovernmental Panel on Climate Change.

- *Sulfur Hexafluoride*. Sulfur hexafluoride is a colorless, odorless, nontoxic, nonflammable gas. It is the most potent GHG that has been evaluated by the IPCC with a GWP of 23,500. However, its global warming contribution is not as high as the GWP would indicate due to its low mixing ratio compared to CO_2 (4 parts per trillion [ppt] in 1990 and 365 parts per million [ppm], respectively) (USEPA 2023).

In addition to the six major GHGs discussed above (excluding water vapor), many other compounds have the potential to contribute to the greenhouse effect. Some of these substances were previously identified as stratospheric ozone (O_3) depletors; therefore, their gradual phaseout is currently in effect. The following lists these compounds.

- *Hydrochlorofluorocarbons (HCFCs).* HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, all developed countries that adhere to that protocol are subject to a consumption cap and gradual phaseout of HCFCs. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year GWP of HCFCs ranges from 90 for HCFC-123 to 1,800 for HCFC-142b (IPCC 2021).

- *1,1,1 trichloroethane.* 1,1,1 trichloroethane or methyl chloroform is a solvent and degreasing agent commonly used by manufacturers. The GWP of methyl chloroform is 161 times that of CO_2 (IPCC 2021).

- *Chlorofluorocarbons (CFCs)*. CFCs are used as refrigerants, cleaning solvents, and aerosol spray propellants. CFCs were also part of the US Environmental Protection Agency's (USEPA) Final Rule (57 FR 3374) for the phaseout of ozone-depleting substances. Currently, CFCs have been replaced by HFCs in cooling systems and a variety of alternatives for cleaning solvents. Nevertheless, CFCs remain suspended in the atmosphere, contributing to the greenhouse effect. CFCs are potent GHGs with 100-year GWPs ranging from 3,550 for CFC 112a to 16,200 for CFC 13 (IPCC 2021).

3.6.2 REGULATORY FRAMEWORK

Federal

To date, no national standards have been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction specifically applicable to the Project. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007, among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel by 2022.

- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

Federal Clean Air Act and Vehicle Standards

The USEPA's authority to regulate GHG emissions stems from the US Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the court's ruling, the USEPA finalized an endangerment finding in December 2009. Based on scientific evidence, the EPA found that six GHGs (CO_2, methane, N_2O, HFCs, PFCs, and sulfur hexafluoride) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing act and the USEPA's assessment of the scientific evidence that form the basis for the USEPA's regulatory actions.

Federal Vehicle Standards

In response to the US Supreme Court ruling discussed above, the George W. Bush Administration issued Executive Order 13432 in 2007 directing the USEPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from ca rs and light-duty trucks for model year 2011. In 2010, the USEPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Barack Obama issued a memorandum directing the Department of Transportation, Department of Energy, USEPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017 to 2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017 to 2021, and the NHTSA intends to set standards for model years 2022 to 2025 in a future rulemaking. On January 12, 2017, the USEPA finalized its decision to maintain the current GHG emissions standards for model years 2022 to 2025 cars and light trucks.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014 to 2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the USEPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

In March 2021, the USEPA and NHTSA adopted the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. The SAFE Vehicles Rule sets tough but feasible fuel economy and CO_2 standards that increase 1.5 percent in stringency each year from model years 2021 through 2026. These standards apply to both passenger cars and light trucks and will continue the nation's progress toward energy independence and CO_2 reduction, while recognizing the realities of the marketplace and consumers' interest in buying vehicles that meet all of their diverse needs.

<u>Presidential Executive Order 13783</u>

Presidential Executive Order 13783, Promoting Energy Independence and Economic Growth (March 28, 2017), orders all federal agencies to apply cost-benefit analyses to regulations of GHG emissions and evaluations of the social cost of carbon, nitrous oxide, and methane.

State

Various statewide and local initiatives to reduce the state's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term.

<u>Executive Order S-1-07</u>

Executive Order S-1-07 proclaims that the transportation sector is the main source of GHG emissions in California, generating more than 40 percent of statewide emissions. It established a goal to reduce the carbon intensity of transportation fuels sold in California by at least 10 percent by 2020. This order also directed CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in Assembly Bill (AB) 32. CARB's 2017 Scoping Plan Update has identified the LCFS as a regulatory measure to reduce GHG emissions to meet the 2030 emissions target. On September 27, 2018, CARB approved a rulemaking package that amended the LCFS to relax the 2020 carbon intensity reduction from 10 percent to 7.5 percent and to require a carbon intensity reduction of 20 percent by 2030.

<u>Executive Order S-3-05</u>

Executive Order S-3-05 set forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The executive order directed the secretary of the California Environmental Protection Agency to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary also submits biannual reports to the governor and California legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts.

Executive Order S-13-08

Executive Order S-13-08 seeks to enhance the state's management of climate impacts, including sea level rise, increased temperatures, shifting precipitation, and extreme weather events, by facilitating the development of the state's first climate adaptation strategy. This executive order results in consistent guidance from experts on how to address climate change impacts in California.

Senate Bill 100 (SB 100)

SB 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, 60 percent by December 31, 2030, and 100 percent by December 31, 2045. The bill would require the California Public Utilities Commission (CPUC), CEC, California Air Resource Board (CARB), and all other state agencies to incorporate this policy into all relevant planning. In addition, SB 100 would require the CPUC, CEC, and CARB to utilize programs authorized under existing statutes to achieve this policy and, as part of a public process, issue a joint report to the legislature by January 1, 2021, and every four years thereafter, that includes specified information relating to the implementation of the policy.

Assembly Bill 1493

AB 1493 (also known as the Pavley Bill) required that CARB develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of GHG emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State." To meet the requirements of AB 1493, CARB approved amendments to the California Code of Regulations (CCR) in 2004 by adding GHG emissions standards to California's existing standards for motor vehicle emissions. Amendments to CCR Title 13, Sections 1900 and 1961 and adoption of CCR Title 13, Section 1961.1 require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty weight classes for passenger vehicles (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily to transport people), beginning with the 2009 model year. Emissions limits are reduced further in each model year through 2016. The near-term standards were intended to achieve a reduction of about 22 percent in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term standards were intended to achieve a reduction of about 30 percent.

California Global Warming Solutions Act (Assembly Bill 32)

California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, §§ 38500-38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020; it further specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 Scoping Plan

On December 11, 2008, CARB adopted its Scoping Plan, which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California will implement to reduce CO_2 equivalent (CO_2e) emissions by 174 million metric tons (MT), or approximately 30 percent, from the state's projected 2020 emissions level of 596 million $MTCO_2e$ under a business-as-usual (BAU) scenario.[2] This is a reduction of 42 million $MTCO_2e$, or almost 10 percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

CARB's Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each economic sector (e.g., transportation, electrical power, commercial and residential, industrial). CARB used three-year average emissions, by sector, for 2002–2004 to forecast emissions to 2020. The measures described in CARB's Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The 2014 Scoping Plan summarized recent science related to climate change, including anticipated impacts to California and the levels of GHG reduction necessary to likely avoid risking irreparable damage. It identified the actions California has already taken to reduce GHG emissions and focused on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The 2014 Scoping Plan update also looked beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, observing that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal." The Scoping Plan update did not establish or propose any specific post-2020 goals, but identified such goals adopted by other governments or recommended by various scientific and policy organizations. In December 2017, CARB approved the 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. This update focused on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels.

On December 15, 2022, CARB released the 2022 Scoping Plan for Achieving Carbon Neutrality, which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and

[2] "Business as usual" refers to emissions that would be expected to occur in the absence of GHG reductions. See http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2020 limit, CARB used the above as the "definition." It is broad enough to allow design features to be counted as reductions.

sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under the 2022 Scoping Plan, by 2045, California aims to cut GHG emissions to 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan. Specifically, this plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions to 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

Achieving the 2030 target under the updated Scoping Plan will also spur the transformation of the California economy and fix its course securely on achieving an 80 percent reduction in GHG emissions by 2050, consistent with the global consensus of the scale of reductions needed to stabilize atmospheric GHG concentrations at 450 ppm CO_2e and reduce the likelihood of catastrophic climate change. Currently, global levels are at just above 400 ppm.

<u>Amendments to California Global Warming Solutions Act of 2006: Emission Limits (Senate Bill 32 and Assembly Bill 197)</u>

Signed into law on September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. SB 32 was passed alongside AB 197, which was intended to ensure CARB is more responsive to the legislature. AB 197 also added two members of the legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

Other California Legislation Relating to Climate Change

Table 3.6-2, California State Climate Change Legislation, provides a brief overview of other California legislation relating to climate change that may affect GHG emissions associated with the Proposed Project.

TABLE 3.6-2
CALIFORNIA CLIMATE CHANGE LEGISLATION

Legislation	Description
Renewables Portfolio Standard (Senate Bill X1-2 & Senate Bill 350)	California's Renewables Portfolio Standard (RPS) was implemented in 2002 by SB 1078 with the initial requirement that 20 percent of electricity retail sales must be served by renewable resources by 2017. The program was accelerated in 2015 with SB 350, which mandated a 50 percent RPS by 2030. SB 350 included interim annual RPS targets with three-year compliance periods and required 65 percent of RPS procurement to be derived from long-term contracts of 10 or more years. In 2018, SB 100 was signed into law, which increased the RPS to 60 percent by 2030 and required all the state's electricity to come from carbon-free resources by 2045.
Senate Bill 375[a]	SB 375 (codified in the Government Code and the Public Resources Code) took effect in 2008 and provides a new planning process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 requires metropolitan planning organizations to incorporate a sustainable communities strategy in their regional transportation plans that will achieve GHG emissions reduction targets by reducing vehicle miles traveled from light-duty vehicles through the development of more compact, complete, and efficient communities.
California Building Energy Efficiency Standards	In general, the California Building Energy Efficiency Standards require the design of building shells and building components to conserve energy. The 2022 Title 24 became effective on January 1, 2023. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards. Energy-efficient buildings require less electricity, and increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.
California Green Building Standards	The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code went into effect January 1, 2023.

a. Senate Bill 375 is codified at Government Code sections 65080, 65400, 65583, 65584.01, 65584.02, 65584.04, 65587, 65588, 14522.1, 14522.2, and 65080.01, as well as at Public Resources Code sections 21061.3 and 21159.28 and Chapter 4.2.

Regional

Southern California Association of Governments (SCAG)

On September 3, 2020, SCAG adopted the *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020–2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs emissions from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specifically, these strategies are:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the state-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center-focused placemaking, and focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

The most recent 2024-2050 RTP/SCS was adopted by SCAG's Regional Council in April 2024. The 2024-2050 RTP/SCS sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures, and policies, will reduce GHG emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the CARB. In addition, the 2024-2050 RTP/SCS is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. While SCAG has adopted the 2024-2050 RTP/SCS, CARB has not yet certified it or approved SCAG's GHG emissions reduction calculations.

Local

City of Santa Monica

The construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan. Per Government Code section 53094At the time this EIR will be considered for certification, the SMMUSD School Board is expected to pass a resolution to exempt the Proposed Project from the City of Santa Monica General Plan and zoning ordinance provisions, as well as the Sustainable City Plan (Santa Monica 2014).

City of Santa Monica Land Use and Circulation Element

The City's Land Use and Circulation Element (LUCE) is intended to achieve a sustainable and integrated system of land use and transportation in Santa Monica within the larger context of the greater Los Angeles metropolitan area. An important principle of the LUCE is to create a more sustainable Santa Monica by providing the framework to achieve the GHG reduction goals of the Sustainable City Plan. The LUCE addresses GHG emissions through its land use and transportation decisions such as focusing new land uses near transit, creating complete neighborhoods, supporting infill mixed-use projects, and providing affordable and diverse housing near jobs and transit. The LUCE includes a variety of strategies to reduce GHG emissions, energy use, water use, and solid waste generation. The following are selected LUCE sustainability goals and policies that are related to GHG emissions. However, as a state-owned facility, as are all public schools in California, construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan or Article 8 of the Santa Monica Municipal Code. As such, the analysis would be for informational purposes only.

- **Goal LU4:** Complete Sustainable Neighborhoods. Create complete neighborhoods that exemplify sustainable living practices with open spaces, green connections, diverse housing, local employment, and local-serving businesses that meet the daily needs of residents and reduce vehicle trips and GHG emissions.
    - **Policy LU4.6:** Open Space. Provide open space and green connections near residences that are part of an expanding and comprehensive system of passive and active open space and complete street design emphasizing inter-connectivity, recreation, and gathering spaces.
- **Goal S2:** Reduce GHG emissions from land use and transportation decisions.
    - **Policy S2.1:** Implement the VMT (vehicle miles traveled) reducing policies of the Land Use and Circulation Element of the General Plan including, but not limited to: focusing new growth in higher density, mixed use, transit-oriented districts; focusing new growth along existing corridors and nodes; creating complete, walkable neighborhoods with goods and services within walking distance of most homes; and implementing and supporting a wide range of pedestrian, bicycle and transit improvements in the City.
- **Goal S3:** Reduce overall energy use in the City.
    - **Policy S3.1:** Actively strive to implement the City's "zero net" electricity consumption goal by 2020 through a wide variety of programs and measures, including the generation of renewable energy in the city and energy efficiency measures.
- **Goal S5:** Improve the environmental performance of buildings.
    - **Policy S5.1:** Continue to maintain a Building Code and prescriptive compliance options that meet or exceed state requirements for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve net zero energy buildings by 2020 for low-rise residential buildings and 2030 for commercial buildings and achieve a LEED-equivalent local building code by 2020.
    - **Policy S5.8:** Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks.
- **Goal S6:** Promote water conservation and increase the use of reclaimed and recycled water.
    - **Policy S6.3:** Implement landscape water conservation requirements for new construction projects.

Sustainable City Plan

The City of Santa Monica's Sustainable City Plan was originally adopted on September 20, 1994. The most recent update was adopted in 2022. The Sustainable City Plan declares that the City's decision-making process is guided by the mandate to maximize environmental benefits and reduce or eliminate negative environmental impacts. The Sustainable City Plan uses the "power of community to enhance our resources, prevent harm to the natural environment and human health, and benefit the social and economic well-being of the community for the sake of current and future generations." The City must regularly evaluate whether its plans, laws, and programs are sufficient to meet and explore all means of addressing the growing environmental crisis.

- **Resource Conservation Goal 1**: Significantly decrease overall community consumption, specifically the consumption of non-local, non-renewable, non-recyclable and nonrecycled materials, water, energy, and fuels.

- **Transportation Goal 2**: Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.

- **Open Space and Land Use Goal 2**: Implement land use and transportation planning and policies to create compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of existing and future public transit systems.

City of Santa Monica Climate Action and Adaptation Plan

The City's CAAP builds off of its success and legacy as a sustainable community to move closer to carbon neutrality by establishing an interim goal of reducing carbon emissions 80 percent below 1990 levels by 2030. The CAAP is the product of collaboration and engagement with the public, businesses, stakeholder groups, subject matter experts from academia, industry, and interdepartmental staff representatives. The CAAP focuses on eight objectives in three sectors to reduce emissions: Zero Net Carbon Building, Zero Waste, and Sustainable Mobility. The CAAP also lays out a framework for increasing Santa Monica's resilience to climate change through four sectors: Climate Ready Community, Water Self-Sufficiency, Coastal Flooding Preparedness, and Low Carbon Food & Ecosystems.

The CAAP is not an element of the City's General Plan or a regulatory document for the purposes of streamlining the California Environmental Quality Act (CEQA) process. As such, the CAAP was not used for consistency analysis.

Santa Monica-Malibu Unified School District Districtwide Plan for Sustainability

The Districtwide Plan for Sustainability (Sustainability Plan) provides a strategic roadmap for: formalizing and uniting the District's many existing sustainability initiatives; incorporating sustainability into Education Services and all aspects of student learning; and integrating climate protection, resource efficiency, waste management, and other sustainability practices into District operations. The Sustainability Plan is organized into eight sustainability focus areas: climate; education and engagement; energy efficiency and renewables; water' solid waste; transportation; food, nutrition, and wellness; and green building and operations. The Sustainability Plan establishes a framework for assessment and progress on each of these focus areas by documenting baseline conditions, establishing key goals and performance indicators, highlighting current initiatives and best practices, recommending improvement strategies, and anticipating project costs and funding mechanisms.

3.6.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines as amended contains analysis guidelines related to the assessment of GHG emissions. A project would result in a significant impact if it would:

Threshold GHG-1: ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.***

Threshold GHG-2: ***Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses.***

Amendments to CEQA Guidelines section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions and gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. This section recommends the following factors to be considered in the determination of significance:

- The extent to which a project may increase or reduce GHG emissions compared to the existing environment;
- Whether the project exceeds an applicable significance threshold; and
- The extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHGs.

The amendments do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies or suggested by other experts, so long as any threshold chosen is supported by substantial evidence (CEQA Guidelines, §15064.7[c]). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and therefore GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analyses (CEQA Guidelines, §15064[h][3]). A project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project.

3.6.4 PROJECT DESIGN FEATURES

There are no Project design features for GHG.

3.6.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

GHG impacts were assessed quantitively using CalEEMod, version 2022.1. CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The City and the District have not adopted a numerical significance threshold for assessing impacts related to GHG emissions; however, the South Coast Air Quality Management District (SCAQMD) released draft guidance regarding interim CEQA GHG significance thresholds in 2008. For the purposes of this analysis, the SCAQMD's proposed threshold of 3,000 $MTCO_2$ per year was used to determine the Project's impacts related to GHG emissions in combination with GHG plan consistency analysis. The methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation is the basis for determining the significance of the Project's GHG-related impacts on the environment.

Impact GHG-1: ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.***

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.

Project-Related Sources of Greenhouse Gas Emissions

Direct Project-related GHG emissions include emissions from construction activities, area sources, mobile sources, and refrigerants, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. As the Project proposes to upgrade the school buildings by demolishing and construction new buildings and renovating the existing structures without increasing enrollment, there would be no increase in mobile sources emissions over existing conditions during operation. As a conservative analysis, emissions from sources other than mobile of the operation of existing uses on-site were not modeled or deducted from Project-generated emissions. CalEEMod was used to determine direct and indirect GHG emissions. **Table 3.6-3**, **Estimated Greenhouse Gas Emissions**, presents the approximate quantity of annual GHG emissions generated by the Project.

TABLE 3.6-3
ESTIMATED GREENHOUSE GAS EMISSIONS

Source	CO_2	Methane	N_2O	Refrigerants	CO_2e
	Metric Tons/Year[a]				
Direct Emissions					
Construction (total of 3,985 $MTCO_2$, amortized over 30 years)	131.40	<0.01	<0.01	0.05	132.83
Area Source	2.69	<0.01	<0.01	0.00	2.70
Mobile Source[b]	0.00	0.00	0.00	0.00	0.00
Refrigerants	0.00	0.00	0.00	0.04	0.04
Total Direct Emissions	*134.09*	*0.01*	*0.01*	*0.09*	*135.57*
Indirect Emissions					
Energy	230.00	0.02	<0.01	0.00	231.00
Solid Waste	7.73	0.77	0.00	0.00	27.00
Water Demand	4.91	0.06	<0.01	0.00	***6.94***
Total Indirect Emissions	*242.64*	*0.85*	*0.01*	*0.00*	*264.94*
Total Project-Related Emissions	***400.51 $MTCO_2$/Year***				
SCAQMD Interim Threshold	***3,000 $MTCO_2$/Year***				
Exceed Threshold?	***No***				

Notes: Refer to Appendix C for assumptions used in this analysis.

a. Emissions calculated using California Emissions Estimator Model Version 2022.1 (CalEEMod) computer model. Totals may be slightly off due to rounding.
b. The Proposed Project would not result in additional student enrollment. As such, no increased emissions from mobile sourced would result.

Direct Project-Related Sources of Greenhouse Gas Emissions

Construction Emissions

Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions. As shown in **Table 3.6-3**, the Proposed Project would result in 132.83 $MTCO_2e$ per year construction emissions when amortized over 30 years (or a total of 3,985 $MTCO_2e$ in 30 years).

Area Source

Area source emissions were calculated using CalEEMod and Project-specific land use data. Project-related area sources include natural gas consumption for space heating and exhaust emissions from landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain landscaping. The Project would directly result in 2.70 $MTCO_2e$ per year from area source emissions; refer to **Table 3.6-3**.

Mobile Source

As the Project would not change enrollment of the school, there would be no increase in mobile sources emissions over existing conditions during operation. As shown in **Table 3.6-3**, the Project would not directly result in mobile source GHG emissions over the existing conditions.

Refrigerants

Refrigerants are substances used in equipment for air conditioning and refrigeration. Most of the refrigerants used today are HFCs or blends thereof, which can have high GWP values. All equipment that uses refrigerants has a charge size (i.e., quantity of refrigerant the equipment contains), and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime, and then derives average annual emissions from the lifetime estimate. The Proposed Project would result in 0.04 $MTCO_2e$ per year of GHG emissions from refrigerants; refer **Table 3.6-3**.

Indirect Project-Related Source of Greenhouse Gases

Energy Consumption

Energy consumption emissions were calculated using CalEEMod and Project-specific land use data. Southern California Edison and Southern California Gas Company would provide electricity and natural gas, respectively, to the Project site. The Project would indirectly result in 230.00 $MTCO_2e$ per year due to energy consumption; refer to **Table 3.6-3**.

Solid Waste

Solid waste associated with operations of the Proposed Project would result in 27.00 $MTCO_2e$ per year; refer to **Table 3.6-3**.

Water Demand

The Project operations would result in a demand of approximately 2.97 million gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 6.94 $MTCO_2e$ per year; refer to **Table 3.6-3**.

Total Project-Related Sources of Greenhouse Gases

As shown in **Table 3.6-3,** GHG emissions resulting from both construction and operation of the Proposed Project would result in approximately 400.51 $MTCO_2e$ annually. Therefore, Project GHG emissions would not exceed the SCAQMD interim threshold of 3,000 $MTCO_2$ per year, and impacts would be less than significant. The Proposed Project would implement sustainable design features that would comply with Title 24 energy efficiency standards and CALGreen. Design features would include the purchase of Energy Star–rated equipment, installation of energy-efficient lighting, water efficiency through usage of native and other drought-tolerant plants, efficient irrigation systems, and water-conserving interior fixtures beyond those required by code. Additionally, the Project would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions; refer to Impact GHG-2 below. Therefore, the Proposed Project would result in a less than significant impact.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The following discussion focuses on the Project's consistency with the City's General Plan LUCE, SCAG's 2020-2045 RTP/SCS, and CARB's 2022 Scoping Plan. The District's Sustainability Plan also discusses the City's goals and policies in regard to GHG emissions. As the Sustainability Plan focuses on energy, a detailed analysis of the Proposed Project's consistency with the Sustainability Plan's goals and policies has been included in **Section 3.4**, **Energy**.

Consistency with General Plan Land Use and Circulation Element and Sustainable City Plan

The Proposed Project would support the City's GHG emissions reduction goals and policies established in the Sustainable City Plan and the General Plan LUCE. The Proposed Project includes sustainable measures intended to reduce overall GHG impacts. **Table 3.6-4**, **Sustainable City Plan and General Plan LUCE Consistency Summary,** discusses the Proposed Project's consistency with applicable GHG reduction policies in these plans. The Proposed Project would comply with LUCE goals by expanding open spaces (i.e., quads, and green space for outdoor activities). The Sustainable City Plan implemented programs and policies developed to support the achievement of targeted reductions in GHG emissions. As depicted in **Table 3.6-4**, the Proposed Project would help fulfill these programs and policies by diverting construction/demolition material from landfills, implementing design features beyond Title 24 energy efficiency standards, complying with CALGreen, and providing new bicycle/pedestrian pathways along with new bicycle racks. The LUCE is focused on creating a more sustainable Santa Monica by providing the framework to achieve the GHG emissions reduction goals of the Sustainable City Plan. The environmental performance of buildings and water conservation would be achieved by implementing design features compliant with Title 24 energy efficiency standards; refer to **Table 3.6-4**. Overall energy use during the Proposed Project's operation would thereby be reduced due to the Proposed Project's design features. As such, the Proposed Project would be consistent with both the Sustainable City Plan and General Plan LUCE.

TABLE 3.6-4
SUSTAINABLE CITY PLAN AND GENERAL PLAN LUCE CONSISTENCY SUMMARY

Policy	Relationship to Project
Sustainable City Plan	
Resource Conservation Goal 1: Significantly decrease overall community consumption, specifically the consumption of non-local, nonrenewable, non-recyclable and non-recycled materials, water, energy, and fuels.	**Consistent**. 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. In addition, the Proposed Project would implement sustainable design features that would comply with the latest Title 24 energy efficiency standards and CALGreen. This would include the purchase of Energy Star–rated equipment, installation of energy-efficient lighting, water efficiency through usage of native and other drought-tolerant plants, efficient irrigation systems, and water–conserving interior fixtures required by code. As such, the Proposed Project would be consistent with the goal.
Transportation Goal 2 Facilitate a reduction in automobile dependency in favor of affordable alternative, sustainable modes of travel.	**Consistent**. The Proposed Project would not introduce a new land use or increase enrollments that would generate additional trips over existing conditions. Furthermore, the Proposed Project would add one more drop-off location, which would shorten drop-off trip distance and indirectly encourage alternative modes of travel. As such, the Proposed Project would not conflict with the goal.
Open Space and Land Use Goal 2 Implement land use and transportation planning and policies to create compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of existing and future public transit systems.	**Consistent**. The Proposed Project would be accessible by public transit and is within walking distance from the surrounding neighborhoods. The Project site would be surrounded by sidewalk on all sides and would provide bicycle parking on-site to encourage walking and bicycling. As such, the Proposed Project would be consistent with the goal.
LUCE	
Goal LU4 Complete Sustainable Neighborhoods. Create complete neighborhoods that exemplify sustainable living practices with open spaces, green connections, diverse housing, local employment, and local-serving businesses that meet the daily needs of residents and reduce vehicle trips and GHG emissions.	**Consistent**. The Proposed Project would create new green spaces for outdoor learning and play in areas that are currently paved or part of the building footprint. As such, the Proposed Project would be consistent with the goal.
Goal S2 Reduce GHG emissions from land use and transportation decisions.	**Consistent**. The Proposed Project would not introduce a new land use or generate new additional trips over existing conditions. As discussed above, the Project would include features encouraging alternative modes of travel, and thus would reduce mobile source GHG emissions. As such, the Proposed Project would not conflict with this goal.

TABLE 3.6-4, CONTINUED

Policy	Relationship to Project
Goal S3 Reduce overall energy use in the City.	**Consistent**. The Proposed Project involves demolition of existing buildings and construction or renovation of new buildings. The Proposed Project would comply with the latest Title 24 and CALGreen Code. The new standards would increase energy efficiency over existing conditions, including higher ventilation, insulation, and lighting standards. As such, the Proposed Project would be consistent with the goal.
Goal S5 Improve the environmental performance of buildings.	**Consistent**. As discussed above, the Proposed Project would be compliant with the latest Title 24 and CALGreen code, which would create improved environmental performance over existing buildings. As such, the Proposed Project would be consistent with the goal.
Goal S6 Promote water conservation and increase the use of reclaimed and recycled water.	**Consistent**. The Proposed Project would comply with standards set forth by Title 24, the Appliance Efficiency Regulation, and CALGreen requirements related to water conservation. Additionally, the Proposed Project would install water-efficient irrigation systems and incorporate water-reducing features and fixtures into the buildings. As such the Proposed Project would be consistent with the goal.

Consistency with the 2022 Scoping Plan

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. **Table 3.6-5**, **Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors** shows an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Proposed Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

TABLE 3.6-5
CONSISTENCY WITH THE 2022 SCOPING PLAN: AB 32 GHG INVENTORY SECTORS

Actions and Strategies	Project Consistency Analysis
Smart Growth/Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent**. As the Proposed Project would not increase enrollment, it would not increase trips over existing conditions. As discussed above, the Project would include features encouraging alternative modes of travel, and thus would reduce VMT. Therefore, the Project would not conflict with this action.
New Residential and Commercial Buildings	
All electric appliances beginning in 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**Consistent**. The Proposed Project is expected to use natural gas heating and/or cooking on-site. The City of Santa Monica has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if adopted, the Proposed Project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. Furthermore, the Proposed Project would install high efficiency lighting and appliances. As such, the Proposed Project would be consistent with this action.
Construction Equipment	
Achieve 25% of energy demand electrified by 2030 and 75% electrified by 2045	**Consistent**. The City of Santa Monica has not adopted an ordinance or program requiring electricity-powered construction equipment. However, if adopted, the Proposed Project would comply with the applicable goals or policies requiring the use of electric construction equipment in the future. As such, the Proposed Project would be consistent with this action.

TABLE 3.6-5, CONTINUED

Actions and Strategies	Project Consistency Analysis
Non-Combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	**Consistent**. SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law establishes an additional target that not less than 20 percent of currently disposed edible food be recovered for human consumption by 2025. The District currently complies with federal, state, and local statutes and regulations related to solid waste. As such, the Proposed Project would be consistent with this action.

Source: CARB 2022.

Consistency with the SCAG RTP/SCS (2020-2045 and 2024-2050)

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The 2020-2045 RTP/SCS is forecast to help California reach its GHG emissions reduction goals by reducing GHG emissions from passenger cars to 8 percent below 2005 levels by 2020 and 19 percent by 2035, in accordance with the most recent CARB targets adopted in March 2018. Five key SCS strategies are included in the 2020-2045 RTP/SCS to help the region meet its regional VMT and GHG reduction goals, as required by the state. **Table 3.6-6**, **Consistency with the 2020-2045 RTP/SCS** shows the Proposed Project's consistency with these five strategies. As shown therein, the Proposed Project would be consistent with the GHG emissions reduction strategies contained in the 2020-2045 RTP/SCS.

As mentioned above, the latest 2024-2050 RTP/SCS was adopted on April 4, 2024. However, CARB concluded that the technical methodology SCAG used to quantify the GHG emission reductions for the 2024-2050 RTP/SCS does not operate accurately (CARB 2023d). SCAG is currently working on updating the technical methodology and resubmitting for CARB's review. Until CARB approves the methodology, the 2024-2050 RTP/SCS is not a fully adopted document, especially from the GHG reduction perspective of the proposed strategies. As such, the consistency analysis relies upon the 2020-2045 RTP/SCS.

TABLE 3.6-6
CONSISTENCY WITH THE 2020-2045 RTP/SCS

Reduce Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	Center Focused Placemaking, Priority Growth Areas, Job Centers, High Quality Transit Areas, Transit Priority Areas, Neighborhood Mobility Areas, Livable Corridors, Spheres of Influence, Green Region, Urban Greening	**Consistent**. The Proposed Project proposes to remove and demolish six buildings and twelve portables, construct five new buildings and one building addition, and renovate three buildings and outdoor area on the existing school campus. The Proposed Project would promote redevelopment of underperforming outmoded nonresidential uses. As such, the Proposed Project would be consistent with this reduction strategy.
Promote Diverse Housing Choices		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	Priority Growth Areas, Job Centers, High Quality Transit Areas, Neighborhood Mobility Areas, Transit Priority Areas, Livable Corridors, Green Region, Urban Greening	**Not applicable**. The Proposed project would not propose any residential development. As such, this action is not applicable to the Proposed Project.

TABLE 3.6-6, CONTINUED

Reduce Strategy	Applicable Land Use Tools	Project Consistency Analysis
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	High Quality Transit Areas, Transit Priority Areas, Neighborhood Mobility Areas, Livable Corridors	**Consistent**. The Proposed Project would be required to comply with all applicable 2022 Title 24 and CALGreen building codes at the time of construction. The new buildings would be solar compatible and incorporate the latest low emission technologies as required by 2022 Title 24 and CALGreen building codes. Therefore, proposed development within the Proposed Project would leverage technology innovations and help the City, County, and state meet GHG emissions reduction goals. The Proposed Project would be consistent with this reduction strategy.
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities • (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	Center Focused Placemaking, Priority Growth Areas, Job Centers, High Quality Transit Areas, Transit Priority Areas, Neighborhood Mobility Areas, Livable Corridors, Spheres of Influence, Green Region, Urban Greening	**Not Applicable**. This reduction strategy is directed at regional and local agencies, and not at individual development projects. However, the Proposed Project would support sustainability policies. The Proposed Project would implement sustainable design features in accordance with the 2022 Title 24 and CALGreen. Sustainable design features include energy-efficient appliances, water and space heating/cooling equipment, building insulation and roofing, and lighting. Thus, the Proposed Project would be consistent with this reduction strategy.

TABLE 3.6-6, CONTINUED

Reduce Strategy	Applicable Land Use Tools	Project Consistency Analysis
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	Green Region, Urban Greening, Greenbelts and Community Separators	**Consistent**. The Proposed Project involves redevelopment of an existing school and would therefore not interfere with regional wildlife connectivity or concert agricultural land. The Proposed Project would be required to comply with CALGreen Code and 2022 Title 24 standards, which would help reduce energy consumption and reduce GHG emissions. Thus, the Proposed Project would support efficient development that reduces energy consumption and GHG emissions. The Proposed Project would be consistent with this reduction strategy.

Source: SCAG 2020.

As discussed above, the Proposed Project would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing emissions of GHGs. A less than significant impact would occur.

Mitigation Measures

None required.

Level of Significance After Mitigation

Less than significant.

3.6.6 CUMULATIVE IMPACT ANALYSIS

Proposed Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under Impact GHG-1 and Impact GHG-2 are not Proposed Project-specific impacts but are the Proposed Project's contribution to the cumulative impact of climate change. Implementation of the Proposed Project would result in a nominal increase in GHG emissions. Thus, the Project's GHG emissions and contribution to global climate change impacts are not considered cumulatively considerable and therefore are less than significant.

Mitigation Measures

None required.

Level of Significance After Mitigation

Cumulative impacts related to Greenhouse Gas Emissions would be less than significant without mitigation.

This page intentionally left blank.

3.7 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates potential effects associated with hazards and hazardous materials that may result from construction and/or operation of the Proposed Project. The analysis discusses conditions of the affected environment related to hazards and hazardous materials; identifies and analyzes environmental impacts; and recommends measures to reduce or avoid adverse impacts anticipated from Proposed Project implementation, as applicable.

The analysis of hazards and hazardous materials associated with construction and operation of the Proposed Project is based, in part, on the Phase I Environmental Site Assessment (ESA) prepared by NV5 Alta Environmental in 2023 for the Project site (**Appendix E**). The Phase I ESA includes a reconnaissance survey of the Proposed Project site, review of information and data on historical use of the site, and record searches of regulatory databases for hazardous sites. The Phase I ESA was prepared to American Standard of Materials (ASTM) Standard Practice for ESAs (ASTM E 1527-13) requirements for assessing the presence or potential presence of aboveground and subsurface hazardous materials at the Proposed Project site.

3.7.1 ENVIRONMENTAL SETTING

The subject site currently supports the Roosevelt Elementary School which is generally comprised of classroom buildings, paved surface parking, temporary classroom structures, and playground area. Prior to 1918, the site was undeveloped. The site was originally developed for residential use between 1918 and 1928, with the elementary school first developed in the mid-1930s and additional development occurring in the early 1940s. The school was expanded with additional classroom expansion occurring during the 1990's, bringing the campus into its current configuration (NV5 Alta Environmental 2023 [**Appendix E**]; Historic Resources Group 2022 [**Appendix B.1**]).

The 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.

Hazardous Materials and Waste Defined

Under Title 22 of the California Code of Regulations (CCR), the term *hazardous substance* refers to both hazardous materials and hazardous wastes, and both are classified according to four properties: toxicity, ignitability, corrosiveness, and reactivity (CCR Title 22, Chapter 11, Article 3). A hazardous material is defined as a substance or waste that, because of its physical, chemical, or other characteristics, may pose a risk of endangering human health or safety or of degrading the environment (Health and Safety Code, § 25260). Hazardous materials can be toxic, corrosive, flammable, explosive, reactive, an irritant, or a strong sensitizer and include certain infectious agents, radiological materials, oxides, oil, used oil, petroleum products, and industrial solid waste substances. They are used in almost every manufacturing operation and by retailers, service industries, and homeowners. Hazardous material incidents may occur as the result of natural disasters, human error, and/or accident.

Public health is potentially at risk whenever hazardous materials are or will be used. It is necessary to differentiate between the hazard of these materials and the acceptability of the risk they pose to human health and the environment. A hazard is any situation that has the potential to cause damage to human health or the environment. The risk to health and public safety is determined by the probability of exposure, in addition to the inherent toxicity of a material.

Factors that can influence the health effects when human beings are exposed to hazardous materials include the dose the person is exposed to, the frequency of exposure, the duration of exposure, the exposure pathway (route by which a chemical enters a person's body), and the individual's unique biological susceptibility.

Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been discarded, discharged, spilled, or contaminated or are being stored until they can be disposed of properly (CCR Title 22, chapter 11, article 2, § 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific CCR Title 22 criteria. While hazardous substances are regulated by multiple agencies, as described in the Regulatory Framework subsection below, cleanup requirements of hazardous wastes are determined on a case-by-case basis according to the agency with lead jurisdiction.

Environmental Database List Search

The Phase I ESA included an environmental database search for facilities listed by regulatory agencies as potentially having environmental concerns. The search was performed in accordance with ASTM E 1527-13 standard approximate minimum search distances from the site to assess whether activities on-site have the potential to create recognized environmental conditions (RECs). A REC refers to the presence or likely presence of any hazardous substances or petroleum products in, on, at or to a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. A controlled recognized environmental condition (CREC) is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A historical recognized environmental condition (HREC) represents a past release of any hazardous substances or petroleum products that has occurred in connection with a property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Asbestos

Based on construction date of the site buildings (beginning in the 1930s), asbestos-containing materials (ACMs) may be present on-site (NV5 2023). The presence of ACMs at the site is not considered a REC but is considered a potential human health concern. In an undisturbed state, asbestos generally does not pose a risk; however, when disturbed or removed (i.e., during remodeling or demolition), friable asbestos fibers may be released into the air and can lead to health concerns such as an increased potential for lung or other types of cancer, as well as other complications with the lungs.

Lead-Based Paint

Based on the construction date of the on-site buildings (beginning in the 1930s), lead-based paint (LBP) may be present. The potential exists for LBPs to have impacted near surface soils at the site. The presence of LBPs on the site structures is not an REC but is considered a potential human health concern.

Hazards/Hazardous Materials Identified On-site

The State of California maintains the EnviroStor and GeoTracker databases of known contamination sites pursuant to Government Code section 65962.5. The Phase I ESA prepared for the Proposed Project did not identify the Proposed Project site on any regulatory agency databases; a complete list of databases reviewed is included in the Phase I ESA (see Appendix B of **Appendix E**). No evidence of a REC, CREC, or HREC in connection with the Proposed Project site was identified in the Phase I ESA (NV5 Alta Environmental 2023). Due to the age of existing structures on the school campus, arsenic, pesticides, and/or poly-chlorinated biphenyls (PCBs) in caulking may have been historically used in building construction or maintenance. As a result, these compounds may be present in shallow soils on-site (NV5 Alta Environmental 2023).

Hazards/Hazardous Materials Identified at Adjacent Properties

A dry cleaner previously operated on the adjoining property to the southeast at 800 Montana Avenue from 1983 through 1997. No records of previous releases were identified for this facility; however, based on the facility's proximity to the Proposed Project site, the former drycleaner is considered to represent a REC and potential vapor encroachment condition (VEC). Additionally, a gas station and oil service station previously operated on the adjacent property to the southwest at 729 Montana Avenue from 1936 through 1992. A release from a UST at this facility was reported in 1988 which impacted soil and groundwater in the vicinity. Site remediation commenced in 1990 and the case was closed with a status of no further action required in 1996 (NV5 2023).

A Tier 1 vapor encroachment screen (VES) was conducted for the Proposed Project site to evaluate the potential for a vapor encroachment condition (VEC), which involves the presence or likely presence of chemicals of concern in subsurface soils with the potential to release vapors from contaminated soil or groundwater on or near a site. If a VEC is identified, it must be determined whether the VEC represents evidence of a REC; however, identification of a VEC does not necessarily indicate that a potential for migration of vapors into existing or proposed structures on the site is likely. A VEC may be identified as a REC where the potential for vapor migration into structures is considered likely, or where contaminant concentrations in the soil, groundwater, or soil vapors on the site are significant and may require enforcement.

Several sites of concern were identified within the VES search radii considered. Based on the proximity of these uses (i.e., gas stations, dry cleaners) to the Proposed Project site and the environmental risk associated with such businesses, there is the potential for such sites to represent a VEC (NV5 2023).

3.7.2 REGULATORY SETTING

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. The act established prohibitions and requirements concerning closed and abandoned hazardous waste at these sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) provides the United States Environmental Protection Agency (USEPA) the authority to control hazardous waste from “cradle-to-grave.” This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also sets forth a framework for the management of non-hazardous wastes.

Hazardous Materials Transportation Act

The US Department of Transportation (USDOT) has developed regulations in Titles 10 and 49 of the Code of Federal Regulations (CFR) pertaining to the transport of hazardous substances and hazardous wastes. The Hazardous Materials Transportation Act is administered by the Research and Special Programs Administration of the USDOT. The act provides the USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property that is inherent in the commercial transportation of hazardous materials. The USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or who is involved in any way with the manufacture or testing of hazardous materials packaging or containers.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 provides the USEPA with the authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The act regulates the manufacturing, inventory, and disposition of industrial chemicals, including hazardous materials.

State

Hazardous Waste Control Act

The Hazardous Waste Control Act of 1972 defines “hazardous waste” under California law, with the California Department of Health Services formalizing the state's management of hazardous waste. The act regulates the identification, generation, transportation, storage, and disposal of materials that the State of California has deemed hazardous.

California Department of Toxic Substances Control (DTSC)

The DTSC is a department of the California Environmental Protection Agency (CalEPA). CalEPA authorizes DTSC to administer the RCRA program in California which is aimed at minimizing potential exposure to hazardous wastes. The DTSC is responsible for regulating hazardous waste; contamination clean-up; and implementing regulations to control and reduce hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code [HSC], Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 CCR Divisions 4 and 4.5). Through permitting, inspection, compliance, and corrective action programs, hazardous waste is managed in compliance with state and federal requirements and other laws pertaining to hazardous waste relative to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

All proposed school sites and existing school sites that receive state funding for acquisition or construction are subject to environmental review and cleanup processes under DTSC's oversight. Such procedures are aimed at ensuring that selected school properties are free of contamination or, if previously contaminated, that they have been remediated to an acceptable level that protects students and staff occupying the new school.

Hazardous Waste and Substances Sites List

The Hazardous Waste and Substances Sites List, also known as the Cortese List, is a planning document used by the state of California and its various local agencies to comply with California Environmental Quality Act (CEQA) requirements to provide information regarding the location of hazardous materials release sites. Government Code section 65962.5 requires that the California Environmental Protection Agency update the list annually. The list is maintained via the California DTSC Brownfields and Environmental Restoration Program (Cleanup Program) and is accessible through the EnviroStor online database.

Title 22 of the California Code of Regulations

CCR Title 22 includes state hazardous waste regulations enforced by the DTSC and local Certified Unified Program Agencies (CUPA). Authority from the state was delegated to local CUPAs to establish a unified hazardous waste and hazardous materials management program for hazardous waste generators, treatment of hazardous waste subject to tiered permitting, facilities with underground storage tanks and aboveground storage tanks, risk management and prevention plans, and hazardous materials management plans and inventory statements required by the Uniform Fire Code.

California Health and Safety Code

State hazardous waste control laws enforced by the DTSC are included in the California Health and Safety Code. These regulations identify standards for the classification, management, and disposal of hazardous waste in California.

Occupational Safety and Health Act

Federal and state occupational safety and health regulations also contain provisions on hazardous materials management as it relates to worker safety, worker training, and worker right-to-know. The applicable federal law is the Occupational Safety and Health Act (OSHA). Under this act, authority to administer the act is delegated to states that have developed a plan with provisions that are at least as stringent as those provided by the OSHA. California is a delegated state for federal OSHA purposes, with its authorized regulations and programs commonly referred to as Cal/OSHA.

Comprehensive School Safety Plan

Education Code sections 32280-32288 outline the requirements of all schools operating any kindergarten and any grades 1 to 12, inclusive, to write and develop a school safety plan relevant to the needs and resources of that school. The historical requirement of the California School Safety Plan (CSSP) was presented in Senate Bill 187, which was approved by the governor and chaptered in 1997. This legislation contained a sunset clause that stated that this legislation would remain in effect only until January I, 2000. Senate Bill 334 was approved and chaptered in 1999 and perpetuated this legislation under the requirement of the initial legislation.

In 2004, the California legislature and governor recast and renumbered the CSSP provisions in Senate Bill 719 and Assembly Bill 115. It is the intent of the legislature in enacting these provisions to support California public schools as they develop their safety plans that are the result of a systematic planning process and that include strategies aimed at the prevention of, and education about, potential incidents involving crime and violence on school campuses. The CSSPs are typically reviewed and updated by March 1 on an annual basis.

CSSPs are required under Senate Bill 719 and Assembly Bill 115 to contain the following elements:

- Assessment of school crime committed on school campuses and at school-related functions
- Child abuse reporting procedures
- Disaster procedures
- Suspension and expulsion policies
- Procedures to notify teachers of dangerous pupils
- Discrimination and harassment policies
- School-wide dress code policies
- Procedures for safe ingress and egress
- Policies enacted to maintain a safe and orderly environment
- Rules and procedures on school discipline
- Hate crime reporting procedures

Regulations for Hazardous Materials in Structures

Lead is regulated as a hazardous material; inorganic lead is regulated as a toxic air contaminant. According to Cal/OSHA, lead-containing paints are those reported with detectable levels of lead by paint chip analysis (8 CCR, § 1532.1(d)). When disturbed during construction activities, such surfaces are subject to exposure assessment requirements pursuant to Cal/OSHA.

Under the Clean Air Act, asbestos is regulated as a hazardous air pollutant. Asbestos represents a potential safety hazard to workers under the authority of the federal Occupational Safety and Health Administration. Cal/OSHA considers ACM to be a hazardous substance when a bulk sample contains more than 0.1 percent asbestos by weight and requires a qualified contractor licensed to handle asbestos. Activities including cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities have the potential to result in release of friable asbestos fibers unless proper precautions are implemented.

The following regulations pertain to abatement of and protection from exposure to lead-based paint and asbestos containing material:

- Lead-based paint
  - 8 CCR Subchapter 4, Construction Safety Orders, § 1532.1
  - 29 CFR 1926, Subpart D
- Asbestos
  - 8 CCR Subchapter 4, section 1529
  - 29 CFR 1926, Subpart Z
  - 40 CFR 61, Subpart M

The above regulations provide exposure limits, exposure monitoring, respiratory protection, and good working practice for workers exposed to lead and ACM. In California, ACM and lead-based-paint abatement must be performed and monitored by contractors with appropriate certification from the California Department of Health Services. HSC §§ 17920.10 and 105255 require lead to be contained during demolition activities.

Additionally, PCBs were commonly used in the small capacitor in fluorescent light ballasts through 1979. PCB regulations are included in 40 CFR § 761, which requires that the material be incinerated. The entire lighting fixture does not require special handling or disposal unless the ballast (electrical box) is leaking; nonleaking ballasts can be removed and recycled or disposed of properly.

Regional

South Coast AQMD Rules and Regulations

Development projects within the South Coast Air Basin (SoCAB) are subject to rules and regulations of the South Coast Air Quality Management District (SCAQMD) in effect at the time of activity.

- **Rule 403, Fugitive Dust**. Rule 403 is aimed at reducing the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources. The rule requires certain actions to prevent, reduce, or mitigate fugitive dust emissions and applies to any activity or human-made condition capable of generating fugitive dust. The rule also requires that best available control measures be applied during earth-moving and grading activities to reduce the potential generation of fugitive dust.

- **Rule 1403, Asbestos Emissions from Demolition/Renovation Activities**. Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including removal and/or disturbance of ACM. Demolition and renovation activities are required to include asbestos surveying, notification, removal procedures and time schedules, handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials. Operators are required to maintain records, including waste shipment records, and to use appropriate warning labels, signs, and markings as appropriate.

Local

Santa Monica Fire Department CUPA

As the designated CUPA for the City, the Santa Monica Fire Department (SMFD) is the primary local agency with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management. The SMFD was certified by the California Environmental Protection Agency as the CUPA for the City in 1997. Designed to protect the public, worker safety, first responders, and the environment, the SMFD has oversight responsibility for hazardous waste, underground storage tanks, aboveground tanks, hazardous materials, community right-to-know, and accidental release prevention programs. The SMFD conducts both CUPA regulatory inspections and Fire Code inspections for all program elements, except for the hazardous waste program. The SMFD contracts with the Los Angeles County Fire Department Health Hazardous Materials Division for hazardous waste inspection and enforcement of the hazardous waste program. The SMFD maintains the records regarding location and status of hazardous materials sites in the City and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials.

City of Santa Monica Municipal Code (SMMC), Chapter 5.24

Chapter 5.24 of the SMMC establishes requirements for hazardous materials reporting and response planning and hazardous materials management plans. Section 5.24.010 states: "The information provided by business and area plans is necessary to prevent or mitigate the damage to the health and safety of persons and the environment from the release or threatened release of hazardous materials into the workplace and environment."

Emergency Response Plan

The City of Santa Monica Office of Emergency Management has prepared a Multi-Hazard Functional Emergency Plan which addresses City response to natural or human-caused disasters and compares operational concepts of the City's emergency/disaster management organization with Standardized Emergency Management Systems and the National Incident Management System. The plan focuses on large-scale events and places emphasis on emergency/disaster planning, volunteer training, public outreach, and resources for disaster response.

The Disaster Mitigation Act of 2000 requires plan revisions to be reviewed and approved by the Federal Emergency Management Agency every five years. The City's existing plan was last approved in October 2016. The Santa Monica Office of Emergency Management is actively coordinating the City's process for its Local Hazard Management Plan (LHMP) updates and mitigation planning efforts, as well as coordinating updates to the LHMP with current City updates to the General Plan Safety Element. The updated Safety Element will integrate the risk reduction and emergency response strategies identified in the LHMP (City of Santa Monica 2023a).

3.7.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines contains analysis guidelines related to the assessment of hazards and hazardous materials impacts. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold HAZ-1: ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.***

Threshold HAZ-2: ***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.***

Threshold HAZ-3: ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.***

Threshold HAZ-4: ***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.***

Threshold HAZ-5: ***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.***

Threshold HAZ-6: ***Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.***

Threshold HAZ-7: ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.***

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiates that the Proposed Project would have no impact or a less than significant impact related to the following thresholds. Therefore, these thresholds are not analyzed herein.

Threshold HAZ-1: ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.***

Threshold HAZ-4: 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.

Threshold HAZ-5: 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.

Threshold HAZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Threshold HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.7.4 PROJECT DESIGN FEATURES

All Proposed Project construction activities would occur in accordance with applicable federal, state, and local regulations. There are no other Project design features for hazards or hazardous materials.

3.7.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

This analysis evaluates anticipated changes in the physical environment resulting from the Proposed Project against the thresholds of significance identified above to determine if direct or indirect changes from existing conditions would constitute a potentially significant effect. Project changes are described and potential impacts, if any, are identified under the impact discussion. Where impacts would be considered potentially significant, mitigation measures are identified to reduce impacts to a less than significant level.

Threshold HAZ-2: 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.

Construction of the Proposed Project could potentially involve the use of hazardous materials, including gasoline, diesel fuel, lubricating oil, grease, solvents, and other chemicals, specifically related to the use of construction equipment or vehicles. These materials are used routinely for similar types of construction projects, and the use of these materials would be temporary during construction activities of the Proposed Project. Any potential spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable federal, state, and/or local regulations for cleanup and disposal of the contaminant.

Additionally, any contaminated waste encountered (such as arsenic, lead, asbestos, pesticides, and/or PCBs based on the age of existing structures) would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. All hazardous materials would be properly handled, transported, used, and disposed of in accordance with applicable federal, state, and local laws regulating the management and use of hazardous materials.

Compliance with these regulations would reduce the potential for hazardous materials to be released to the environment during construction.

Based on the age of on-site structures that are proposed for renovation and demolition, hazardous building materials such as LBP, ACM, pesticides, and PCBs could be present in the existing structures. These hazardous materials could also be present in shallow soils on the campus because the historical and existing on-site structures have aged and weathered since construction in the 1930s and 1940s. The removal of building materials and disturbance of potentially contaminated soils could therefore result in the release of hazardous materials into the environment. Exposure of construction workers or members of the public could result from direct contact with these substances during demolition and/or grading activities, incidental ingestion of these substances, and/or inhalation of airborne dust released from dried hazardous materials. Impacts would therefore be potentially significant due to the potential presence of hazardous building materials and soil contamination at the campus and the potential for the Proposed Project to result in the release of these materials to the environment. Impacts would be reduced to a less than significant level with implementation of Mitigation Measures **MM HAZ-1** and **MM HAZ-2**.

Additionally, no evidence of a HREC or CREC in connection with the Proposed Project site was identified during the Phase I ESA. However, as discussed previously, the southeastern adjoining property (800 Montana Avenue) was previously developed with an on-site drycleaning business that operated from 1983 to 1997. Other former gasoline/automotive repair facilities and dry-cleaning businesses, located within 1/8 mile of the Proposed Project site, have also previously operated along Montana Avenue. While no records of spills, leaks, or releases of hazardous substances of petroleum products have been reported at these facilities, they are considered to represent potential VECs based on proximity to the Proposed Project site (NV5 2023). As excavation and grading activities associated with Proposed Project construction may have the potential to disturb underlying soils and result in release or exposure of unknown hazardous materials, soil vapor sampling is recommended to assess the potential for subsurface VOC vapor migration from the former gasoline stations/automotive repair facilities and dry-cleaning businesses. As such, Mitigation Measure **MM HAZ-3** would be implemented to ensure that any concentrations of VOCs in soil vapor exceeding the applicable regulatory standards are properly managed and/or removed from the Proposed Project site to reduce potential impacts from upset or accident conditions involving the release of hazardous materials into the environment to less than significant.

Standard operations and maintenance at the school may involve limited use of common household hazardous materials and/or storage of such materials in a janitorial storeroom, including cleaning solutions, bleach, and/or automotive lubricants, similar to that which occurs under existing conditions. The USEPA Facility Index System/Facility Registry System (FINDS) database and RCRA NonGen/NLR database indicates that the subject site is not listed as a handler of nonhazardous or hazardous waste (NV5 Alta Environmental 2023). Proposed Project compliance with standard regulatory requirements would ensure that potential impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment as a result of school operations remain less than significant.

Mitigation Measures

MM HAZ-1 Prior to demolition or renovation activities, the existing buildings proposed for demolition or renovation shall be inspected by a qualified environmental specialist for the presence of hazardous building materials, including asbestos containing materials, lead-based paints, and polychlorinated biphenyls. If hazardous building materials are detected, abatement and removal of these materials shall be conducted in accordance with applicable federal, state, and local guidelines as follows:

- In the event that asbestos containing material and/or lead-based paints are found on the campus, notice shall be provided to South Coast Air Quality Management District, and any demolition activities likely to disturb asbestos containing material and/or lead-based paints shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work in conformance with South Coast Air Quality Management District, California Occupational Safety and Health Act (e.g., Asbestos Consultant and Technician Certification), California Department of Public Health (e.g., Department of Public Health Lead-Related Construction Certification), Department of Toxic Substances Control, and other applicable requirements. If found, asbestos containing material and/or lead-based paint shall be disposed of at an appropriately permitted facility.

- If polychlorinated biphenyls are found on the campus, these materials shall be managed in accordance with the Metallic Discards Act of 1991 (PRC, sections 42160-42185) and other state and federal guidelines and regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly section 42175, Materials Requiring Special Handling, for the removal of polychlorinated biphenyls.

- Once hazardous building materials are removed, a follow-up inspection shall be performed of the existing buildings prior to demolition or renovation to confirm that the hazardous items have been removed to an acceptable level per Department of Toxic Substances Control requirements before commencing with demolition activities.

MM HAZ-2 The District shall retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments to conduct soil sampling. The soil sampling shall be conducted prior to any disturbance of the area(s) suspected of potential contamination to evaluate shallow soil conditions with respect to arsenic, lead-based paint, pesticides, and/or polychlorides residues from on-site structures . If the soil sampling identifies the presence of contaminated soils, the contractor shall develop a plan for removal or encapsulation of the affected soils. A Site Management Plan, Corrective Action Plan, Remedial Action Plan, or other equivalent plan shall be prepared that adheres to the Department of Toxic Substances' requirements, regulations, guidance documents, policies, and procedures. The Plan shall include a Health & Safety Plan (HASP) and shall establish remedial measures and/or soil management practices to ensure construction worker safety and the health of future site occupants and visitors. The Plan shall include a plan for management of soil during construction, dust control measures, and waste management.

After the District confirms that the affected soils have been removed, through the collection of soil samples in the excavation areas, the excavation shall be backfilled and compacted with clean soil, and the contractor shall prepare a Completion

Report that documents the removal and presents analytical results for the confirmation samples.

MM HAZ-3 **Hazardous On-site Contamination.** Prior to the issuance of a grading permit, the applicant shall conduct additional characterization of the Proposed Project site to assess whether migration of soil vapor impacted with volatile organic compounds from former historical uses near the Proposed Project site has affected the subject property. Construction of the Proposed Project shall not commence until it has been confirmed that soil vapor has not impacted the site or that such conditions have been remediated/mitigated.

If concentrations of VOCs in soil vapor exceeding the applicable regulatory standards (i.e., Department of Toxic Substances Control Human Health Risk Assessment Screening Levels) are identified at the Proposed Project site, a Remedial Action Plan shall be prepared and shall include measures to remove or protect against the contaminated conditions. Such measures may include, but may not be limited to, soil vapor extraction; installation of passive venting and implementation of a membrane with the sub-slab design; installment of other vapor barriers and venting systems; and/or ongoing monitoring of soil vapors if future construction is planned for the identified affected areas.

Level of Significance

With implementation of Mitigation Measures **MM HAZ-1** and **MM HAZ-2,** along with compliance with the above-described laws and regulations governing the removal and disposal of lead-based paint, asbestos containing material, pesticides, and PCBs during demolition and grading, impacts would be less than significant because any hazardous materials would be properly tested, removed, and disposed. Similarly, Mitigation Measure **MM HAZ-3** would ensure that any concentrations of VOCs in soil vapor exceeding the applicable regulatory standards are identified and reduced through proper measures to avoid exposure to potentially hazardous conditions. Therefore, impacts related to release of hazardous materials into the environment would be less than significant with mitigation incorporated.

Threshold HAZ-3: ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.***

The Proposed Project site currently supports Roosevelt Elementary School. The Young Scholars Academy Resource Group is located at 1112 Montana Avenue, approximately 0.18 mile to the northeast. No other existing or proposed schools are located within one-quarter mile of the subject site.

The Proposed Project's construction activities could involve the use of hazardous materials, such as fuels, oils, mechanical fluids, and other chemicals. These materials are not considered acutely hazardous and would be used in limited quantities. In addition, the transportation, storage, use, and disposal of such hazardous materials during construction activities would be conducted in accordance with applicable federal, state, and local statutes and regulations.

Demolition, remediation, and renovation of existing buildings and earth-moving activities at the campus could result in the release of hazardous building materials and soil contaminants such as lead-based paint, asbestos, pesticides, or PCBs. Release of these hazardous materials may create a hazard to the public, with the potential to affect students, staff, and/or visitors at Roosevelt Elementary School, resulting in a potentially significant impact. However, compliance with regulatory requirements and implementation of Mitigation Measures **MM HAZ-1** and **MM HAZ-2** would ensure that such materials would be properly removed, handled, and disposed of. Additionally, **MM HAZ-3** would require identification of any exceedance of VOCs in soil vapor through soil testing, and proper treatment or removal of any associated contaminated soils to avoid exposure to potentially hazardous conditions. These mitigation measures would minimize the potential for the release of hazardous building materials or soil contaminants during construction activities and would ensure that students, faculty, and visitors at the school are not exposed to hazardous material releases.

As indicated above, daily operations at the school may involve limited use of common household hazardous materials and/or storage of such materials such as cleaning supplies and those associated with routine maintenance activities or equipment use. Compliance with standard federal, State, and/or local regulatory requirements would ensure that potential impacts related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within proximity to the school facilities or its occupants remain less than significant.

Mitigation Measures

Implement Mitigation Measures **MM HAZ-1** to **MM HAZ-3.**

Level of Significance

With implementation of Mitigation Measures **MM HAZ-1** to **MM HAZ-3,** along with Proposed Project compliance with applicable laws and regulations governing the removal and disposal of lead-based paint, asbestos, pesticides, and PCBs during demolition and grading, impacts would be reduced to less than significant as any hazardous materials would be properly tested, removed, and disposed of. Further, Mitigation Measure **MM HAZ-3** would ensure that exposure to any soils where an exceedance in VOCs in soil vapor is identified is minimized through proper management and/or removal in order to avoid exposure to hazardous conditions. Impacts related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would be less than significant with mitigation incorporated.

3.7.6 CUMULATIVE IMPACT ANALYSIS

The study area considered for cumulative impacts is the City of Santa Monica. Impacts related to hazards and hazardous waste impacts are typically unique to a project site and conditions do not usually combine to contribute to impacts on a cumulative level.

Future planned discretionary projects in the vicinity of the Proposed Project (refer to **Table 3-1, Cumulative Projects List**, and **Figure 3-1, Cumulative Projects**) would be subject to review in separate environmental documents and required to conform to City of Santa Monica General Plan and Municipal Code requirements and other local regulations, as appropriate. Additionally, all such projects would be required to evaluate the potential for development to result in public exposure to and/or release of hazardous materials or substances consistent with local, state, and federal requirements prior to grading activities, if such conditions are suspected or known. If such conditions are determined to be present, remediation or other appropriate action would be required in conformance with applicable regulations to minimize and/or avoid potential adverse effects on the public, prior to commencement of any proposed improvements.

As indicated above, implementation of Mitigation Measures **MM HAZ-1** to **MM HAZ-3** would ensure that implementation of the Proposed Project results in less than significant impacts relative to hazards and hazardous materials. As impacts relative to hazards and hazardous materials are generally not cumulative in nature, and Proposed Project impacts would be reduced to less than significant with mitigation incorporated, cumulative impacts of past, present, and reasonably foreseeable future projects, when considered in combination with the Proposed Project, would not be cumulatively considerable; thus, cumulative impacts would be less than significant.

Mitigation Measures

Implement Mitigation Measures **MM HAZ-1** to **HAZ-3.**

Level of Significance

Less than significant with mitigation incorporated.

This page left blank intentionally.

3.8 NOISE

This section of the EIR addresses potential noise impacts that may result from construction and/or operation of the Roosevelt Elementary School Campus Master Plan (Proposed Project). The following discussion describes the existing noise environment, evaluates the Proposed Project's consistency with applicable goals and policies, analyzes environmental impacts, and identifies measures to reduce or avoid adverse noise impacts anticipated with implementation of the Proposed Project, as applicable.

3.8.1 ENVIRONMENTAL SETTING

Terminology

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as "noisiness" or "loudness." The following are brief definitions of terminology used in this chapter:

- **Sound**: A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise:** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB)**: A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA)**: An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq}):** The mean of the noise level, energy-averaged over the measurement period.
- **Day-Night Level (L_{dn})**: The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to sound levels from 10:00 PM to 7:00 AM.
- **Community Noise Equivalent Level (CNEL)**: The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the levels from 7:00 PM to 10:00 PM and 10 dB added from 10:00 PM to 7:00 AM.

Characteristics of Sound

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dB are detectable under quiet, controlled conditions and changes of less than 1 dBA are usually indiscernible. A 3 dB change in noise levels is considered the minimum change that is detectable with human hearing in outside environments (FHWA 2023). A change of 5 dB is readily discernible to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound (FHWA 2023).

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, though people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz.

Noise (unwanted sound) is known to have adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

Measurement of Sound

Sound intensity is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level deemphasizes low and very high frequencies of sound, similar to the human ear’s deemphasis of these frequencies.

Unlike units of measure that are computed with arithmetic functions (such as adding or subtracting numbers), decibels are measured and processed on a logarithmic scale. On a logarithmic scale, an increase of 10 dB is ten times more intense than 1 dB, a 20-dB increase is 100 times more intense, and a 30 dB is 1,000 times more intense. A sound as soft as human breathing is approximately 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud). **Table 3.8-1, Change in Apparent Loudness**, shows the subjective effect of changes in sound pressure levels.

TABLE 3.8-1
CHANGE IN APPARENT LOUDNESS

Change in dB	Description
±3 dB	Threshold of human perceptibility
±5 dB	Clearly noticeable change in noise level
±10 dB	Half or twice as loud
±20 dB	Much quieter or louder

Source: Bies and Hansen 2009

Sound levels decrease, and dissipate exponentially, as the distance from their source increases. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by approximately 3 dB for each doubling of distance in a hard site environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dB for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called Leq), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L50 noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level, and half the time the noise level is less than this level. This level also represents the level that is exceeded 30 minutes in an hour. Similarly, the L2, L8, and L25 values represent the noise levels that are exceeded 2, 8, and 25 percent of the time, or 1, 5, and 15 minutes per hour. These "L" values are typically used to demonstrate compliance for stationary noise sources with an adopted noise ordinance. Other values typically noted during a noise survey are the L_{min} and L_{max}. These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor; this is called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). The CNEL descriptor requires that an increment of 5 dBA be added to the actual noise level for the hours from 7:00 PM to 10:00 PM and 10 dBA be added for the hours from 10:00 PM to 7:00 AM. The L_{dn} descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 PM and 10:00 PM. Both descriptors give roughly the same 24-hour level, with the CNEL being only slightly more restrictive (i.e., higher).

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA (HHS 2022). Exposure to high noise levels affects the entire human system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and thereby affecting blood pressure, functions of the heart, and the nervous system. Furthermore, extended periods of noise exposure above 90 dBA could result in permanent hearing damage.

Vibration Fundamentals

Vibration is a trembling, quivering, or oscillating motion of the earth. Like noise, vibration is transmitted in waves, but in this case through the earth or solid objects. Unlike noise, vibration is typically felt rather than heard.

Vibration can be either natural as in the form of earthquakes, volcanic eruptions, sea waves, or landslides, or man-made as from explosions, the action of heavy machinery, or heavy vehicles such as trains. Both natural and man-made vibration may be continuous, such as from operating machinery, or transient, as from an explosion.

As with noise, vibration can be described by both its amplitude and frequency. Amplitude may be characterized in three ways: displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position and, for the purposes of soil displacement, is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Particle acceleration is the rate of change in velocity with respect to time and is measured in inches per second or millimeters per second. Typically, particle velocity and/or acceleration are used to describe vibration. **Table 3.8-2, Human Reaction to and Effect on Buildings from Typical Vibration Levels,** shows the human reaction to various levels of vibration and the effects such vibration levels may have on structures.

TABLE 3.8-2
HUMAN REACTION TO AND EFFECT ON BUILDINGS FROM TYPICAL VIBRATION LEVELS

Vibration Level (Peak Particle Velocity, inches/seconds)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwelling—houses with plastered walls and ceilings
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: Caltrans 2002

Vibration also varies in frequency, and this affects perception. Typical construction vibrations fall in the 10–30 Hz range, usually around 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate frequencies around 3 Hz at high vehicle speeds. It is less common, but possible, to measure traffic frequencies above 30 Hz.

The way in which vibration is transmitted through the earth is called propagation. Propagation of groundborne vibrations is complicated and difficult to predict because of the endless variations in the soil through which waves travel. There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Raleigh waves, travel along the ground’s surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a “push-pull” fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse (i.e., side to side and perpendicular to the direction of propagation).

As vibration waves propagate from a source, the energy is spread over an ever-increasing area, such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation (decrease) provided by material damping varies with soil type and condition as well as the frequency of the wave.

3.8.2 ENVIRONMENTAL SETTING

The Proposed Project is in a highly urbanized setting in Santa Monica, which is largely built-out. The site is surrounded by commercial and multifamily residential uses. Multifamily residential uses are located north, south, and west side of the Proposed Project site, along 9th Street, Lincoln

Boulevard, and Alta Avenue. The commercial uses include a supermarket, and small strip malls that front onto Montana Avenue. Multifamily residential uses are located approximately 50 feet northwest of the Proposed Project site along Alta Avenue, between 9th Street and Lincoln Boulevard, as well as southwest and northeast of the Proposed Project site, along 9th Street and Lincoln Boulevard.

Sensitive Receptors

Noise- and vibration-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound or vibration could adversely affect the designated land uses. Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The effects of noise on humans can range from temporary or permanent hearing loss to mild stress and annoyance, due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Certain land uses are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. Residential areas are also considered noise sensitive, especially during the nighttime hours. Based on the City of Santa Monica's Municipal Code, noise-sensitive land uses include residential properties, public or private schools, places of worship, cemeteries, libraries, and hospitals and similar health care institutions. Sensitive receptors surround the Proposed Project site; refer to **Table 3.8-3, Off-Site Sensitive Receptors,** and **Figure 3.8-1, Noise Measurements and Off-Site Sensitive Receptors**, for the closest sensitive receptors in each direction.

The nearest off-site noise-sensitive land uses in the vicinity are multifamily residences approximately 50 feet northwest of the Proposed Project boundary. However, the distance from demolition, grading, and construction activities would change with each phase of construction.

TABLE 3.8-3
OFF-SITE SENSITIVE RECEPTORS

Site Number	Description	Distance from Project Site (feet)
1	Multifamily Residential to the Northwest	50
2	Multifamily Residential to the Northeast	80
3	Multifamily Residential to the Southwest	80
4	Multifamily Residential to the Southeast	280

Source: Google Earth 2023

On-site noise-sensitive receptors would include students in classrooms. During each construction phase, displaced school facilities and students would be relocated to different locations on campus.

This page intentionally left blank.

Michael Baker INTERNATIONAL

N

NOT TO SCALE

Source: Google Earth Pro, September 2024

ROOSEVELT ELEMENTARY SCHOOL CAMPUS PLAN EIR

Noise Measurements And Off-Site Sensitive Receptors

Figure 3.8-1

This page intentionally left blank.

Existing Noise Levels

The Proposed Project area is subject to typical urban noises, such as noise generated by traffic, school, and day-to-day outdoor activities. Noise around the site is the cumulative effect of noise from transportation activities and stationary sources. Transportation noise typically refers to noise from automobile use, trucking, airport operations, and rail operations. Stationary noise typically refers to noise from sources such as heating, ventilation, and air conditioning (HVAC) systems, compressors, landscape maintenance equipment, or machinery associated with local industrial or commercial activities. The Proposed Project site is primarily subject to traffic noise on the adjacent roadways.

Five short-term (10 minutes in duration each) noise measurement locations that represented key potential sensitive receptors or sensitive land uses were selected adjacent to or near the Proposed Project site; these locations are depicted as Noise Measurements 1 through 5 (NM-1 through NM-5) on **Figure 3.8-1**. The short-term measurements measured average, maximum, and minimum noise levels. Measurement locations are listed in **Table 3.8-4, Short-Term Measured Noise Levels**.

TABLE 3.8-4
SHORT-TERM MEASURED NOISE LEVELS

Measurement Location	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)	L_{min} (dBA)
NM-1	North of Roosevelt Elementary School, next to 557 Lincoln Boulevard	November 8, 2023	12:10 PM–12:20 PM	58.3	76.9	48.0
NM-2	In front of 611 Ninth Street	November 8, 2023	12:28 PM–12:38 PM	56.1	77.8	45.0
NM-3	In front of 717 Ninth Street	November 8, 2023	12:44 PM–12:54 PM	55.7	71.4	46.1
NM-4	In front of 702-706 Lincoln Boulevard	November 8, 2023	1:01 PM–1:11 PM	65.4	87.7	47.4
NM-5	In front of 818 Lincoln Boulevard	November 8, 2023	1:26 PM–1:36 PM	62.1	81.0	49.5

Source: Appendix J, Noise Data.

3.8.3 REGULATORY SETTING

State

The Governor's Office of Planning and Research (OPR) Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The Noise Element Guidelines contain a table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the CNEL. **Table 3.8-5, Land Use Compatibility for Community Noise Environments,** presents guidelines for determining acceptable and unacceptable community noise exposure limits for various land use categories. The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

TABLE 3.8-5
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS

Land Use Category	Community Noise Exposure (CNEL)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	50–60	55–70	70–75	75–85
Residential – Multiple Family	50–65	60–70	70–75	70–85
Transient Lodging – Motel, Hotels	50–65	60–70	70–80	80–85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50–70	60–70	70–80	80–85
Auditoriums, Concert Halls, Amphitheaters	NA	50–70	NA	65–85
Sports Arenas, Outdoor Spectator Sports	NA	50–75	NA	70–85
Playgrounds, Neighborhood Parks	50–70	NA	67.5–75	72.5–85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50–70	NA	70–80	80–85
Office Buildings, Business Commercial and Professional	50–70	67.5–77.5	75–85	NA
Industrial, Manufacturing, Utilities, Agriculture	50–75	70–80	75–85	NA

Source: OPR 2003
NA: Not Applicable; Ldn: Average Day/Night Sound Level; CNEL: Community Noise Equivalent Level Notes:
Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
Normally Unacceptable – New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable – New construction or development should generally not be undertaken.

Local

City of Santa Monica General Plan

The City of Santa Monia General plan Noise Element addresses the issue of noise by identifying sources of noise in the City and providing objectives and policies that ensure that noise from various sources would not create an unacceptable noise environment. The Noise Element places limitations on noise produced by equipment operation, human activities, and construction. **Table 3.8-6, Interior and Exterior Noise Standards,** presents design standards to be used in the project design stage. Compliance with these standards is required in conditions of approval or other requirements and evaluated as part of the City's development review process.

TABLE 3.8-6
INTERIOR AND EXTERIOR NOISE STANDARDS

Proposed Land Use Categories		Design Standard CNEL	
Categories	**Uses**	**Indoor**	**Outdoor/ Open Space**
Residential	Single-Family, Duplex, Multi-Family	45	65
Residential	Mobile Home	---	65
Commercial	Hotel, Motel, Transient Lodging	45	65
Commercial	Commercial Retail, Bank, Restaurant	55	---
Commercial, Industrial, Institutional	Office Building, Research and Development, Professional Offices, City Office Building	50	---
Commercial, Recreational, Institutional	Amphitheatre, Concert Hall, Auditorium, Meeting Hall	45	---
Commercial, Recreational	Gymnasium (Multipurpose)	50	---
Commercial, Recreational	Sports Club	55	---
Commercial, Industrial	Manufacturing, Warehousing, Wholesale, Utilities	65	---
Commercial	Movie Theatres	45	---
Institutional	Hospital, School	45	65
Institutional	Church, Library	45	---
Open Space	Parks	---	65

Source: City of Santa Monica 1992

The Noise Element policies and actions relevant to the Proposed Project are identified below.

- **Policy 4**: The City shall develop measures to control construction noise impacts.
- Action 4.1(1): Clearly state the permitted hours of construction and expressly prohibit construction on Sunday.

City of Santa Monica Municipal Code

Municipal Code Chapter 4.12 (Noise) includes limitations on unnecessary, excessive, and annoying noises.

Section 4.12.030 – Exemptions

Section 4.12.030 lists the following activities that are exempt from noise regulations.

- Activities conducted on public or private school grounds including, but not limited to, school athletic and school entertainment events.
- Community events.

- Activities conducted on public property that is generally open to the public, including, but not limited to, streets, sidewalks, alleys, parkways, parks, and beaches.

Section 4.12.050 – Designated Noise Zones

The Santa Monica Municipal Code defines noise zones as follows:

- Noise Zone I. All property in a residential district established by Santa Monica Municipal Code Section 9.02.010 (B)(1) or any revisions thereto; except, however, the Santa Monica Pier shall be excluded from this noise zone.

- Noise Zone II. All property in a nonresidential district established by Santa Monica Municipal Code Section 9.02.010(B)(2) or any revisions thereto; expect, however, the industrial conservation district shall be excluded from this noise zone and the Santa Monica Pier shall be included in this noise zone.

- Noise Zone III. All property in the industrial conservation district as established by Santa Monica Municipal Code Section 9.02.010(A).

Section 4.12.060 – Exterior Noise Standards

Section 4.12.060 outlines the noise standards for Noise Zones I, II, and III (see **Table 3.8-7, Exterior Noise Standards in the City of Santa Monica**). The noise ordinance also states that if the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard.

TABLE 3.8-7
EXTERIOR NOISE STANDARDS IN THE CITY OF SANTA MONICA

Noise Zone	Time Interval	Allowable L_{eq}	
		15-Minute Continuous Measurement Period	5-Minute Continuous Measurement Period
I	Monday—Friday		
	10 PM to 7 AM	50 dBA	55 dBA
	7 AM to 10 PM	60 dBA	65 dBA
	Saturday and Sunday		
	10 PM to 8 AM	50 dBA	55 dBA
	8 AM to 10 PM	60 dBA	65 dBA
II	All days of week		
	10 PM to 7 AM	60 dBA	65 dBA
	7 AM to 10 PM	65 dBA	70 dBA
III	Anytime	70 dBA	75 dBA

Source: Santa Monica Municipal Code Section 4.12.060

Section 4.12.070 – Vibration

With regard to vibration, Section 4.12.070 prohibits any person to create, maintain, or cause any ground vibration that is perceptible without instruments at any point on any property. The perception threshold shall be presumed to be more than 0.05 inches per second root-mean-square velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft is exempt from this section.

Section 4.12.110 – Restrictions on Demolition, Excavation, Grading, Spray Painting, Construction, Maintenance, or Repair of Buildings

Section 4.12.110 restricts the hours for construction activity to between 8:00 AM to 6:00 PM on Mondays through Fridays and 9:00 AM to 5:00 PM on Saturdays, with some exceptions for construction that the City deems to be in the public interest. Construction activity is prohibited on Sundays and holidays. This section also sets limits for noise from construction activities relative to the noise standards set in Section 4.12.060, with the equivalent noise level not to exceed 20 dBA above standards and the maximum instantaneous noise level not to exceed 40 dBA above standards. Any construction exceeding this limit is required to occur between 10:00 AM and 3:00 PM Monday through Friday.

A permit may be issued authorizing construction activity during the times prohibited by this section whenever it is found to be in the public interest. Prior to commencing work pursuant to the permit, notification will be provided to persons occupying property within a perimeter of 500 feet of the site of the proposed construction activity. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit.

3.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines as amended contains analysis guidelines related to the assessment of noise and vibration impacts. These guidelines have been utilized as thresholds of significance for this analysis. A project would have a significant impact if it would result in:

Threshold NOI-1: ***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.***

Threshold NOI-2: ***Generation of excessive groundborne vibration or groundborne noise levels.***

Threshold NOI-3: ***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, exposure of people residing or working in the project area to excessive noise levels.***

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiates those impacts associated with the following threshold would have no impact, as the Project site is not located within the vicinity of an airport or airstrip, or within an airport land use plan. Therefore, this threshold is not analyzed herein.

Threshold NOI-3: ***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, exposure of people residing or working in the project area to excessive noise levels.***

3.8.5 PROJECT DESIGN FEATURES

There are no Project design features for noise.

3.8.6 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

This analysis evaluates noise impacts as a result of construction and buildout of the Proposed Project. Construction equipment and surrounding sensitive receptors (with consideration for intervening building façades and distance) have been identified. Construction noise was calculated using the Federal Highway Administration's Roadway Construction Noise Model version 1.1. Modeling assumed that construction activities would occur at the nearest edge of each construction area to a sensitive receptor building of each of the five phases. In cases where multiple areas were either demolished or constructed during a phase, the area closest to the sensitive receptor was used.

This analysis evaluates anticipated changes in the physical environment resulting from the Proposed Project against the thresholds of significance identified below to determine if direct or indirect changes from existing conditions would constitute a potentially significant effect. Proposed Project changes are described and potential impacts, if any, are identified under each impact discussion. Where impacts are considered potentially significant, mitigation measures (MM) are identified to reduce impacts to less than significant.

Threshold NOI-1 ***Generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.***

Construction

Effects of construction noise largely depend on the type of construction activities occurring, noise levels generated by those activities, distances to noise-sensitive receptors, and the existing ambient noise environment in the receptor's vicinity. Construction generally occurs in several discrete stages, with each stage requiring different equipment having varying noise characteristics. These stages alter the characteristics of the noise environment generated on the Proposed Project site and in the surrounding community for the duration of the construction process. Construction of the Proposed Project would occur in five phases over seven years and is anticipated to start in second quarter 2025 and end in the first quarter of 2032. The five phases would occur at the District's discretion when funding becomes available. Each phase would include demolition, grading, building construction, paving, and architectural coating.

The potential for construction-related noise to affect nearby sensitive receptors would depend on multiple variables, including the specific equipment types, size and number of equipment uses, amount of time each piece is in operation, the load factors of the equipment in use, , and the location and proximity of construction activities to the receptors. Groundborne noise and other types of construction-related noise impacts would typically occur during the initial earthwork phases. This phase of construction has the potential to create the highest levels of noise. Typical noise levels generated by construction equipment are shown in **Table 3.8-8, Construction Equipment Noise Emission Levels.**

TABLE 3.8-8
CONSTRUCTION EQUIPMENT NOISE EMISSION LEVELS

Equipment	Typical Noise Level (dBA) 50 Feet from Source
Air Compressor	81
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Crane	83
Dozer	85
Generator	81
Grader	85
Loader	85
Paver	89
Roller	74
Truck	88

Source: FTA 2006

Construction equipment can be either mobile or stationary. Mobile equipment (e.g., loaders, graders, dozers) moves around a construction site performing tasks in a recurring manner. Stationary equipment (e.g., air compressor, generator, concrete saw) operates in a set location for an extended period of time to perform continuous or periodic operations. Thus, determining the location of stationary sources during specific phases, or the effective acoustical center of operations for mobile equipment during various phases of the construction process, is necessary. Additionally, operational characteristics of heavy construction equipment are typified by short periods of full power operation followed by extended periods of operation at lower power, idling, or powered-off conditions. As indicated in **Table 3.8-8**, noise levels for typical construction activities would generate noise levels ranging from 74 to 89 dBA at 50 feet.

Construction Equipment Noise Impacts

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction activities would include demolition, grading, building construction, paving, and architectural coating. The nearest off-site noise-sensitive land uses in the Proposed Project vicinity are multifamily residences located approximately 50 feet northwest of the Proposed Project boundary (see **Table 3.8-3**). For the modeled analysis, all construction equipment was assumed to operate at the same time to represent a worst-case scenario. Noise from localized point sources (such as construction sites) typically decreases by 6 dB to 7.5 dB with each doubling of the distance from source to receptor (FHWA 2023).

Table 3.8-9, **Estimated Construction Noise Levels,** identifies the noise level of each construction activity for five phases at the nearest off-site sensitive receptors. As shown, Proposed Project construction activities would result in a substantial temporary increase in ambient noise levels at nearby noise-sensitive land uses.

All five phases are assumed to use the same equipment during each type of construction activity. Predicted construction noise levels at off-site receptors for all phases would range from 69.6 dBA L_{eq} to 84.9 dBA L_{eq}. As stated in Santa Monica Municipal Code Section 4.12.110, "the noise created by construction activity shall not cause: (1) The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of this Chapter, for the noise zone where the measurement is taken, plus twenty dBA; or (2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of this Chapter for the noise zone where the measurement is taken plus forty dBA, for any period of time." As shown in **Table 3.8-9**, construction noise levels would exceed 20 dB above, the exterior equivalent noise threshold but not 40 dB above the exterior maximum instantaneous noise standards of 60 dB of 15-minute continuous measurement period and 65 dB of 5-minute continuous measurement period of Noise Zone I. As such, Mitigation Measure **MM NOI-1** would be implemented to reduce construction noise generated by the Proposed Project. ss than significant. With implementation of Mitigation Measure **MM NOI-1**, construction noise levels would not exceed 20 dB above the exterior equivalent noise standards; refer to **Table 3.8-8**. Furthermore, as previously mentioned, the City of Santa Monica Noise Code (Chapter 4.12) allows construction activity between the hours of 8:00 AM and 6:00PM 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, and no nighttime construction work is anticipated to occur.

Mitigation Measure **MM NOI-1** would be implemented to require the establishment of best management practices during the construction phase, including properly maintaining construction equipment, locating stationary equipment away from sensitive receptors, staggering high noise construction activities, scheduling high interior noise activities during off school hours, using temporary sound walls, and ensuring that equipment is properly muffled. With implementation of Mitigation Measure **MM NOI-1**, construction nose impacts would be reduced to less than significant.

TABLE 3.8-9
ESTIMATED CONSTRUCTION NOISE LEVELS

Phase	Activity	Nearest Sensitive Receptors to Construction Activities (feet)[a]	L_{max} at Nearest Receptors	L_{max} Exterior Construction Noise Standards	Exceed Standards?	L_{eq} at Nearest Receptors	L_{eq} at Nearest Receptors with Mufflers Installed (5 dBA reduction)	L_{eq} Exterior Construction Noise Standards	Exceed Standards?
1 to 5	Demolition	100	83.6	100 dBA L_{max} for 15-Minute Continuous Measurement Period 105 dBA L_{max} for 5-Minute Continuous Measurement Period[b]	No	80.4	75.4	80 dBA L_{eq} for 15-Minute Continuous Measurement Period 85 dBA L_{eq} for 5-Minute Continuous Measurement Period[b]	No
	Grading	80	80.9		No	80.9	75.9		No
	Construction	80	79.9		No	79.9	74.9		No
	Paving	60	87.9		No	84.9	79.9		No
	Painting	80	73.6		No	69.6	64.6		No

Source: Appendix J, Noise Data.
Note:
(a) Distances are measured from the closest sensitive receptor property line to the boundary of the construction activities for each phase, which may be greater than the distances between the closest sensitive receptor and the Proposed Project site boundary, as some construction activities would not occur up to the Project site boundary.
(b) For easier comparison, the 20 dBA above equivalent noise level and 40 dBA above maximum instantaneous noise level has been added to the 60 dBA and 65 dBA noise level shown in Table 3.8-7 (i.e., 20 dBA + 60 dBA = 80 dBA; 40 dBA +60 dBA = 100 dBA; 20 dBA + 65 dBA = 85 dBA; 40 dBA + 65 dBA = 105 dBA).

Construction Truck Noise Impacts

In addition to construction noise on-site, construction activities would cause increased noise along access routes to and from the site due to movement of equipment and workers, as well as haul trips. There would be a relatively high single-event noise exposure potential at a maximum level of 87 dBA L_{max} with trucks passing at 50 feet from sensitive receptors along roadway segments leading to the Proposed Project site. Based on construction estimates, it is anticipated that Proposed Project construction would generate a maximum of 11 hauling trips per day, 157 worker trips per day, and 22 vendor trips per day; refer to **Appendix D**. As a result, mobile source noise would increase along access routes to and from the Proposed Project site during construction, mainly along Montana Avenue. Per the California Department of Transportation (Caltrans) *Technical Noise Supplement to the Traffic Noise Analysis Protocol* (Caltrans 2013), a doubling of traffic volume would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear. The existing daily traffic volume at Montana Avenue and Lincoln Boulevard is 15,311 trips (City of Santa Monica 2021a). A total of 189 construction-related trips per day is not anticipated to double existing traffic volumes along Montana Avenue, and any increase in traffic noise levels would be imperceptible. Further, the City's Municipal Code Section 4.12.110 restricts the hours for construction activity to between 8:00 AM to 6:00 PM on Mondays through Fridays and 9:00 AM to 5:00 PM on Saturdays, with some exceptions for construction that the City deems to be in the public interest. The District may seek a noise permit from the City to authorize construction activity to begin at 7:00 AM on weekdays to expedite the construction phases. The permit would also allow construction workers to arrive on campus and begin prior to the arrival of students and require notification to persons occupying property within 500 feet of the proposed construction activity prior to commencing work under the permit. Upon compliance with the City's allowable construction hours, short-term haul truck noise impacts from construction traffic would be less than significant.

<u>Operation</u>

Operational noise generated by the Proposed Project would not substantially increase noise levels over existing conditions. The new construction and reconfiguration of the Roosevelt Elementary School would not increase student enrollment or increase the overall number of HVAC units on the buildings. Further, traffic generated by students, athletic, theatric, and community events that take place after normal school hours is not expected to increase. The Proposed Project would relocate and expand existing noise-generating facilities such as the basketball courts, soccer field, and parking lot. However, the distance between the nearest sensitive receptors and the proposed locations of the basketball courts, soccer field, and parking lot would be the same or less as that under existing conditions. As such, the noise level due to parking and sports activities would not increase over existing conditions with Proposed Project implementation. Additionally, per Section 4.12.030 of the Santa Monica Municipal Code, activities conducted on public parks, public playgrounds, and public or private school are exempt from noise laws and ordinances. Based on the information above, operational noise impacts as a result of the Proposed Project would be less than significant without mitigation.

<u>Mitigation Measures (Phase 1 through Phase 5)</u>

No single feasible mitigation measure can reduce all potential construction noise impacts to less than significant. However, a mitigation measure or combination of measures can reduce a specific significant construction noise event. Implementation of the following mitigation would ensure that construction-related noise levels are reduced to less than significant (i.e., below the Santa Monica standard of 20 dBA equivalent noise level).

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

- The construction contractor shall ensure that power construction equipment (including combustion or electric engines), fixed or mobile, shall be equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of construction of the Proposed Project. The combination of muffling devices and noise shielding shall be capable of reducing noise by at least 5 dBA from non-muffled and shielded noise levels. Prior to initiation of construction, the contractor shall demonstrate to the City that equipment is properly muffled, shielded, and maintained. All equipment shall be properly maintained to ensure that no additional noise due to worn or improperly maintained parts would be generated.

- The construction noise control plan shall depict the location of construction equipment storage and maintenance areas, and document methods to be employed to minimize noise impacts on adjacent noise-sensitive land uses.

- At least 15 days prior to commencement of construction, the District shall send notice regarding the Project construction schedule to property owners and occupants located within 500 feet of the Proposed Project grading limits. A sign, visible to the public, shall also be posted at the construction site. All notices and signs shall be reviewed and approved by the City of Santa Monica Public Works Department prior to mailing or posting and shall indicate the dates and duration of construction activities and provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.

- The construction contractor shall provide evidence that a construction staff member is designated as a Noise Disturbance Coordinator who shall be present on-site during construction activities. The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the City of Santa Monica Public Works Department. All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator.

- The Proposed Project applicant shall demonstrate to the satisfaction of the City of Santa Monica Public Works Department that construction noise reduction methods shall be used, including but not limited to, shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and the use of electric air compressors and similar power tools, to the extent feasible.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.

- To the extent feasible, haul routes shall be designed such that the routes do not pass sensitive land uses or residential dwellings.

- In compliance with Santa Monica Municipal Code Section 4.12.110, construction activities and haul truck deliveries shall only occur between the hours of 8:00 AM to 6:00 PM on Mondays through Fridays and 9:00 AM to 5:00 PM on Saturdays unless otherwise authorized. Construction activities shall be prohibited on Sundays and holidays.

Level of Significance

Recommended mitigation would reduce construction noise levels; however, it should be noted that construction operations are expected to result in a temporary or periodic increase in ambient noise levels in the Proposed Project vicinity above existing levels without the Project. Mitigation Measure **MM NOI-1** is required to reduce significant short-term impacts related to construction-generated noise. Therefore, impacts related to short-term construction-generated noise levels would be reduced to less than significant.

Threshold NOI-2 Generation of excessive groundborne vibration or groundborne noise levels.

Construction Vibration Impacts

Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Caltrans *Transportation and Construction Vibration Guidance Manual* (2020) identifies various vibration damage criteria for different building classes. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Per information in **Table 3.8-3,** the human reaction to levels of vibration ranges is measured from the lowest level of 0.006 to the highest level of 0.6 peak particle velocity (PPV). A groundborne vibration level of 0.006–0.019 PPV is considered a threshold of perception and the possibility of intrusion; level 0.08 vibrations are readily perceptible; and level 0.10 vibrations are continuous vibrations that begin to annoy people (Caltrans 2020). As construction-induced vibration is exempt from the City's Municipal Code Section 4.12.070, *Vibration,* this evaluation uses the Caltrans architectural damage threshold for continuous vibrations at residential buildings of 0.5 inch-per-second (in/sec) PPV and historic and some old buildings of 0.25 in/sec PPV.

The nearest structures are residential buildings located approximately 50 feet to the northwest of the proposed parking lot, the construction of which would use vibratory rollers. The nearest structures on-site are the historical buildings that would remain on-site with implementation of the Proposed Project. Typical vibration produced by construction equipment is illustrated in **Table 3.8-10, Typical Vibration Levels for Construction Equipment.** Based on the Federal Transit Administration (FTA) data, vibration velocities from typical heavy construction equipment operation that would be used during Project construction range from 0.035 to 0.210 in/sec PPV at 25 feet from the source of activity. The vibratory roller for the parking lot would generate the greatest vibration. The closest sensitive receptors to the proposed parking lot would be the multifamily residences located 50 feet northwest. At a distance of 50 feet, the vibratory roller would generate 0.098 in/sec PPV, which would not exceed the Caltrans threshold of 0.5 in/sec PPV. The proposed parking lot would be located at least 420 feet from preserved historic buildings on-site. At a distance of 420 feet, the vibratory roller would not generate over 0.25 in/sec PPV for historic structure. Other vibration-generated equipment, such as a small bulldozer and jackhammers, would be used during building construction and be as close as 5 feet to the nearest on-site historic building. However, at a distance of 5 feet, the vibration would range from 0.018 to 0.205 in/sec, which would not exceed the Caltrans threshold of 0.25 in/sec PPV for historic buildings. The loaded truck would be located on the nearby street, which would be at least 50 feet from the nearest on-site historical building. Groundborne vibration decreases rapidly with distance; therefore, short-term construction would not expose receptors to significant groundborne vibrations.

TABLE 3.8-10
TYPICAL VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate Peak Particle Velocity at 25 Feet (in/sec)[a]	Approximate Peak Particle Velocity at 5 Feet (in/sec)[a]	Approximate Peak Particle Velocity at 50 Feet (in/sec)[a]	Approximate Peak Particle Velocity at 420 Feet (in/sec)[a]
Vibratory Roller	0.210	--	0.098	0.009
Loaded trucks	0.076	--	0.036	0.003
Small bulldozer	0.003	0.018	0.016	<0.001
Jackhammer	0.035	0.205	0.014	0.002

Source: FTA 2006
Note:
Calculated using the following formula:

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$$

where: PPV (equip) = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV (ref) = the reference vibration level in in/sec from Table 12-2 of the FTA Transit Noise and Vibration Impact Assessment Guidelines
D = the distance from the equipment to the receiver

Operational Vibration Impacts

Operation of the Proposed Project would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. According to the FTA, it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. As such, it can be inferred that the Proposed Project would not create perceptible vibration-induced impacts to the nearest sensitive receptors. A less than significant impact pertaining to vibration would occur from Proposed Project operations.

Mitigation Measures

None required.

Level of Significance

Less than significant.

3.8.6 CUMULATIVE IMPACT ANALYSIS

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and significantly reduces in magnitude as the distance from the source increases. As such, only projects and growth due to occur in the immediate vicinity of the Proposed Project would be anticipated to contribute to a cumulative noise impact.

As shown in **Figure 3-1, Cumulative Projects,** and listed in **Table 3-1, Cumulative Projects List**, there are several related projects near the Proposed Project site. The potential for noise impacts to occur is specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network.

Construction Noise

Noise from construction of the Proposed Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from the construction site(s). The nearest existing sensitive/residential uses to the Proposed Project site that would be subject to cumulative noise impacts are residential uses located northwest, northeast, and southwest of the Proposed Project site.

Based on **Table 3-1**, there are 33 cumulative projects identified within the City of Santa Monica, but none of the cumulative projects are located within 500 feet of the Proposed Project site. Since the timing of the construction activities for these related projects cannot be defined and are beyond the control of the District, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative.

Thus, even with the proposed mitigation, if nearby related projects were to be constructed concurrently with the Proposed Project, a significant cumulative construction noise impact could result. However, those noise levels would be intermittent and temporary; would cease at the end of the construction phase; and would comply with time restrictions and other relevant provisions in the City's noise ordinance, as applicable. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual project and compliance with the City's noise ordinance. The Proposed Project would also implement Mitigation Measure **MM NOI-1** to reduce construction noise impacts to less than significant levels. Therefore, the Proposed Project's contribution to cumulative noise impacts would be less than significant.

Operation

Although related projects have been identified within the Proposed Project area, the noise generated by stationary equipment on-site cannot be quantified due to the speculative nature of each development. Nevertheless, each cumulative project would require separate discretionary approval and project-specific environmental analysis, which would address potential noise impacts and identify necessary attenuation measures, where appropriate. Additionally, as noise dissipates as it travels away from its source, noise impacts from stationary sources would be limited to each of the respective sites and their vicinities. Due to the distance and intervening structures, cumulative stationary noise impacts would not occur. As noted above, the Proposed Project would not result in significant stationary noise impacts that would significantly affect surrounding sensitive receptors. Additionally, as the Proposed Project would not increase student enrollment, there would be no increase in noise related to mobile noise (i.e., from increased vehicle trips). Thus, the Proposed Project and identified cumulative projects are not anticipated to result in a significant cumulative impact relative to operational noise in this regard.

Groundborne Vibration

Due to the rapid attenuation characteristics of groundborne vibration and the distance of the related cumulative projects to the Proposed Project site, there is no potential for a cumulative construction- or operational-period impact with respect to groundborne vibration. The Proposed Project would not contribute to a significant cumulative impact in this regard.

Mitigation Measures

Implement Mitigation Measure **MM NOI-1** (construction noise).

Level of Significance After Mitigation

Less than significant with mitigation incorporated.

This page intentionally left blank.

3.9 TRANSPORTATION

This section of the EIR evaluates potential transportation impacts that may result from construction and/or operation of the Proposed Project. The following discussion addresses the existing transportation conditions of the affected environment, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the Project, as applicable.

3.9.1 ENVIRONMENTAL SETTING

Surrounding Setting

Access to the school campus is provided by the surrounding roadway network, which includes Interstate 10 (I-10), State Route (SR) 1, San Vicente Boulevard, Lincoln Boulevard, Montana Avenue, 9th Street, and Alta Avenue.

Highways

The Roosevelt Elementary School campus is located in the mid-city neighborhood of the City of Santa Monica. The Santa Monica Freeway, I-10, provides east/west access across the City of Santa Monica to the City of Los Angeles, and also connects to the San Diego Freeway (I-405) and Pacific Coast Highway.

Street Network

The campus is bounded by Lincoln Boulevard to the southwest, Montana Avenue to the southeast, Alta Avenue to the northwest, and 9th Street to the northeast. These streets are described in greater detail below.

- **Montana Avenue** is designated as a pedestrian-oriented travel corridor that serves the local-serving commercial area in the Montana Avenue District. Montana Avenue consists of one lane in each direction, on-street parking, and a painted bike lane.

- **Alta Avenue, 9th Street, and Lincoln Boulevard** are designated as neighborhood streets, which provide access primarily to adjacent uses. Automobiles travel slowly enough to stop for pedestrians crossing the street. These streets consist of one travel lane in each direction and on-street parking.

Existing School Operations and Circulation

The main access to the school is provided along Montana Avenue; secondary access is provided along Lincoln Boulevard. In addition, access to the TK and kindergarten classrooms is provided on 9th Street. The surface parking lot located at the corner of 9th Street and Alta Avenue (north corner of the campus) provides staff parking, early education parking, and student drop-off/pickup.

The primary pedestrian entrance to the school is accessed through a path along Montana Avenue between Buildings J and H. Secondary pedestrian access is provided from Lincoln Boulevard via a path between Buildings D (cafeteria) and H (auditorium), located along Lincoln Boulevard in the southwestern portion of the site; this entrance historically served as the primary entrance to the school campus.

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 childcare, recreation, enrichment, sports together (CREST) and School Age Programs, which provide morning care and after-school childcare, do occur outside of normal school operating hours, typically before school and after school until 6:00 p.m.

Under current conditions, community use of school facilities typically occur following the end of operational 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.

As described in **Section 2.0**, **Project Description**, the Proposed Project would shift the overall design of the campus but 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 also not result in additional vehicle trips to and from the school during operations as 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. Overall, the total number of vehicle trips generated by school operations would not change with the Proposed Project.

3.9.2 REGULATORY SETTING

Federal

There are no federal regulations relating to transportation relevant to the Proposed Project.

State

Assembly Bill 1358

Assembly Bill (AB) 1358, known as the Complete Streets Act, was adopted in 2008. AB 1358 requires that, as of January 1, 2011, cities and counties, upon any substantive revision to their general plan circulation elements, plan for a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways, including motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation.

Senate Bill 375

Senate Bill (SB) 375 (codified in the Government Code and the Public Resources Code) took effect in 2008 and provides a new planning process to coordinate land use planning, regional transportation plans, and funding priorities in order to help California meet the greenhouse gas reduction goals established by Assembly Bill 32. Senate Bill 375 requires Metropolitan Planning Organizations (MPOs) to incorporate a Sustainable Communities Strategy (SCS) in their Regional Transportation Plans (RTPs) to achieve greenhouse gas emissions (GHG) reduction targets by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.

SB 375 required the California Air Resources Board (CARB) to set regional targets for reducing GHG from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each region in California governed by an MPO. Senate Bill 375 does not require CARB to set targets beyond 2035.

The Southern California Association of Governments (SCAG) adopted the *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020–2045 RTP/SCS), known as Connect SoCal 2024, in April 2024. The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHG emissions from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specifically, these strategies are:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the State-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center-focused placemaking and focus on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

The most recent 2024-2050 RTP/SCS was adopted by SCAG's Regional Council in April 2024. The 2024-2050 RTP/SCS sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures, and policies, will reduce GHG emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the CARB. In addition, the 2024-2050 RTP/SCS is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. While SCAG has adopted the 2024-2050 RTP/SCS, CARB has not yet certified it or approved SCAG's GHG emissions reduction calculations.

Senate Bill 743

SB 743 was signed into law in September 2013 and includes several changes to CEQA for projects located in areas served by transit (e.g., transit-oriented development, or TOD). Most notably with regard to transportation and traffic assessments, Senate Bill 743 changed the way that transportation impacts are analyzed under CEQA (see PRC § 21099). SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to exclude level of service (LOS) and auto delay when evaluating transportation impacts.

With implementation of SB 743, new criteria have been established to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. The *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Guidelines)* provided recommendations for updating the State's CEQA Guidelines in response to SB 743 and contained recommendations for a VMT analysis methodology in an accompanying *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory).

The *Guidelines*, including the *Technical Advisory*, recommended use of automobile VMT per capita as the preferred CEQA transportation metric, along with the elimination of automobile delay/LOS for CEQA purposes statewide. Public Resources Code section 21099 and CEQA Guidelines section 15064.3 reflect this change. Under Section 21099, automobile delay, as measured by LOS or similar measures of traffic congestion or vehicular capacity, is not considered a significant effect on the environment.

Regional

Regional Transportation Plan Sustainable Communities Strategy (2024-2050 and 2020-2045)

The RTP/SCS represents a long-range transportation planning document that is updated every three years in coordination with federal, State and other regional, subregional, and local agencies in Southern California.

As stated above, SCAG adopted its Connect SoCal 2024 RTP/SCS in April 2024. Connect SoCal 2024 outlines a vision for a more resilient and equitable future, with investment, policies, and strategies for achieving the region's shared goals through 2050. The RTP/SCS includes Regional Planning Policies intended to serve as a resource for County Transportation Commissions (CTCs) and local jurisdictions, who can refer to specific policies to demonstrate alignment with the RTP/SCS when seeking resources from State or federal programs. Such policies address complete streets; transit and multi-modal integration; transportation system and transportation demand management; technology integration; safety; housing and priority development areas; air quality, clean transportation, and climate resilience; goods movement; workforce development, and tourism, among other issues.

As stated above, the SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHG emissions from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels).

Local

Construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan. Per Government Code section 53094, on August 16, 2018, the Santa Monica-Malibu Unified School District (District) School Board passed Resolution No. 18-03, Exemption of the Santa Monica High School – Campus Plan from the City of Santa Monica Zoning Code, to exempt the Roosevelt Campus Plan from the Santa Monica General Plan and Zoning Ordinance provisions. As such, the discussion of the City's General Plan and Zoning Ordinance is provided below only as background information.

City of Santa Monica Municipal Code Article 9, Chapter 9.28, Section 140, Bicycle Parking

The Santa Monica Municipal Code (SMMC) requires all new development to provide a minimum number of bicycle parking spaces based on the primary uses of the site. Bicycle spaces must be provided for both short-term and long-term parking needs. For example, in accordance with SMMC Section 9.28.140, for public parks and recreation facilities, short-term bicycle parking spaces shall be required for 5 percent of the maximum daily attendance and one long-term bicycle space shall be provided per 20 employees. This section of the SMMC also requires bicycle parking to be provided in a safe, secured, well-lit, and accessible location on a project site with adequate signage.

City of Santa Monica General Plan – Land Use and Circulation Element

Adopted in 2010 and amended in 2023, the City's Land Use and Circulation Element (LUCE) outlines a long-term land use and transportation vision for Santa Monica. The LUCE includes a set of goals, policies, and standards to guide land use and transportation decisions in the City.

- **Goal LU15:** Enhance Santa Monica's Urban Form. Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.
  - **Policy LU15.5:** Pedestrian and Bicycle Connectivity. Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.
- **Goal T8.** Provide a beautiful and attractive pedestrian environment throughout the City.
  - **Policy T8.4.** Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.
- **Goal T24.** Provide adequate parking availability for commuters, visitors, and shoppers throughout the day.
- **Goal T25:** Design parking to meet applicable urban design goals and minimize negative impacts on pedestrians, bicyclists and transit users.
  - **Policy T25.1.** Require adequate on-site loading areas for childcare centers, healthcare offices, and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas.

Pedestrian Action Plan

Adopted in 2016, the City's Pedestrian Action Plan addresses pedestrian movement as part of the City's efforts in making planning and transportation decisions, promoting equity, and ensuring comfort for a range of users. The following goals and policies related to pedestrian safety are relevant to the Proposed Project (City of Santa Monica 2016).

- **Goal 1.** Vision Zero: The safety of people walking in Santa Monica is a shared responsibility.
- **Goal 2.** A Healthy Community: Streets and sidewalks are designed to promote the healthy, active and safe Santa Monica lifestyle.
- **Goal 3.** Community Compassion and Equity: Citywide investments foster a sense of community by supporting people of differing abilities and promoting social equity.

- **Goal 4.** Sustainability and Stewardship. More people walk in Santa Monica than ever before, which promotes environmental sustainability and stewardship of our natural resources.

- **Goal 5.** Walking as the First Choice. Santa Monica makes transportation, land use and building design decisions that make walking a logical first choice transportation option for those who are able.

- **Goal 6**. A Barrier-Free Network. Santa Monica has a pedestrian network that connects transit, bicycling and shared parking options. **Goal 7.** Pedestrian Awareness and Education: The community has a high awareness about safety, the benefits of walking for good health, and the viability of walking in Santa Monica.

- **Goal 8.** Coordinated City Efforts: City departments work together to improve conditions for walking.

Safe Routes to School

The Safe Routes to School (SRTS) program is aimed at improving the health and well-being of children by providing a safe environment that encourages school-aged children to walk, bike, and skate to school. The SRTS has two top priorities:

- Build safety improvements on neighborhood streets connecting students' homes to their school.

- Promote a culture in school communities that prioritizes safety, physical activity, and sustainable transportation.

The City's SRTS program is intended to make taking active transportation to school a customary part of everyday life and includes Bike It Walk It events each fall and spring, safety training for students and parents, outreach and events, and infrastructure improvements. According to the SRTS, improvements to the Montana Avenue/9th Street intersection were completed in November 2021 and involved the addition of curb extensions and improved pavement markings to enhance safety and pedestrian movements (Santa Monica 2023b).

3.9.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines as amended contains analysis guidelines related to the assessment of transportation impacts. These guidelines have been utilized as thresholds of significance for this analysis. A project would result in a significant impact if it would:

Threshold TR-1: ***Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.***

Threshold TR-2: ***Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).***

Threshold TR-3: ***Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).***

Threshold TR-4: Result in inadequate emergency access.

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, substantiates that impacts associated with the following thresholds would have less than significant impact:

Threshold TR-2: Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b).

Threshold TR-4: Result in inadequate emergency access.

Therefore, these criteria are not further evaluated in this EIR.

3.9.4 PROJECT DESIGN FEATURES

There are no Proposed Project design features for transportation.

3.9.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

The analysis of consistency reviews the Proposed Project and determines whether the Proposed Project would obstruct or conflict with applicable plans, programs, ordinances, and policies listed in the Regulatory Setting. In addition, the analysis evaluates whether the Proposed Project would result in hazards due to design features by determining whether the Project would include curved streets with inadequate view distances, have unsafe separation of vehicles and pedestrians or bicyclists, or not provide adequate pedestrian crosswalks at intersections.

The Proposed Project would reconfigure the existing Roosevelt campus, which would include removal of existing buildings, relocation of the on-site parking area, and other improvements. The Proposed Project would not result in an increase in student enrollment or capacity; therefore, the Roosevelt Campus Plan would not result in a change to external traffic patterns and circulation in and around the campus.

Impact Analysis

This analysis evaluates anticipated changes in the physical environment resulting from construction and operation of the Proposed Project against the thresholds of significance identified herein, to determine if direct and indirect changes from existing conditions would constitute potentially significant effects. Project changes are described and potential impacts, if any, are identified under each impact discussion. Where impacts would be considered potentially significant, mitigation measures are identified to reduce impacts to a less than significant level.

Threshold TR-1: Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Proposed Project would result in the modernization and redevelopment of the existing Roosevelt Elementary School campus. The proposed improvements would not result in an increase in student capacity or staffing levels in the school and, therefore, would not result in an increase of vehicle trips following buildout of the proposed Campus Plan.

As part of developing a SCS per SB 375, SCAG must include a "forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies…" will enable SCAG to reach its per capita passenger vehicle GHG emission reduction target of 19 percent below 2005 levels by 2035. Construction and operation of the Proposed Project would not prohibit or interfere with per capita reduction targets or associated reduction in VMT per capita as identified in the RTP/SCS. As the Proposed Project would operate in the same capacity as existing conditions, it would not conflict with the Connect SoCal 2024 RTP/SCS intent of maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together; increasing investments in transit and complete streets; improving safety; and addressing air quality, clean transportation, and climate resilience, among other issues. Therefore, the Proposed Project would be consistent with the SCAG RTP/SCS.

Santa Monica General Plan

The Proposed Project does not include improvements that would alter any existing public roadways in the vicinity of the school campus. As shown in **Table 3.9-1**, the Proposed Project would be consistent with the intent of relevant goals and policies from the City of Santa Monica's General Plan.

TABLE 3.9-1
CONSISTENCY WITH GOALS AND POLICIES ADDRESSING THE CIRCULATION SYSTEM

Policy	Consistency
Goal LU15: Enhance Santa Monica's Urban Form. Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.	**Consistent.** The Proposed Project includes improvements to the existing elementary school campus to provide larger classrooms, new extracurricular facilities, and adequate support infrastructure that would better serve current and future students attending the school and provide educational facilities that align with the Districtwide Education Specifications adopted by the District Board. The improvements would not increase the capacity of the school, nor result in a related increase in traffic generation on surrounding streets. The Proposed Project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Alta Avenue, 9th Street, Montana Avenue, and Lincoln Boulevard. Additionally, the Proposed Project would include pedestrian access points to the campus along Montana Avenue (via main entry), Lincoln Boulevard (via community lawn and outdoor stage area), and 9th Street (via loading area and pickup/drop-off entry). Therefore, operations at the school would remain compatible with the surrounding neighborhoods. No off-site improvements are proposed that would interfere with pedestrian movement.

TABLE 3.9-1, CONTINUED

Policy	Consistency
Policy LU15.5: Pedestrian and Bicycle Connectivity. Encourage the design of sites and buildings to facilitate easy pedestrian- and bicycle-oriented connections and to minimize the separation created by parking lots and driveways.	**Consistent.** The existing 48-space parking lot would be relocated to the northern boundary of the campus along the span of Alta Avenue to efficiently use the northern portion of the campus (unless reconstructed as a below-grade lot under the playfield). Although the parking lot may serve as a drop-off area for students, the Proposed Project would include entryways for students to the Roosevelt campus along Montana Avenue, Lincoln Boulevard, and 9th Street to facilitate arrival by foot or bicycle. Each school entry point would include a security gate to control access and ensure student safety.
Goal T8. Provide a beautiful and attractive pedestrian environment throughout the City.	**Consistent.** The Proposed Project would not include off-site enhancement that would interfere with the City's established pedestrian circulation system or detract from being an attractive pedestrian environment. The Proposed Project would provide student entryways to the Roosevelt ES campus along Montana Avenue, Lincoln Boulevard, and 9th Street. Each school entry point would include a security gate to control access and ensure student safety.
Policy T8.4. Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.	**Consistent.** Refer to Goal T8, above.
Goal T24. Provide adequate parking availability for commuters, visitors and shoppers throughout the day.	**Consistent.** The existing 48-space parking lot would be relocated to the northern boundary of the campus along the span of Alta Avenue to efficiently use the northern portion of the campus and increase the parking capacity by 19 spaces (for a total of 67 spaces) to meet existing needs. The parking lot may potentially be reconstructed as a below-grade lot under the playfield, which would result in a 117-space increase in campus parking (for a total of 165 spaces). All parking proposed would be adequate to accommodate anticipated parking demands generated with school operations.
Goal T25: Design parking to meet applicable urban design goals and minimize negative impacts on pedestrians, bicyclists, and transit users.	Consistent. Refer to Goal T24, above.
Policy T25.1. Require adequate on-site loading areas for childcare centers, healthcare offices and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas.	**Consistent.** The Proposed Project would construct new areas for students involving: • separate drop-off/pickup for the transitional kindergarten/kindergarten students along 9th Street, • creation of a main entryway to the school campus along Montana Avenue, • construction of a community lawn at the intersection of Montana Avenue and Lincoln Boulevard, and • relocation of the existing 48-space parking lot to the north-northwest portion of the campus, along with increasing capacity to meet existing needs (either through additional surface parking or construction of a below-grade lot; refer to Goal T24, above).

The Proposed Project would not adversely affect any existing or planned transit, bicycle, or pedestrian facilities. Additionally, because the Proposed Project would not increase enrollment or capacity, there would not be an increase in demand for these facilities. The Proposed Project would not substantially alter current travel patterns or pedestrian activity already experienced and planned for under existing conditions.

Santa Monica Municipal Code

The Proposed Project would comply with the standards and requirements set forth in the SMMC. Specifically, the Proposed Project would comply with Chapter 9.28, Parking, Loading, and Circulation, with reconfiguration of the existing parking lot on the school campus. The existing 48-space parking lot would be relocated to the northern boundary of the campus along the span of Alta Avenue to efficiently use the northern portion of the campus and increase the parking capacity by 19 spaces (for a total of 67 spaces) to meet existing needs. The parking lot may potentially be reconstructed as a below-grade lot under the playfield, which would result in a 117-space increase in campus parking (for a total of 165 spaces). The additional parking proposed would be adequate to meet identified shortages for the school's existing needs. The Proposed Project would not conflict with the SMMC.

Pedestrian Action Plan

The Proposed Project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Alta Avenue, 9th Street, Montana Avenue, and Lincoln Boulevard. Additionally, the Proposed Project would include pedestrian access points to the campus along Montana Avenue (via main entry), Lincoln Boulevard (via community lawn and outdoor stage area), and 9th Street (via loading area and pickup/drop-off entry). As described below, the Proposed Project would not conflict with the Pedestrian Action Plan. The goals of the Pedestrian Action Plan are:

- **Goal 1**: Vision Zero: The safety of people walking in Santa Monica is a shared responsibility.

  The City's SRTS program would provide pedestrian safety near the Roosevelt campus. If the City decides to modify any pedestrian accessways under the SRTS program around the campus, the District will coordinate with the City for SRTS implementation.

- **Goal 2**: A Healthy Community. Streets and sidewalks are designed to promote the healthy, active and safe Santa Monica lifestyle.

  The Proposed Project would be confined to the Proposed Project's site and would not modify the surrounding circulation network, including roads and pedestrian facilities.

- **Goal 3**: Community Compassion and Equity: Citywide investments foster a sense of community by supporting people of differing abilities and promoting social equity.

  As stated, the Proposed Project would be confined to the Proposed Project's site and would not modify the surrounding circulation network, including roadways and pedestrian facilities. All proposed improvements would be designed to meet the Americans with Disabilities Act and the California Department of General Services, Division of the State Architect requirements, as applicable.

- **Goal 4**: Sustainability and Stewardship. More people walk in Santa Monica than ever before, which promotes environmental sustainability and stewardship of our natural resources.

  The Proposed Project would modernize the existing Roosevelt ES campus, which currently serves the surrounding community. The Proposed Project would continue to serve the local community residents and would not construct in or modify the surrounding circulation network, including roads and pedestrian facilities. The Proposed Project would not alter attendance boundaries, thus resulting in increased walking distances.

- **Goal 5**: Walking as the First Choice. Santa Monica makes transportation, land use and building design decisions that make walking a logical first choice transportation option for those who are able.

  The Proposed Project would be consistent with this goal and would not modify the surrounding circulation network, including roadways and pedestrian facilities. The Proposed Project does not include improvements that would inhibit students or parents from walking to and from the school, or that would create unsafe conditions that would discourage pedestrian activity. It is anticipated that students living within a reasonable walking distance of the school would continue to access the campus on foot, similar to that which occurs under existing conditions.

- **Goal 6**: A Barrier-Free Network. Santa Monica has a pedestrian network that connects transit, bicycling, and shared parking options.

  The Proposed Project would be consistent with this goal. See Goals 1 through 5.

- **Goal 7**: Pedestrian Awareness and Education. The community has a high awareness about safety, the benefits of walking for good health, and the viability of walking in Santa Monica.

  The Proposed Project would be consistent with this goal. and would improve pedestrian circulation and safety on campus. All proposed improvements would be designed to meet Americans with Disabilities Act and California Department of General Services, Division of the State Architect, requirements to ensure adequate onsite circulation and access are provided. Additionally, the proposed campus plan has been designed to consolidate the number of pedestrian access points into the school campus, thereby enhancing overall student and visitor safety. Further, each school entry point will include a security gate to control access. As appropriate, the District will also continue to coordinate with the City if the City implements the SRTS program near the Roosevelt campus to encourage the viability of walking within the surrounding neighborhoods; however, no offsite improvements are currently proposed with the Proposed Project.

- **Goal 8**: Coordinated City Efforts. City departments work together to improve conditions for walking.

  The District will continue to coordinate with the City during City implementation of SRTS; however, the Proposed Project would not construct in or modify the surrounding circulation network, including roads and pedestrian facilities, that would result in enhanced SRTS. As offsite improvements are not proposed, no conflicts with the SRTS or other programs aimed at enhancing the pedestrian network would result with implementation of the Proposed Project.

<u>**Safe Routes to School**</u>

As stated earlier, several improvements were previously implemented at an intersection adjacent to the school as part of the City's SRTS program to enhance student safety and pedestrian circulation. Future improvements planned for the school campus with the Proposed Project would not conflict with the goals of the City's SRTS program of enhancing the safety of neighborhood streets and providing connection between students' homes and schools, or of promoting a culture that prioritizes safety, physical activity, and sustainable transportation. All proposed improvements would be confined to the Proposed Project's Site and would not construct in or modify the surrounding circulation network, including roads and pedestrian facilities. As such, the Proposed Project would not conflict with a program, plan, ordinance, or policy regarding public transit, roadway, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Impacts would be less than significant.

Mitigation Measures

None required.

Level of Significance

Less than significant.

Threshold TR-3: ***Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).***

Construction

Construction of the Proposed Project would occur over five phases beginning in the summer of 2025 and ending in the summer of 2034. Construction activities would involve demolition, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, landscaping, and parking lot improvements. All construction staging would be located within the boundaries of the existing campus. Construction of the Proposed Project would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to and from the campus, as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the campus would require the use of oversized vehicles that may travel at slower speeds than existing traffic. Construction traffic would be scheduled in concert with operations at the school, ensuring that trucks are not moving in or out during student drop-off or pickup times. it is anticipated that construction activities would intensify during the summer months and outside of regular school hours when class is not in session.

Construction activities would require the hauling of heavy equipment (e.g., bulldozers, excavators) and operation of large trucks on the surrounding roadway network. Some of the roadways surrounding the campus (e.g., Alta Avenue) have limited lane widths and sharp curves at intersections. Haul trips and equipment deliveries often use large trucks, which could temporarily cause hazards, such as sudden stops and queuing, on these roadways. Additionally, construction could require temporary closures of the public right-of-way adjacent to the campus or increase safety hazards as a result of construction vehicles entering or exiting the campus. Therefore, this impact is considered potentially significant.

During construction of the Proposed Project, implementation of Mitigation Measure **MM TR-1** would require the construction contractor to prepare and implement a Construction Management Plan to address safety hazards including, but not limited to, avoidance of construction staging and delivery during off-peak pickup/drop-off times, which would reduce the temporary impact.

Additionally, construction traffic impacts would be localized and temporary and would not introduce a permanent hazardous condition to the local roadways. Therefore, with the implementation of Mitigation Measure **MM TR-1**, construction of the Proposed Project would not substantially increase hazards due to a design feature or incompatible use. Impacts during construction would be reduced to less than significant.

Operation

Drop-off/pick-up logistics under existing conditions are described below (Michael Baker International 2024):

- ***Montana Avenue*** - Metered on-street parking is provided along the site frontage and is the roadway is often congested during drop-off/pick-up times. There are no existing curb cuts and none are proposed with the Proposed Project improvements. Drop-off and pick-up along Montana Avenue are discouraged with exception of late students.

- ***9Th Street*** - Drop-off and pick-up along 9th Street is reserved exclusively for the TK and Kindergarten classes.

- ***Lincoln Boulevard*** - Approximately 320 feet of curb space is reserved for drop-off and pick-up in front of the access on Lincoln Boulevard similar to existing conditions. The remaining curb space (approximately 450 feet) is allocated to on-street parking.

- ***Alta Avenue*** - On-street parking is allowed along on Alta Avenue the site frontage and limited student drop off is anticipated.

Such operations along the surface streets adjacent to the school would remain unchanged with the Proposed Project. As noted, the proposed improvements would not increase the capacity of the school, nor result in a related increase in traffic generation on surrounding streets. The Proposed Project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Alta Avenue, 9th Street, Montana Avenue, and Lincoln Boulevard. Additionally, the Proposed Project would include pedestrian access points to the campus along Montana Avenue (via main entry), Lincoln Boulevard (via community lawn and outdoor stage area), and 9th Street (via loading area and pickup/drop-off entry). As such, operations at the school would remain compatible with the surrounding neighborhoods. No off-site improvements are proposed that would interfere with pedestrian movement or safety.

Vehicular circulation, pick-up/drop-off logistics, and pedestrian access are forecast to operate similarly to existing conditions and would not be significantly affected by the Proposed Project. The Proposed Project would not substantially increase hazards due to a design feature or incompatible uses. Impacts would be less than significant.

Mitigation Measures

MM TR-1 Before the start of construction of phase, the Santa Monica-Malibu Unified School District shall work with the City of Santa Monica Public Works Department to develop and implement a Construction Management Plan that is specific to the needs of each phase. The Construction Management Plan shall include a Temporary Traffic Control Plan (TTCP) to address anticipated impacts to or closures of public rights-of-way. The Construction Management Plan (including the TTCP) shall be submitted to the City Public Works Department for approval prior to construction of each phase of the Proposed Project. The TTCP shall demonstrate appropriate traffic handling during construction activities for all work that could impact the traveling public (e.g., the transport of equipment and materials to the campus area). The TTCP shall minimize hazards through industry-accepted traffic control practices. At a minimum, the TTCP shall require the contractor to do the following:

- Strictly adhere to the construction noise restrictions per Section 4.12.110 of the Santa Monica Municipal Code. Construction and demolition work times are as follows: Monday through Friday, 8:00 a.m. until 6:00 p.m.; Saturdays, 9:00 a.m. until 5:00 p.m.; and no construction or demolition allowed on Sundays and holidays.

- Obtain transportation permits necessary for oversized and overweight load haul routes and follow regulations of the applicable jurisdiction for transportation of oversized and overweight loads;

- Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if deliveries could preclude free flow of traffic in both directions or cause a temporary traffic hazard; prohibit deliveries of heavy equipment and construction materials during periods of heavy traffic flow (i.e., 30 minutes before or after school start and end times);

- Develop a Traffic Education Program to educate parents, students, and staff on drop-off/pickup procedures specific to each phase of construction, which includes informational materials regarding student drop-off and pickup procedures via regular parent/school communication methods and posted on the school website;

- Utilize portable message signs and information signs at construction sites as needed;

- Coordinate with the responsible agency departments, including the City of Santa Monica Public Works and Planning Departments, and the City of Santa Monica Fire Department no less than 10 days prior to the start of the work for each phase, including specifying whether any temporary vehicle, pedestrian, or bicycle construction detours are needed, if construction work would encroach into the public right-of-way, or if temporary use of public streets surrounding the campus is needed; and

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

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

Level of Significance After Mitigation

Recommended mitigation would require preparation and implementation of a Construction Management Plan to address potential safety hazards during the construction phase. Impacts regarding increased hazards due to a design feature or incompatible uses would be less than significant with implementation of Mitigation Measure **MM TR-1**.

3.9.6 CUMULATIVE IMPACT ANALYSIS

Temporary and short-term construction-related traffic impacts associated with the Proposed Project would be related to truck routes and construction area access routes used by Project workers and material haulers, as well as potential increased traffic safety hazards. In conjunction with other projects occurring within the Project area, significant cumulative impacts could occur if construction activities for those other projects (e.g., truck and worker trip-generating activities) were to overlap in time and place with the Proposed Project. The Proposed Project would require implementation of Mitigation Measure **MM TR-1**, requiring a Temporary Traffic Control Plan to be prepared for review and approval prior to construction activities. The plan would be required to show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The District would encourage its contractor to limit construction-related trucks to off-peak commute periods (i.e., schedule vehicle trips for times when other vehicles would not be on the road) to avoid potential cumulative impacts. As such, the Proposed Project's contribution to any transportation-related cumulative impacts during construction would be reduced to less than significant through mitigation and would not be cumulatively considerable.

As discussed, the Proposed Project would not conflict with applicable plans related to transportation or the circulation system. As shown in **Figure 3-1**, **Cumulative Projects**, none of the cumulative projects considered are within a one-half mile radius of the Roosevelt campus. Therefore, due to distance and the fact that the Proposed Project would not result in any off-site improvements, it is not anticipated that the Proposed Project would combine with other area projects to result in a potential adverse effect on surrounding roadways or pedestrian or bicycle facilities, or on public safety. Further, the Proposed Project would not result in any change in school operations (i.e., due to increased student capacity) that would generate additional traffic or congestion along local roadways that may create unsafe conditions for vehicle, pedestrian, or bicycle movement.

Similarly, other cumulative projects would be required to demonstrate conformance with applicable regulations and relevant plans related to the circulation system to ensure compatibility and minimize potential adverse effects. As such, the Proposed Project is not anticipated to contribute to a cumulative effect as the result of conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Mitigation Measures

Implement Mitigation Measure **MM TR-1**.

Level of Significance After Mitigation

Less than significant.

This page intentionally left blank.

3.10 TRIBAL CULTURAL RESOURCES

The purpose of this section is to assess the potential for existing tribal cultural resources within and around the Proposed Project site and to assess the significance of such resources. The following discussion addresses conditions of the affected environment related to tribal cultural resources; analyzes potential environmental impacts; and recommends measures to reduce or avoid significant adverse impacts anticipated from Proposed Project implementation, as applicable.

The analysis in this section is primarily based on the Roosevelt Elementary School Campus Plan Project Initial Study (September 2023) and results of Santa Monica-Malibu Unified School District (SMMUSD) notification efforts, pursuant to Assembly Bill (AB) 52 requirements.

3.10.1 ENVIRONMENTAL SETTING

Tribal cultural resources are defined by the Public Resources Code (PRC) section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be tribal cultural resources if they meet these criteria.

According to the City's Draft Environmental Impact Report 6th Cycle 2021-2029 Housing Element Update, the City of Santa Monica is located within the traditional Takic-speaking Gabrieleño/Tongva territory, which covered more than 1,500 square miles and consisted of mountain, foothill, prairie, coastal zone, and island environments. The Gabrieleño/Tongva territory was centered within the Los Angeles Basin, extending south into Orange County, as far east as the San Bernardino-Riverside area, and north to Topanga Canyon. In addition, the Gabrieleño/Tongva territory included the southern Channel Islands of Santa Catalina, San Clemente, and San Nicolas islands. However, most of the territory consisted of board coastal plains and several board inland valleys with a warm climate similar to that of the Mediterranean. More than 50 villages consisting of approximately 50 to 150 individuals were located within this territory, each of which consisted of one or more lineages that maintained permanent geographical territories that included a primary community settlement, various hunting and gathering areas, ritual sites, and other special use locations. During the Gabrieleño/Tongva times, access to water was provided by three major river systems and numerous streams and tributaries which flowed throughout the year (City of Santa Monica 2021).

Permanent settlements were generally located near intersections of two or more environmental zones, including prairie-foothill, elevated locations near major watercourses, and coastal sites near sheltered bays and inlets. The mainland territory included four distinct geographical regions, including the interior mountains and adjacent foothill region (including the Santa Ana, San Gabriel, and Santa Monica ranges) which provided various food sources such as numerous small animals, deer, acorn, sage, and piñon nuts. The prairie region flanking the interior mountain ranges (including the San Fernando, San Gabriel, and San Bernardino Valleys, and a greater portion of the Los Angeles-Santa Ana Plain), which provided food sources such as acorns, sage, yucca, deer, numerous small rodents, cactus fruit, various plants and small animal and bird species associated with freshwater marshes. The coastal region, which provided food sources in the form of shellfish, rays, sharks, and fish; and a sheltered coast region consisting of a coastal strip between San Pedro to Topanga Canyon, which provided similar food sources as the coastal region, as well as other sea mammals, deep-water fish, and sea birds (City of Santa Monica 2021).

The primary community settlements of the Gabrieleño/Tongva people, particularly larger settlements, functioned as political, legal, administrative, and ritual centers while some functioned as focal points for regional trade activities (City of Santa Monica 2021). Due to intensive development of the area and loss of archaeological sites that may have existed, only limited information about these early cultures is available. However, archaeological remains have been found at approximately forty locations in Los Angeles County including sites in the west Los Angeles area and several of the Channel Islands including San Clemente, Santa Catalina, and San Nicholas (City of Santa Monica 2002).

The current Roosevelt Elementary School campus was developed in 1935 and was situated within an area that had experienced intensive residential development since the 1920s. Two additional classroom buildings were constructed in 1940, and by the post-World War II years, sporadic development along the western border of the campus was completed. In 1951, several buildings, including the cafeteria and auditorium were designed and constructed to reorient the school's primary entrance to Lincoln Boulevard. By 1968, the original cafeteria was demolished, a new library was built, and an existing classroom was expanded. By the 1990s, a mix of permanent and temporary buildings and support structures were added to the campus to accommodate additional needs (Historic Resources Group 2022). As such, the site has been previously disturbed by prior grading, construction, and use.

No known resources identified as tribal cultural resources, as defined in PRC section 21074, have been identified within the Roosevelt Elementary School campus area. No tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, are known within the existing campus boundaries. Refer also to **Section 3.3**, **Cultural Resources**, for additional discussion of the on-site setting.

In accordance with AB 52 and PRC section 21080.3.1, SMMUSD sent formal notification letters to consult with two Native American tribes that have requested notification from the District. The notification letters were 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 notification 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. The SMMUSD has not received any responses from the Native American tribes contacted. Therefore, consultation was not required and did not take place.

3.10.2 REGULATORY SETTING

Federal

Archaeological Resources Protection Act (ARPA) of 1979

The ARPA was signed into law on October 31, 1979 and amended in 1988. The ARPA was enacted to protect archaeological resources and sites on public lands and Indian lands and governs the removal and disposition of archaeological resources from those sites.

National Register of Historic Places

The National Register of Historic Places (National Register) was established by the National Historic Preservation Act (NHPA) of 1966, as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment (CFR 2023)." The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes.

Native American Graves Protection and Repatriation Act (NAGPRA)

The NAGPRA was enacted in 1990, and provides a process for returning human remains, funerary objects, sacred objects, or objects of cultural patrimony found on Federal or Tribal lands to Native American and Alaska Native Tribes and Native Hawaiian organizations.

State

Assembly Bill 52

On September 25, 2014, Governor Jerry Brown signed into law AB 52. The act amended PRC section 5097.94, and added PRC sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a NOP or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) was filed on or after July 1, 2015. In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of AB 52 to:

1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
2. Establish a new category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
3. Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
4. Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources.
5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible

point in CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision making body of the lead agency.

6. Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.
7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflicts in the environmental review process.
8. Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
9. Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

Pursuant to AB 52, the lead agency is required to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of a 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 proposed projects in 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 (PRC, § 21080.3.1[d]). As part of the consultation process, the Native American tribe may among other comments, propose mitigation measures to avoid or reduce potentially significant impacts to tribal cultural resources.

California NAGPRA (CalNAGPRA)

Enacted in 2001, the CalNAGPRA covers gaps in the federal NAGPRA specific to the State of California. In 2020, AB 275 was passed to facilitate the implementation of the Federal NAGPRA, encourage voluntary disclosure and return of remains and cultural items by an agency or museum, and strengthen the CalNAGPRA for non-federally recognized California Native American tribes and elevate the status of tribal traditional knowledge in determining cultural affiliation and identifying cultural items.

California Register of Historical Resources (CRHR)

Created in 1992 by the State Legislature, the CRHR is an authoritative guide in California to be used by State and local agencies, private groups, and citizens “to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (Office of Historical Preservation, 2023). Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys, or designated by local landmarks programs, may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the criteria modeled on the NRHP criteria.

Health and Safety Code section 7050.5

The discovery of human remains is regulated by the California Health and Safety Code section 7050.5, which states:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation until the coroner has determined that the remains are not subject to…provisions of law concerning investigation of 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. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Public Resources Codes

PRC section 5097.5

PRC section 5097.5 provides protection for tribal resources on public lands, and states, in part, under 5097.5(a):

> No person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological, or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

PRC section 5097.98

PRC section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC section 5097.98 further requires the NAHC, upon notification by a County Coroner, to designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. In addition, landowners are required to discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

PRC sections 5097.9 to 5097.991

PRC sections 5097.9 to 5097.991, related to sacred sites, provide protection of Native American free speech, historical and cultural resources, and sacred sites, and identify the powers and duties of the NAHC. In addition, they require notification to descendants of discoveries of Native American human remains and provide a means for treating or disposing, with appropriate dignity, discovered human remains and any associated grave goods.

Local

City of Santa Monica

The City of Santa Monica formally initiated a historic preservation program with its 1976 adoption of the Landmark and Historic Preservation Ordinance. This ordinance established the Landmarks Commission whose powers include designation of structures of merit and landmarks, and recommendation to the City Council for the designation of historic districts. Furthermore, it identified both obligations required of historic property ownership and a broad range of incentives available to owners of historic properties.

Section 9.56.100 of the City of Santa Monica Landmark and Historic Preservation Ordinance authorizes the Landmarks Commission to designate landmarks or historic districts. A geographic area or a noncontiguous grouping of thematically related properties may be designated a historic district by the City Council. An individually significant property may be designated a landmark. Such designations may be made provided that the subject property (or properties) meets one or more of the following criteria:

- 9.56.100(a)(1). It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.
- 9.56.100(a)(2). It has aesthetic or artistic interest or value, or other noteworthy interest or value.
- 9.56.100(a)(3). It is identified with historic personages or with important events in local, state or national history.
- 9.56.100(a)(4). It embodies distinguishing architectural characteristics valuable to a study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.
- 9.56.100(a)(5). It is a significant or a representative example of the work or product of a notable builder, designer or architect.
- 9.36.100(a)(6). It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

3.10.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the CEQA Guidelines contains analysis guidelines related to the assessment of tribal cultural resources. These guidelines have been used as thresholds of significance for this analysis. A project would result in a significant impact if it would:

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:

Threshold TCR-1: ***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***

Threshold TCR-2: ***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.***

Criteria Requiring No Further Evaluation

The Initial Study, included as **Appendix A**, concluded that impacts associated with tribal cultural resources may be potentially significant, depending on the results of the AB 52 Native American tribal notification/consultation process, which was in process at the time the NOP was published. The AB 52 Native American tribal notification consultation process has since completed and, therefore, the Proposed Project was evaluated in this EIR using the above thresholds.

3.10.4 PROJECT DESIGN FEATURES

There are no specific Proposed Project design features applicable to tribal cultural resources.

3.10.5 IMPACT STATEMENTS AND MITIGATION DISCUSSION

Methodology for Analysis

Evaluation of the Proposed Project's potential impact on tribal cultural resources is based on the Roosevelt Elementary School Campus Plan Project Initial Study and SMMUSD AB 52 notification documentation. Refer to **Appendix A** of this EIR.

This analysis evaluates anticipated changes in the physical environment resulting from the Proposed Project against the thresholds of significance identified above to determine if direct and/or indirect changes from existing conditions would constitute a potentially significant effect. Proposed Project changes are evaluated and potential impacts, if any, are identified under the impact discussion. Where impacts would be considered potentially significant, mitigation measures are identified to reduce impacts to a less than significant level.

Thresholds TCR-1 and TCR-2	***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:*** ***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 determined by the lead agency, in its discretion and supported by substantial evidence, to be a tribal cultural resource, after applying the criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.***

The Proposed Project would result in demolition of existing facilities (six buildings and 12 portables); new construction (five new buildings and one building addition); and renovation (three buildings and outdoor areas) activities on the elementary school campus. However, as previously stated, no known resources within the campus area were identified as tribal cultural resources as defined in PRC section 21074 and there are no known tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources within the campus boundaries. In addition, the Project Site has been extensively disturbed by prior grading, construction, and use related to the campus' development history from the 1930s through the 1990s, which would have likely destroyed any tribal cultural resources that may have existed on the site.

Further, consultation with Native American tribes pursuant to AB 52 did not occur. Tribal notification for the Proposed Project was formally initiated on August 24, 2023; however, no responses have been received to date from the Native American tribes contacted. As no Native American tribes have responded and no consultation has been requested or conducted, and due to the highly disturbed nature of the site, it is not anticipated that tribal cultural resources would be encountered during construction-related ground disturbing activities. However, the Proposed Project would be required to comply with applicable state, federal, and local regulations concerning tribal cultural resources, including the discovery of previously unknown human remains. Refer also to **Section 3.3**, **Cultural Resources**, for an evaluation of Proposed Project impacts on historic and/or cultural resources and identification of mitigation measures, as appropriate, to reduce such impacts on known and/or unknown resources to less than significant.

Mitigation Measure

No mitigation measures are required.

Level of Significance After Mitigation

Impacts related to tribal cultural resources would be less than significant; therefore, no mitigation measures are required.

3.10.6 CUMULATIVE IMPACT ANALYSIS

There are no known tribal cultural resources that are listed in or eligible for listing in the California Register or a local register of historical resources present within the campus boundaries. No tribal cultural resources that could be impacted by the Proposed Project have been identified by the SMMUSD through tribal cultural resources identification efforts.

Many past, present, and foreseeable projects have affected, or will affect, tribal cultural resources throughout the region. However, because there are no known tribal cultural resources that are listed in or eligible for listing in the California Register or a local register of historical resources identified within the campus boundaries; because there was no response from Native American tribes traditionally and culturally affiliated with the geographic area; and because it is not anticipated that tribal cultural resources would be encountered during construction-related ground disturbing activities, the Proposed Project would not considerably contribute to a significant cumulative impact on tribal cultural resources. Additionally, all projects in the vicinity would be required to comply with applicable state, federal, and local regulations concerning tribal cultural resources and AB 52 notification requirements, as applicable. As a result, the Proposed Project would not contribute to a significant cumulative impact on tribal cultural resources as the result of unanticipated discoveries. Impacts would not be cumulatively considerable.

Mitigation Measures

Impacts related to thresholds would be less than significant; therefore, no mitigation measures are required.

Level of Significance

Cumulative impacts related to tribal cultural resources would be less than significant.

This page intentionally left blank.

4.1 INTRODUCTION

This Chapter presents the alternatives analysis for the Roosevelt Elementary School Campus Plan Project (Proposed Project), as required by the California Environmental Quality Act (CEQA). The discussion includes an explanation of the methodology used to select alternatives to the Proposed Project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the Proposed Project while still meeting most of the basic Project objectives. This Chapter identifies a reasonable range of alternatives that meet these criteria and evaluates the environmental effects of these alternatives as compared to those of the Proposed Project. This Chapter also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration, along with the reasons for their elimination. Finally, as required under CEQA Guidelines section 15126.6(e), based on this analysis, this Chapter identifies the Environmentally Superior Alternative.

4.2 GENERAL CEQA REQUIREMENTS

CEQA requires that an environmental impact report (EIR) include a discussion on a reasonable range of project alternatives that would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives" (CEQA Guidelines, § 15126.6).

Key provisions of the CEQA Guidelines on alternatives (§§ 15126.6[a] through [f]) are summarized below to explain the foundation and requirements for the alternatives analysis in the EIR.

> The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (Id. § 15126.6[b]).
>
> The specific alternative of "no project" shall also be evaluated along with its impact (Id. § 15126.6[e][1]).
>
> The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Id. § 15126.6[e][2]).
>
> The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project (Id. § 15126.6[f]).
>
> Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or

otherwise have access to the alternative site (or the site is already owned by the proponent) (Id. § 15126.6[f][1]).

[For alternative locations] Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (Id. § 15126.6[f][2][A]).

An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (Id. § 15126.6[f][3]).

For each development alternative, this analysis:

- Describes the alternative;
- Analyzes the impact of the alternative as compared to the Proposed Project;
- Identifies the impacts of the Proposed Project that would be avoided or lessened by the alternative; and
- Assesses whether the alternative would meet most of the basic Project objectives.

Per CEQA Guidelines section 15126.6(d), additional significant impacts of the alternatives are discussed in less detail than the significant effects of the Proposed Project.

4.3 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This Section describes the basis for determining the reasonable range of CEQA alternatives and identifies the alternatives that were developed and analyzed in this EIR. The leading factors considered when identifying feasible alternatives to the Proposed Project are the Project Objectives and the impacts that have been identified for the Proposed Project, which are described below.

4.3.1 Proposed Project's Objectives

As described in **Section 2.2.2** (see **Chapter 2.0**, **Project Description**), the 2019 Districtwide Educational Specifications were developed through a comprehensive, year-long process that engaged District leadership, educational leadership, teachers, staff, user groups, maintenance and operations, and students to arrive at an informed and well-represented set of requirements for the design of future learning environments at the SMMUSD. While it was found that due to spatial constraints it was not possible to implement all of the Educational Specifications without demolishing the entire school campus, the Educational Specifications outline the facility requirements needed to support the District's educational programs and are based on the curriculum goals and core values of the District. Thus, the Proposed Project has one basic overarching objective that must be satisfied to the extent feasible for any school facility project:

- Improve the District's educational facilities to achieve as many of the District's 2019 Districtwide Educational Specifications adopted by the District Board as feasible and align with the intent of the Educational Specifications to support 21st century learning at the Roosevelt ES campus. The Educational Specifications include the following subpart considerations:

  - Provide properly sized classroom and facility building sizes to accommodate students and staff and a variety of 21st century learning activities.

  - Improve learning at the school by replacing undersized and inflexible facilities with larger, flexible spaces that accommodate modern, diverse learning styles and allow for variable uses, such as rotational learning in the classroom and project-based learning that allows simultaneous individualized, small group, and large group instruction.

  - Provide enhanced, modern, and technology support spaces, such as libraries, cafeteria, labs, maker spaces, and other student services, that promote “whole child” development.

  - Provide outdoor instructional areas to provide opportunities for art, creativity, exploration, and physical dexterity.

Other supporting Project objectives for the Proposed Project are the following:

- Preserve the philosophy and key elements of the historic district and the Santa Monica Plan while achieving the Educational Specifications.

- Organize the campus to provide safe student circulation.

- Provide safe and secure schools.

- Maintain the campus’s existing student capacity.

- Provide sufficient on-campus parking and efficient student drop-off and pickup facilities.

4.3.2 Summary of Significant Impacts of the Proposed Project

Pursuant to CEQA Guidelines section 15124.6(b), alternatives to the Proposed Project include those that are capable of avoiding or substantially lessening any significant effects of the Proposed Project, even if these alternatives would impede to some degree the attainment of the Proposed Project’s objectives or would be more costly. The Proposed Project, which involves implementation of a Campus Plan on the approximately 6.5-acre Roosevelt Elementary School campus, would be constructed in five phases. Implementation of the Campus Plan involves the demolition and removal of some existing structures, renovation of structures to remain, and construction of five new buildings and outdoor facilities, including parking, athletic facilities, outdoor learning spaces, courtyard, and entryway areas. The following impacts have been identified for the Proposed Project, as discussed in **Chapter 3**, **Environmental Analysis**, of this EIR.

Significant and Unavoidable Impacts

The analysis of the Proposed Project in this EIR has identified one significant and unavoidable impact pertaining to the demolition of four buildings that are contributors to the historic district. Even with mitigation measures, the Proposed Project would have the following significant and unavoidable environmental impact related to Historical Resources:

- Historical Resources
  - The Proposed Project would cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5.

Significant Impacts That Can Be Mitigated To Less Than Significant

As analyzed in this EIR, the Proposed Project would result in the following significant impacts, which, with implementation of identified mitigation measures, would be reduced to less than significant levels:

- Cultural Resources
  - The Proposed Project would cause a substantial adverse change in the significance of an archaeological resource as defined in section 15064.5.
- Geology and Soils
  - The Proposed Project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Hazards and Hazardous Materials
  - The Proposed Project would 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.
  - The Proposed Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- Noise and Vibration
  - The Proposed Project would generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- Transportation
  - The Proposed Project would substantially increase safety hazards due to the presence and use of construction equipment during the construction phase.

4.4 ANALYTIC METHOD

To identify reasonable alternatives to the Proposed Project, the District considered which alternative actions could feasibly accomplish most of the Proposed Projects' basic objectives, and those alternatives that could reduce one or more of the significant impacts of the Proposed Project. The general process for identifying alternatives for consideration in this document included these steps:

1) Review the significant effects resulting from the Proposed Project and identify possible alternatives to avoid or lessen such impacts.

2) Review ideas and alternative concepts suggested during the Proposed Project scoping process and any presented to the lead agency during the preparation of the Draft EIR.

3) Categorize and evaluate strategies and concepts for the ability to meet the basic Proposed Project's objectives and avoid or lessen significant impacts.

4) Develop preliminary alternatives based on the strategies and concepts retained from preliminary screening, and evaluate their feasibility with respect to technical, institutional, cost, and regulatory considerations.

5) Select and refine a final reasonable range of alternatives for CEQA analysis.

4.5 ANALYSIS OF PROPOSED PROJECT ALTERNATIVES

From the process described above, three potentially feasible alternatives, in addition to the required No Project Alternative, were selected for further evaluation and comparison to the Proposed Project. Alternatives considered included attempts to preserving more of the historic district, as well preserving other existing structures, as recommended by public commenters.

The alternatives that were considered but rejected (for the reasons set forth below) include the following:

- Demolition of the entire existing school campus and construction of all new campus buildings and facilities

- Expansion of the school campus boundaries by acquiring adjacent properties and construction of new structures

- Identification and buildout of satellite locations to the existing campus

The potentially feasible alternatives selected for further evaluation in this Chapter include:

- Partial Campus Rehabilitation (Alternative 1)

- Complete Preservation Plus New Development (Alternative 2)

- Majority Preservation (Alternative 3)

- No Project/No Build (Alternative 4)

The analysis of potential impacts assumes that each alternative would comply with applicable Proposed Project requirements and implement all feasible mitigation measures identified for the Proposed Project.

4.5.1 Alternatives Considered but Eliminated from Further Consideration in the EIR

State CEQA Guidelines section 15126.6(c) requires that an EIR identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts.

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR.

4.5.1.1 Demolition of the entire existing school campus and construction of all new campus buildings and facilities

Under this scenario, the District would demolish the entire existing school campus and construct all new campus buildings and facilities. While construction of an entirely new campus would more easily facilitate meeting the Educational Specifications and the Project objectives than the Proposed Project, demolishing the entire campus, including the historic district, would result in a greater magnitude of impacts than the Proposed Project. For this reason, this alternative was not considered further.

4.5.1.2 Expansion of the school campus boundaries by acquiring adjacent properties and construction of new structures

The District considered the possibility of expanding the school campus boundaries, which would allow the construction of new facilities in the expanded areas in accordance with the Educational Specifications while preserving the historic district. As a result, this scenario would avoid impacts to historical resources. However, as shown on **Figure 2-1B**, **Local Vicinity Map**, the school campus is located in an area that is fully built out, which constrains available land. In this way, acquisition of adjacent properties to expand the school campus boundaries would neither be physically nor economically feasible. For these reasons, this alternative was not considered further.

4.5.1.3 Identification and buildout of satellite locations to the existing campus

As mentioned previously, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126.6[f][2][A]). In this alternative, the District would identify other satellite locations in the vicinity of the existing campus, and the satellite locations would be built to include new school facilities in accordance with the Educational Specifications. By expanding the area of the school campus, the historic district would be left to remain. As a result, this scenario would avoid impacts to historical resources. However, as mentioned in the above scenario to expand the school campus, the school campus is located in an area that is fully built out, which constrains available land. In this way, acquisition of nearby properties as satellite locations to Roosevelt Elementary School would neither be physically nor economically feasible. In addition, geographically separating an elementary school presents logistical problems and would reduce the District's ability to meet the educational needs of the school's students. For these reasons, this alternative was not considered further.

4.5.2 Evaluation of Alternatives

Four alternatives to the Proposed Project were identified for further analysis as representing a reasonable range of potentially feasible alternatives. These alternatives were developed based on the criteria identified in **Section 4.3** and are described below.

4.5.2.1 Alternative 1: Partial Campus Rehabilitation

This alternative was requested by the Santa Monica Conservancy in 2022. The chief purpose of this alternative scenario is to allow the existing cafeteria and auditorium structures to remain and become renovated. Under this alternative, the improvements would consist of implementing Phase 1, Phase 2, and portions of Phase 3 and 4 of the Proposed Project. This includes demolition of the Buildings B, C, and K, comprising the historic district, similar to the Proposed Project. Also similar to the Proposed Project, Alternative 1 would demolish Building J and construct the new transitional-kindergarten and kindergarten area, library, Building A (along Lincoln Boulevard), and parking and sports field facilities. In contrast to the Proposed Project, Alternative 1 would locate the teaming space where the Proposed Project would place the maker space, and would also renovate the existing cafeteria (Building D) into a makerspace. While the auditorium (Building H) would be renovated, it would remain insufficient to meet the current enrollment. Refer to **Figure 4-1**, **Alternative 1, Partial Campus Rehabilitation**.

Like the Proposed Project, this alternative would demolish the majority of the historic district. Also, the renovation process for Buildings D and H would require structural upgrades to meet the current building code requirements for seismic design and safety, which would result in significantly higher design and construction costs compared with constructing a new building.

Environmental Impacts

Aesthetics

Alternative 1, Partial Campus Rehabilitation, involves a similar layout and buildout as the Proposed Project and would have similar impacts as the Proposed Project related to scenic quality and community character. This alternative would also have similar impacts related to light and glare. Overall, Alternative 1 would result in aesthetic impacts similar to the Proposed Project's less-than-significant impacts.

Air Quality

Alternative 1 proposes demolition, construction, and renovation activities, which would release criteria pollutants during construction. However, since Alternative 1 would renovate the existing cafeteria and auditorium buildings instead of demolishing and constructing new buildings such as in the Proposed Project, Alternative 1 would result in slightly lower total generation of emissions during the construction phases compared to the Proposed Project, although daily construction emissions would be similar to the Proposed Project. During operations, this alternative would have the same enrollment capacity and staffing as the Proposed Project, and air quality from vehicles trips would remain less than significant, as with the Proposed Project. Air quality impacts during operation of this alternative would remain the same compared to the Proposed Project. Alternative 1 would result in less impacts to air quality compared to the Proposed Project's less-than-significant impacts during construction, and similar air quality impacts as the Proposed Project during operations.

Cultural Resources

Alternative 1 proposes the demolition of Buildings B, C, and K, comprising the historic district, similar to the Proposed Project; therefore, like the Proposed Project, Alternative 1 would result in significant unavoidable impacts to historical resources. Construction of Alternative 1 would result in ground disturbance in the areas where the new buildings are proposed. The earth disturbance has the potential to uncover previously undiscovered archaeological resources, which would require mitigation measure **MM CUL-4**, as identified in Chapter 3 to reduce impacts to less-than-significant levels, similar to the Proposed Project. However, as Alternative 1 would disturb a smaller portion of the ground, the potential for cultural resources impacts would be less in comparison to the Proposed Project.

In summary, similar to the Proposed Project, Alternative 1 would result in significant unavoidable impacts to historical resources. With mitigation, Alternative 1 would further reduce the less-than-significant impact to archaeological resources associated with the Proposed Project.

Energy

Alternative 1 involves the removal of portables and construction of new buildings, similar to the Proposed Project. This alternative would result in construction-related energy consumption; however, because the scale of construction activities would be slightly lower in comparison with the Proposed Project, due to the renovation of the cafeteria and auditorium buildings, Alternative 1 would result in correspondingly less energy consumption.

Following construction, Alternative 1 would operate using the existing and new buildings, similar to the Proposed Project. However, as Alternative 1 would retain more of the existing buildings—which, while renovated, would not operate as efficiently as the new buildings subjected to the current efficiency standards in Title 24 and CALGreen requirements—Alternative 1 would consume energy less efficiently than the Proposed Project. Therefore, while potential operational-related impacts to energy under Alternative 1 would be less than significant, Alternative 1 would not operate or consume resources as efficiently as the Proposed Project.

Geology and Soils

Construction of Alternative 1 involves ground disturbance in the areas where the new buildings are proposed. The earth disturbance has the potential to uncover unknown paleontological resources, which would require mitigation measure **MM GEO-1**, as identified in Section 3.5 of this EIR to reduce impacts to less-than-significant levels, similar to the Proposed Project. However, as Alternative 1 would require a slightly smaller area of ground disturbance due to the renovation (instead of demolition) and new construction of the cafeteria and auditorium buildings, the potential for impacts to paleontological resources would be less in comparison to the Proposed Project.

Greenhouse Gases (GHG)

Alternative 1 would result in construction-related GHG emissions during the demolition, renovation, and new construction activities; however, as the extent of construction work is slightly less than the Proposed Project, the impact of the associated construction GHG emissions would be also less than the Proposed Project's less-than-significant impact. Following construction, the new and renovated buildings under Alternative 1 would operate with more efficiency than the existing buildings and impacts would be less than significant; however, as Alternative 1 would operate with the renovated cafeteria and auditorium structures instead of new buildings as in the case of the Proposed Project, Alternative 1 would generate slightly more GHG emissions than the Proposed Project.

Hazards and Hazardous Materials

Alternative 1 involves demolition and new construction, renovation of existing buildings, and ground disturbance in the areas for the new buildings. Demolition and renovation work on aged structures having the potential to contain hazardous building materials would have the potential to release the hazardous materials if disturbed during demolition and renovation activities. Therefore, Alternative 1 would result in similar less-than-significant impacts as the Proposed Project, with implementation of mitigation measures **MM HAZ-1** and **HAZ-2**. As discussed in **Section 3.7** of this EIR, ground disturbance activities have the potential to disturb existing volatile organic compounds (VOC) resulting from former automotive and dry-cleaning businesses previously located within 1/8 mile from the school campus. Since Alternative 1 would result in ground disturbance, albeit to a slightly lesser degree than the Proposed Project due to the rehabilitation of the cafeteria and auditorium structures which would be demolished in the Proposed Project scenario, Alternative 1 would still require implementation of **MM HAZ-3** to address potential VOCs in the soil. Like the Proposed Project, Alternative 1's impacts in this regard would be less than significant after mitigation but would be slightly reduced from the Proposed Project due to the reduced amount of ground disturbance.

Similar to the Proposed Project, operation of Alternative 1 may involve limited use of common household hazardous materials and/or storage of such materials such as cleaning supplies and those associated with routine maintenance activities or equipment use, which would be managed in compliance with federal, state, and local requirements. Hence, operational-related impacts regarding hazardous materials under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

Noise

Development under Alternative 1 would still require construction and associated site improvements. As with the Proposed Project, it is anticipated that construction noise and vibration impacts would be less than significant with the implementation of mitigation measure **MM N-1**, which requires implementation of a Construction Noise Control Plan. Like the Proposed Project, operational impacts would be less-than-significant. Overall, Alternative 1 would result in noise impacts during construction and operation similar to the Proposed Project.

Transportation and Traffic

Alternative 1 involves demolition, construction, and renovation activities, similar to the Proposed Project. Since two buildings would be renovated under Alternative 1 instead of being demolished followed by new construction as with the Proposed Project, Alternative 1 would result in slightly less construction activity compared with the Proposed Project. However, as the Alternative 1 construction activities still require hauling of heavy construction equipment, operation of large trucks on the surrounding roadway network, supply deliveries, temporary lane closures to the public right-of-way (ROW) adjacent to the campus, and increased safety hazards as a result of construction vehicle activities, Alternative 1 would still require implementation of mitigation measure **MM TR-1** to reduce impacts to less-than-significant levels. However, as Alternative 1 would have slightly fewer construction activities than the Proposed Project, with implementation of **MM TR-1**, the residual construction transportation impacts would be correspondingly less in comparison to the Proposed Project.

During operations, Alternative 1 would result in no change to vehicle miles traveled (VMT), similar to the Proposed Project, as the number of staff and students would not change. Generally, Alternative 1 would result in less than or similar impacts to transportation and traffic compared with the Proposed Project.

Tribal Cultural Resources

As mentioned previously, there has been no indication of sensitive tribal cultural resources on the school campus. Therefore, similar to the Proposed Project, construction of Alternative 1 would result in similar, less-than-significant impacts.

Conclusions

Ability to Reduce Impacts

Alternative 1, Partial Campus Rehabilitation, would not retain the historic district, and would result in significant unavoidable impacts to historical resources. Alternative 1 would require the same mitigation measures as the Proposed Project pertaining to cultural/archaeological resources, geology, hazards, noise, and transportation, as identified in **Chapter 3**. Due to the slightly reduced extent of construction activities, Alternative 1 would result in slightly fewer residual impacts following implementation of the mitigation measures compared with the Proposed Project. However, with regard to impacts in energy and greenhouse gases, although Alternative 1 would result in less-than-significant impacts, these impacts would nevertheless be more impactful than the Proposed Project due to the continued use of the existing buildings, plus the new buildings during operations, as the older existing buildings have less efficient mechanical, electrical, and plumbing systems. Refer to **Table 4-1**, **Summary of the Impacts of the Alternatives**, for a summary of the Alternative 1 environmental impacts.

Ability to Achieve Project Objectives

A summary of the Alternative 1 classroom and facility sizes with respect to the Educational Specifications is provided in **Table 4-2**, **Summary of Alternatives' Ability to Meet Basic Objective Classroom and Facility Building Sizes.** As shown, while similar to the Proposed Project, Alternative 1 would meet fewer of the Educational Specifications' facility sizes than the Proposed Project. Alternative 1 would provide new TK/K and classrooms, a new makerspace and flex building, centralized campus, outdoor educational areas, and expanded new cafeteria. However, Alternative 1 would not meet a key aspect of the Educational Specifications, as the auditorium/multipurpose room, which functions as a campus-wide assembly space for important school-wide programming, would remain undersized and unable to accommodate the existing school capacity (SMMUSD 2019: 28); therefore, Alternative 1 would not provide the extent of larger, flexible spaces that allow variable uses compared with the Proposed Project, as provided under the basic objective, Subpart 2. While Alternative 1 provides some enhanced, modern, and technology support spaces, the Alternative 1 library and cafeteria would not meet the Educational Specifications; however, of note is that similar to the Proposed Project, the provided cafeteria area would still be the largest out of the remaining alternatives. Additionally, similar to the

Proposed Project, outdoor instruction areas would be included, meeting Subpart 4 under the Educational Specifications.

Alternative 1 would generally meet the Supporting Project Objectives, but to a lesser degree than the Proposed Project with respect to preserving the key elements of the historic district while achieving the Educational Specifications.

In summary, Alternative 1 would meet a portion of the basic, overarching objective, though to a lesser degree than the Proposed Project, and several of the secondary objectives, as summarized in **Table 4-3**, **Summary of the Alternatives' Ability to Meet Project Objectives.** It is also important to note that the renovations to the existing cafeteria and auditorium structures would require significantly higher design and construction costs to retrofit seismic design and safety requirements compared with demolition and new construction.

4.5.2.2 Alternative 2: Complete Preservation Plus New Development

This alternative involves preserving and restoring existing permanent buildings on the campus, removal of the portable buildings, and constructing additional buildings to meet a portion of the District's 2019 Districtwide Educational Specifications. The new buildings include a makerspace and flex building, library, and new TK/K classroom building, which would be located along the perimeter of the campus where space is available. Renovations would be performed on Building A, Building H, and Building J/Administration. The configuration of this alternative is shown on **Figure 4-2, Complete Preservation Plus New Development**.

This alternative would preserve the entire historic district; however, as shown on **Figure 4-2**, with the placement of the additional new buildings where space is available on the campus, the new buildings would further obstruct and block the historic district buildings from public view. The campus would still have 10 undersized classrooms that would not meet the District's 2019 Districtwide Educational Specifications (SMMUSD 2019: 28). The administration building would also remain undersized and not meet the Educational Specifications. Additionally, the campus would lack outdoor classroom areas, the cafeteria would not be improved with an upgraded kitchen to allow for cooking, and the outdoor dining areas would remain disjointed and not be located near the indoor dining areas. Further, renovation of the buildings would require removal of existing shear walls that may result in damage to the remaining buildings. Costs to repair the existing buildings and construction of new buildings would be anticipated to be higher than to rebuild. Lastly, as the existing campus is already fully built out, as shown on **Figure 2-3**, **Existing Campus Facilities**, the addition of more buildings would increase the density of buildout and create a further cramped and decentralized campus. This scenario would create narrow and winding walk paths between buildings that interfere with a freely flowing pedestrian circulation pattern. The campus would have additional entry points, which would require more effort to monitor and manage individuals entering and exiting from the campus.

Environmental Impacts

Aesthetics

Under this alternative, the addition of new buildings generally along all sides of the campus and preservation of the existing buildings would increase the density of structures on the campus, thereby increasing the visual mass and bulk of the campus. The new buildings along Montana Avenue would also further obstruct views of the historic district. This alternative may result in additional lighting and glare from the new buildings; however, with adequate choice of construction materials, the impact would be considered less than significant. Since this alternative would continue the existing educational use of the campus, impacts to visual character would be less than significant. Impacts under this alternative would be greater than the Proposed Project, but still less than significant.

Air Quality

This alternative would keep the existing permanent buildings and construct additional buildings. Therefore, Alternative 2 would result in construction emissions due to the additional buildings. However, since fewer buildings and overall ground disturbance would be involved, the overall construction emissions under Alternative 2 would be less in comparison to the less-than-significant impacts of the Proposed Project, although daily construction emissions would be similar to the Proposed Project. During operations, since the school enrollment and staff capacity at the school would not change, the operational-related air quality impacts under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

Cultural Resources

Alternative 2 would preserve the entire historic district on the campus, and hence would avoid significant impacts to the historic district, whereas the Proposed Project would result in an unavoidable significant impact due to the removal of approximately 67 percent of the buildings contributing to the historic district.

Construction of Alternative 2 would result in ground disturbance in the areas where the new buildings are proposed along the perimeter of the school. The earth disturbance has the potential to uncover previously undiscovered archaeological resources, which would require mitigation measure **MM CUL-4**, as identified in Chapter 3 to reduce impacts to less-than-significant levels, similar to the Proposed Project. However, as Alternative 2 would disturb a smaller portion of the ground, the potential for impacts to cultural resources would be less than with the Proposed Project.

In summary, Alternative 2 would avoid a significant unavoidable impact to historical resources, in contrast to the Proposed Project. Additionally, with mitigation, Alternative 2 would further reduce the less-than-significant impact to archaeological resources associated with the Proposed Project.

Energy

Alternative 2 involves demolition of portables and construction of new buildings while retaining the existing permanent buildings on the campus. This alternative would result in construction-related energy consumption; however, due to the smaller scale of construction activities compared with the Proposed Project, Alternative 2 would result in comparatively less energy consumption.

Following construction, Alternative 2 would operate using the existing and new buildings, similar to the Proposed Project. However, as Alternative 2 would retain a higher portion than the Proposed Project of the existing old buildings that were not subjected to the current efficiency standards in Title 24 and CALGreen requirements, Alternative 2 would consume energy less efficiently than the Proposed Project. Therefore, while potential operational-related impacts to energy under Alternative 2 would be less than significant, Alternative 2 would not operate or consume resources as efficiently as the Proposed Project.

Geology and Soils

As mentioned previously, construction of Alternative 2 would entail ground disturbance in the areas where the new buildings are proposed along the perimeter of the school. The earth disturbance has the potential to uncover unknown paleontological resources, which would require implementation of mitigation measure **MM GEO-1**, as identified in **Section 3.5** to reduce impacts to less-than-significant levels, similar to the Proposed Project. However, as Alternative 2 would disturb a smaller portion of the ground, the potential for impacts to paleontological resources would be less in comparison to the Proposed Project.

Greenhouse Gases

Alternative 2 would result in construction-related GHG emissions during the demolition, renovation, and new construction activities; however, as the extent of construction work is less than the Proposed Project, the associated construction GHG emissions would be also less than the Proposed Project's less-than-significant impact. Following construction, the new and renovated buildings under Alternative 2 would operate with more efficiency than the existing buildings and impacts would be less than significant; however, as Alternative 2 would not include the extent of new and renovated buildings as the Proposed Project, Alternative 2 would generate more GHG emissions during operations than the Proposed Project.

Hazards and Hazardous Materials

Alternative 2 involves the removal of the portable structures of unknown age, renovation of existing buildings, and ground disturbance in the areas for the new buildings. Alternative 2 would result in a lesser degree of construction activity compared with the Proposed Project, but would still involve demolition activities, renovation, and soil disturbance activities that have the potential to release hazardous building materials and soil contaminants. As a result, Alternative 2 would still require implementation of **MM HAZ 1** through **MM HAZ 3** to reduce the potential for release of on-site hazardous materials to less than significant levels. However, as Alternative 2 would disturb a smaller portion of the site, impacts regarding hazardous materials would be less in comparison to the Proposed Project.

Similar to the Proposed Project, operation of Alternative 2 may involve limited use of common household hazardous materials and/or storage of such materials such as cleaning supplies and those associated with routine maintenance activities or equipment use, which would be managed in compliance with federal, state, and local requirements. Hence, operational-related impacts regarding hazardous materials under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

Noise

The elementary school is surrounded by residential uses on three sides of the campus, with the closest sensitive receptor located approximately 50 feet to the northwest along Alta Avenue. Alternative 2 would generate construction noise and vibration during the demolition, renovation, and construction activities, which would be generally located along the perimeter of the school. Overall construction of Alternative 2 would generate noise at a lesser degree than the Proposed Project as a result of the reduced extent of construction work. Regardless, due to the close proximity of the sensitive receptors, Alternative 2 would require implementation of a Construction Noise Control Plan, as identified in mitigation measure **MM NOI-1**, to reduce impacts to less than significant levels. Thus, construction noise and vibration impacts from Alternative 2 would be less than significant with mitigation, and would be less than those of the Proposed Project. During operations, Alternative 2 would continue uses as a school under the same enrollment capacity, and similar to the Proposed Project, would result in less-than-significant impacts to noise.

Transportation and Traffic

Alternative 2 involves construction of a makerspace and flex building, library, and new TK/K classroom building, demolition of existing portables, and renovation of three buildings. While the extent of construction under Alternative 2 is less than the Proposed Project, construction of Alternative 2 would still require hauling of heavy construction equipment, operation of large trucks on the surrounding roadway network, supply deliveries, temporary lane closures on the public ROW adjacent to the campus, and increased safety hazards as a result of construction vehicles entering or existing the campus. Therefore, Alternative 2 would still require implementation of mitigation measure **MM TR-1** to reduce impacts to less than significant levels. However, as Alternative 2 would have fewer construction activities than the Proposed Project, the construction transportation impacts would be correspondingly fewer in comparison to the Proposed Project.

During operations, Alternative 2 would result in no change to VMT, similar to the Proposed Project, as the number of staff and students would not change. Generally, Alternative 2 would result in less than or similar impacts to transportation and traffic compared with the Proposed Project.

Tribal Cultural Resources

As mentioned previously, there has been no indication of sensitive tribal cultural resources on the school campus. Therefore, similar to the Proposed Project, construction of Alternative 2 would result in similar, less-than-significant impacts.

Conclusions

Ability to Reduce Impacts

Alternative 2, Complete Preservation Plus New Development Alternative, would retain the entire historic district, add new structures to the campus, and renovate existing buildings. As a result, Alternative 2 would result in less-than-significant impacts to the historic district, thereby avoiding the Project's significant, unavoidable impacts to historical resources. Alternative 2 would still require mitigation measures pertaining to cultural resources, geology, hazards, noise, and transportation, as identified for the Proposed Project in Chapter 3; however, due to the lesser extent of construction activities, Alternative 2 would result in fewer residual impacts following implementation of the mitigation measures compared with the Proposed Project. Conversely, with regard to impacts in aesthetics, energy, and greenhouse gases, Alternative 2 would result in less-than-significant impacts that are more impactful than the Proposed Project due to the continued use of the existing buildings plus the new buildings during operations, with the older existing buildings having less efficient mechanical, electrical, and plumbing systems. Refer to **Table 4-1** for a summary of the Alternative 2 impacts.

Ability to Achieve Project Objectives

Alternative 2, Complete Preservation Plus New Development, would not meet the majority of the Educational Specifications' classroom and facility sizes, as shown on **Table 4-2**. Alternative 2 would provide new TK/K classrooms, a new makerspace and flex building, and a new library. However, Alternative 2 would not meet the key objective to have properly sized facilities for the majority of the student classrooms (second through sixth grades and special education), teaming areas, multipurpose/auditorium space, cafeteria, flex music, administration facilities, and outdoor classroom areas (SMMUSD 2019: 28). In this manner, Alternative 2 would not provide flexible spaces, enhanced technology support spaces, and outdoor instructional areas to meet the basic objective subparts. Further, the increased density of structures on the campus would reduce available open space, hinder intracampus circulation, and exacerbate safety and access concerns (SMMUSD 2019: 27).

Alternative 2 would neither meet the basic, overarching objective, nor the majority of the secondary objectives, as summarized in **Table 4-3**. Therefore, after detailed analysis, this alternative is found to be infeasible.

4.5.2.3 Alternative 3: Majority Preservation Alternative

Alternative 3, Majority Preservation Alternative, is based on the principle from the National Park Service that if a historic district retains a majority of its contributing features and integrity, and continues to convey its significance, future projects will not result in a "substantial adverse change." Under this alternative, Building C and a portion of Building K (the recent addition constructed in 1951) of the historic district would be removed, while the remaining buildings comprising the historic district (Buildings B, C, E, G, and J) would remain, thereby preserving the majority of the historic district. With these changes to be conducted in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the historic district would retain historic value.

This alternative also includes constructing the two-story classroom building along 9th Street (similar to the Proposed Project) that would meet the Educational Specifications for larger classrooms. Additionally, the portables located along Lincoln Boulevard would be removed and new TK/K classroom buildings and yard would be constructed at the northwest corner of the school campus. Further, the auditorium would be renovated. Due to spatial constraints, this alternative would not include teaming areas or improvements to reconstruct or expanding the existing undersized library and administrative buildings to meet the District's Educational Specifications, and it would not be possible to expand the cafeteria with a cooking kitchen. Furthermore, the spatial constraints would not allow outdoor classrooms, and the outdoor dining area would remain separated from the indoor dining area.

Lastly, similar to but slightly less in extent than Alternative 2, the Alternative 3 configuration would increase the density of buildings on the campus, as shown in **Figure 4-3**, **Alternative 3, Majority Preservation**, which would hinder the pedestrian circulation by creating a generally cramped and further decentralized campus. The campus would continue to have multiple entry points on each side, which would be more difficult to monitor for security of the campus.

Environmental Impacts

Aesthetics

Alternative 3 would add new buildings generally along each side of the campus, similar to Alternative 2, and would retain the majority of the existing structures in the historic district. As a result, Alternative 3 would increase the building density, which would increase the visual mass and bulk of the campus. The new buildings along Montana Avenue would also further obstruct views of the historic district. This alternative may result in additional light and glare from the new buildings; however, with choice of construction materials and proper lighting design, the massing and lighting impacts would be considered less than significant. Since this alternative would continue the existing educational use of the campus, impacts to visual character would be less than significant. Impacts under Alternative 3 would be greater than the Proposed Project, but still less than significant.

Air Quality

Alternative 3 includes retaining and renovating five buildings of the historic district, constructing five new buildings, renovating the auditorium, and removing portable classrooms. Implementation of Alternative 3 would result in construction emissions due to the construction, demolition, and renovation activities as associated ground disturbance. Since Alternative 3 involves less new construction and a slightly smaller disturbance footprint compared to the Proposed Project, overall construction emissions under Alternative 3 would be less compared with the less-than-significant impacts of the Proposed Project, although daily construction emissions would be similar to the Proposed Project. During operations, since the school enrollment and staff capacity at the school would not change, operational-related air quality impacts under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

Cultural Resources

Alternative 3 would preserve the majority of the historic district on the campus, and with mitigation to ensure that the demolition and restoration work would be conducted in accordance with the Secretary of the Interior's standards for preservation and rehabilitation, would result in less-than-significant impacts to historical resources, thereby avoiding the significant and unavoidable impact to the historic district identified for the Proposed Project.

Construction of Alternative 3 would result in ground disturbance in the areas where the new buildings are proposed along the perimeter of the school. The earth disturbance has the potential to uncover previously undiscovered archaeological resources, which would require mitigation measure **MM CUL-4**, as identified in **Chapter 3**, to reduce impacts to less-than-significant levels, similar to the Proposed Project. However, as Alternative 3 would disturb a smaller portion of the ground, the potential for cultural resources impacts would be less in comparison to the Proposed Project.

In summary, with mitigation, Alternative 3 would result in less-than-significant impacts to historical resources and would avoid a significant unavoidable impact to historical resources, in contrast to the Proposed Project. Additionally, with mitigation, Alternative 3 would further reduce the less-than-significant impact to archaeological resources associated with the Proposed Project.

Energy

Alternative 3 involves demolition of portables and construction of new buildings while retaining the majority of the permanent buildings on the campus. This alternative would result in construction-related energy consumption; however, due to the slightly smaller scale of construction activities compared with the Proposed Project, Alternative 3 would result in comparatively less energy consumption.

Following construction, Alternative 3 would operate using the existing and new buildings, similar to the Proposed Project. However, as Alternative 3 would retain a higher portion than the Proposed Project of the existing old buildings that were not subjected to the current efficiency standards in Title 24 and CALGreen requirements, Alternative 3 would consume energy less efficiently than the Proposed Project. Therefore, while potential operational-related impacts to energy under Alternative 3 would be less than significant, Alternative 3 would not operate or consume resources as efficiently as the Proposed Project.

Geology and Soils

Construction of Alternative 3 would entail ground disturbance in the areas where the new buildings are proposed along the perimeter of the school. The earth disturbance has the potential to uncover unknown paleontological resources, which would require mitigation measure **MM GEO-1**, as identified in **Section 3.5**, to reduce impacts to less-than-significant levels, similar to the Proposed Project. However, as Alternative 3 would require a smaller area of ground disturbance, the potential for impacts to paleontological resources would be less in comparison to the Proposed Project.

Greenhouse Gases

Alternative 3 would result in construction-related GHG emissions during the demolition, renovation, and new construction activities; however, as the extent of construction work is less than the Proposed Project, the associated construction GHG emissions would be also less than the Proposed Project's less-than-significant impact. Following construction, the new and renovated buildings under Alternative 3 would operate with more efficiency than the existing buildings and impacts would be less than significant; however, as Alternative 3 would not include the same extent of new and renovated buildings as the Proposed Project, Alternative 3 would generate slightly more GHG emissions than the Proposed Project.

Hazards and Hazardous Materials

Alternative 3 involves the removal of the portable structures of unknown age, renovation of existing buildings, and ground disturbance in the areas for the new buildings. Alternative 3 would result in a lesser degree of construction activities compared with the Proposed Project, but would still involve demolition activities, renovation, and soil disturbance activities that have the potential to release hazardous building materials and soil contaminants. As a result, Alternative 3 would still require implementation of mitigation measures **MM HAZ 1** through **MM HAZ 3** to reduce potential release of on-site hazardous materials (due to prior use of building materials potentially containing hazardous materials and previous automotive and dry-cleaning operations in the near vicinity of the school) to less than significant levels. However, as Alternative 3 would disturb a smaller portion of the site, impacts regarding hazardous materials would be less in comparison to the Proposed Project.

Similar to the Proposed Project, operation of Alternative 3 may involve limited use of common household hazardous materials and/or storage of such materials such as cleaning supplies and those associated with routine maintenance activities or equipment use, which would be managed in compliance with federal, state, and local requirements. Hence, operational-related impacts regarding hazardous materials under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

Noise

As mentioned previously, the closest sensitive receptor to the campus is located approximately 50 feet to the northwest along Alta Avenue. Alternative 3 would generate construction noise and vibration during the demolition, renovation, and construction activities, which would be generally located along the perimeter of the school, although to a lesser degree than the Proposed Project as a result of the reduced extent of construction work. Regardless, due to the close proximity of the sensitive receptors, Alternative 3 would require implementation of a Construction Noise Control Plan, as identified in mitigation measure **MM NOI-1**, to reduce impacts to less than significant levels, similar to the Proposed Project. Thus, construction noise and vibration impacts from Alternative 3 would be less than significant with mitigation, and would be less than those of the Proposed Project. During operations, Alternative 3 would continue uses as a school under the same enrollment capacity, and similar to the Proposed Project, would result in less-than-significant impacts to noise.

Transportation and Traffic

Alternative 3 involves construction of the two-story classroom building, a makerspace and flex building, and new TK/K classroom building, demolition of existing portables, and renovation of six buildings. The extent of construction under Alternative 3 is less than the Proposed Project; however, construction of Alternative 3 would still require hauling of heavy construction equipment, operation of large trucks on the surrounding roadway network, supply deliveries, temporary lane closures to the public ROW adjacent to the campus, and increased safety hazards as a result of construction vehicles entering or existing the campus. As a result, Alternative 3 would still require implementation of mitigation measure **MM TR-1** to reduce impacts to less than significant levels. However, as Alternative 3 would have fewer construction activities than the Proposed Project, construction transportation impacts would be correspondingly less in comparison to the Proposed Project.

During operations, Alternative 3 would result in no change to VMT, similar to the Proposed Project, as the number of staff and students would not change. Generally, Alternative 3 would result in less than or similar impacts to transportation and traffic compared with the Proposed Project.

Tribal Cultural Resources

As mentioned previously, there has been no indication of sensitive tribal cultural resources on the school campus. Therefore, similar to the Proposed Project, construction of Alternative 3 would result in similar, less-than-significant impacts.

Conclusions

Ability to Reduce Impacts

Alternative 3, Majority Preservation Alternative, would retain most of the historic district, with implementation of mitigation measures for rehabilitation standards, addition of new structures to the campus, and renovation of existing buildings. Alternative 3 would result in less-than-significant impacts to the historic district, thereby avoiding the Project's significant, unavoidable impacts to historical resources. Alternative 3 would require additional mitigation measures in cultural resources pertaining to rehabilitation standards and would still require the same mitigation measures as the Proposed Project pertaining to cultural/archaeological resources, geology, hazards, noise, and transportation, as identified in Chapter 3. However, due to the lesser extent of construction activities, Alternative 3 would result in less residual impact following implementation of the mitigation measures compared with the Proposed Project. However, with regard to impacts in aesthetics, energy, and greenhouse gases, Alternative 3 would result in less-than-significant impacts that are more impactful than the Proposed Project due to the continued use of the existing buildings plus the new buildings during operations, as the older existing buildings have less efficient mechanical, electrical, and plumbing systems. Refer to **Table 4-1** for a summary of the Alternative 3 impacts.

Ability to Achieve Project Objectives

Alternative 3, Majority Preservation Alternative, would only partially meet the Educational Specifications' classroom and facilities sizes, as shown on **Table 4-2**. Alternative 3 would provide new TK/K and some properly sized grade classrooms, and a new makerspace and flex building. However, Alternative 3 would still have inadequately sized classrooms for fifth grade and special education students (SMMUSD 2019: 28), would not provide teaming areas, and would have insufficient outdoor classroom areas (SMMUSD 2019: 27). Additionally, despite renovation work, Alternative 3 would have inadequately sized auditorium, library, and administration buildings (SMMUSD 2019: 28). Further, the library would need to be split into two separate wings, as shown on **Figure 4-3**, in order to reuse the existing structures, which would result in a disjointed use. In this manner, Alternative 3 would not provide flexible spaces, enhanced technology support spaces, and outdoor instructional areas to meet the basic objective subparts. Furthermore, the increased density of structures on the campus would reduce available open space, hinder intracampus circulation, and would exacerbate safety and access concerns (SMMUSD 2019: 27).

Alternative 3 would neither meet the basic, overarching objective, nor the majority of the secondary objectives, as summarized in **Table 4-3**. Therefore, after detailed analysis, this alternative is found to be infeasible.

4.5.2.4 Alternative 4: No Project/No Build Alternative

Per section 15124.6(e)(1) of the CEQA Guidelines, this alternative assumes that no development would occur on the Proposed Project site in the foreseeable future. The site would remain unchanged and none of the proposed improvements would occur. If the Proposed Project were not approved, the District would continue to use the site as an elementary school campus. The on-site buildings and facilities would continue to be maintained and used in their current condition, without replacement, expansion, or renovations.

Environmental Impacts

Aesthetics

Under this alternative, no structural or any other visual changes to the existing Roosevelt Elementary School campus facilities would occur. There would be no changes to the physical environment as it relates to aesthetic resources, including light and glare, and no impacts would occur. The No Project/No Build Alternative would avoid the less-than-significant aesthetic impacts of the Proposed Project as well as the less-than-significant light and glare impacts, and impacts under this alternative would be less than those of the Proposed Project.

Air Quality

No construction would occur under this alternative; therefore, no construction-related air quality impacts would occur. Construction-related impacts would be less than the less-than-significant impacts of the Proposed Project. Operation (i.e., student enrollment, staffing, and general operational characteristics) under this alternative would remain similar to existing conditions. As discussed in **Chapter 2**, **Project Description**, the Proposed Project would not change enrollment capacity or staffing at the school; therefore, operational-related air quality impacts under this alternative would be similar to the less-than-significant impacts of the Proposed Project.

Cultural Resources

The No Project/No Build Alternative would not demolish any buildings, including those contributing to the historic district. The No Project/No Build Alternative would result in no impacts to historical resources, which would be less than the Proposed Project's significant and unavoidable impacts. The No Project/No Build Alternative would also avoid ground-disturbing construction activities. Therefore, potential construction-related impacts to subsurface unknown archaeological resources would be avoided and impacts would be less than those of the Proposed Project. The No Project/No Build Alternative would avoid the significant and unavoidable and less-than-significant (after mitigation) cultural resources impacts of the Proposed Project. Impacts under this alternative would be less than those of the Proposed Project.

Energy

Under this alternative, construction of new buildings and facilities would not occur. Therefore, no construction-related energy consumption would occur, and construction-related impacts to energy would be less than those of the Proposed Project. Under this alternative, the campus would continue to operate in its existing condition as an elementary school. Therefore, energy demand for electricity and fuel consumption would remain as is and would not affect local or state renewable energy plans. The Proposed Project would entail the operation of newly constructed buildings designed and built in compliance with current Title 24 and CALGreen requirements for energy conservation, which require more stringent efficiency standards compared with the existing buildings on the campus. Therefore, while potential operational-related impacts to energy under the No Project/No Build Alternative would be less than significant, the No Project/No Build Alternative would not operate or consume resources as efficiently as the Proposed Project.

Geology and Soils

No new construction activities, including grading, would occur under the No Project/No Build Alternative. Therefore, potential construction-related impacts to subsurface unknown paleontological resources would be avoided and impacts would be less than those of the Proposed Project. The No Project/No Build Alternative would avoid the residual less-than-significant impacts (after implementing mitigation for paleontological resources) of the Proposed Project. Impacts under this alternative would be less than those of the Proposed Project.

Greenhouse Gases

Under this alternative, no demolition would occur, and no new construction and modernization would occur. Therefore, no construction-related GHG emissions would occur, and this alternative's GHG emissions would be less than the Proposed Project's less-than-significant impact. The campus would continue to operate as an elementary school, and GHG emissions would remain unchanged from existing conditions. As with the Proposed Project, the No Project/No Build Alternative would not conflict with any applicable plans or policies.

During operations, however, the No Project/No Build Alternative would generate more GHG emissions than the Proposed Project, since under the New Campus Plan older buildings would be replaced or renovated in accordance with current energy efficient building standards.

Hazards and Hazardous Materials

Because no development would occur under the No Project/No Build Alternative, construction impacts related to hazards or hazardous materials would be less than the residual less-than-significant impacts (after implementation of mitigation measures for hazardous building materials) resulting from the Proposed Project. However, no remediation of such hazardous materials would occur under the No Project/No Build Alternative, and these materials, if present, would remain on the school campus. The alternative would continue to use and handle small quantities of hazardous materials typical of a school during operation (such as cleaning supplies, science laboratory chemicals, pesticides and landscaping hazardous materials). Therefore, impacts from hazardous materials during operation would be less than significant, similar to the Proposed Project.

Noise

No construction noise impacts would occur under this alternative; therefore, the construction noise impacts would be less than those of the Proposed Project, which were determined to be less than significant following implementation of mitigation to reduce construction noise. The No Project/No Build alternative would also avoid the Project's construction vibration impacts, which were determined to be less than significant. Under this alternative, the campus would continue to operate as an elementary school, and operational noise would not increase at the residences adjacent to the Proposed Project's Site. The No Project/No Build Alternative and the Proposed Project would have similar less-than-significant operational noise impacts. Overall, the No Project/No Build Alternative would result in fewer noise impacts than the Proposed Project, as construction noise and vibration impacts would be avoided.

Transportation and Traffic

There would be no construction under this alternative, and therefore there would be no impacts as a result of construction-related traffic. As such, the No Project/No Build Alternative would result in less impact compared with the residual less-than-significant impacts of the Proposed Project, following implementation of mitigation to reduce construction traffic impacts. However, the No Project/No Build Alternative would not provide the benefits that would result from the Proposed Project in terms of reconfiguring the on-site parking lot, improving drop-off/pickup areas, and improving pedestrian circulation. The No Project/No Build Alternative would result in no change to VMT, similar to the Proposed Project, as the number of staff and students would not change. Generally, the No Project/No Build Alternative would result in less than or similar impacts to transportation and traffic compared with the Proposed Project.

Tribal Cultural Resources

There has been no indication of sensitivity for tribal cultural resources identified on the school campus through the AB 52 consultation process. Since the No Project/No Build Alternative would not entail construction activities, this alternative would result in no impact to potential tribal cultural resources. Therefore, the No Project/No Build Alternative would avoid the less-than-significant impacts of the Proposed Project. Impacts under this alternative would be less than those of the Proposed Project.

Conclusions

Ability to Reduce Impacts

The No Project/No Build Alternative would result in the continued educational use of the elementary school and with no impacts to the historic district and no construction-related impacts. As a result, the No Project/No Build Alternative would avoid the Project's significant, unavoidable impacts to historical resources and would avoid the construction-related impacts of the Proposed Project, thus not requiring mitigation measures pertaining to cultural resources, geology, hazards, noise, and transportation, as identified for the Proposed Project in **Chapter 3**. However, the benefits of the Proposed Project would also not occur, including providing modernized school structures that would be constructed to current safety code standards and energy efficiency requirements. In summary, selection of the No Project/No Build Alternative would result in no new environmental effects. Maintaining the Project site in its present state would avoid the environmental impacts associated with historical resources, archaeological resources, paleontological resources, hazardous materials, and construction noise. However, operation of the No Project/No Build Alternative would result in less-than-significant impacts that are more impactful than the Proposed Project in regard to energy and GHG emissions due to the continued use of the existing, less energy efficient buildings. Refer to **Table 4-1** for a summary of the Alternative 4 impacts.

Ability to Achieve Project Objectives

As mentioned in **Section 2**, the District adopted the 2019 Districtwide Educational Specifications to develop and provide learning environments for students that support new developments in technology and the expectations of the twenty-first-century workforce. The No Project/No Build Alternative would neither meet the District's basic objective, nor any of the secondary objectives, as summarized in **Table 4-2** and **Table 4-3**. Therefore, after detailed analysis, this alternative is found to be infeasible.

4.5.3 Environmentally Superior Alternative

The Environmentally Superior Alternative for the Proposed Project would be Alternative 4, the No Project/No Build Alternative. Compared to the Proposed Project, the No Project/No Build Alternative would avoid impacts to the historic district, thereby resulting in no impacts to historical resources. The No Project/No Build Alternative would also avoid all potential construction impacts and would not be required to implement the mitigation measures related to cultural resources, geology and soils, hazards, noise, and transportation. However, as discussed, the benefits of the Proposed Project would also not occur, including implementation of the District's Educational Specifications, improvements to the campus pedestrian circulation and safety, and new structures constructed to current seismic code standards and energy efficiency requirements.

In cases where the No Project/No Build Alternative is the environmentally superior alternative, the environmentally superior development alternative must be identified. The environmentally superior development alternative for the Proposed Project would be Alternative 3, the Majority Preservation Alternative. Compared to the Proposed Project, the Majority Preservation Alternative would reduce impacts to historical resources from significant levels to less than significant levels with additional mitigation. Due to the lesser extent of construction activities, Alternative 3 would result in less residual impacts compared with the Proposed Project following implementation of the mitigation measures pertaining to cultural/archaeological resources, geology, hazards, noise, and transportation. However, with regard to impacts in aesthetics, energy, and greenhouse gases, Alternative 3 would result in less-than-significant impacts that are still more impactful than the Proposed Project, due to the continued use of the existing buildings plus the new buildings during operations, as the older existing buildings have less efficient mechanical, electrical, and plumbing systems. However, as discussed under **Section 4.5.2.3**, this alternative would not provide the conditions needed to meet the basic objective and would not meet the majority of the secondary objectives. Therefore, as the Environmentally Superior Alternative, this alternative was found to be infeasible.

Table 4-1, **Summary of the Impacts of the Alternatives**, compares the level of impacts for each alternative and the Proposed Project. In addition, **Table 4-3**, **Summary of the Alternatives' Ability to Meet Project Objectives**, compares the ability of each alternative to meet the objectives of the Proposed Project.

TABLE 4-1: SUMMARY OF THE IMPACTS OF THE ALTERNATIVES

Impact Topic	Proposed Project	Alternative 1: Partial Rehabilitation Alternative	Alternative 2: Complete Preservation Plus New Development	Alternative 3: Majority Preservation Alternative	Alternative 4: No Project/ No Build Alternative
Aesthetics	LTS	LTS	LTS	LTS	NI
Air Quality	LTS	LTS	LTS	LTS	NI
Cultural Resources	S/U	S/U	LTS/M	LTS/M	NI
Energy	LTS	LTS	LTS	LTS	NI
Geology and Soils	LTS/M	LTS/M	LTS/M	LTS/M	NI
Greenhouse Gas Emissions	LTS	LTS	LTS	LTS	NI
Hazards and Hazardous Materials	LTS/M	LTS/M	LTS/M	LTS/M	NI
Noise	LTS/M	LTS/M	LTS/M	LTS/M	NI
Transportation	LTS/M	LTS/M	LTS/M	LTS/M	NI
Tribal Cultural Resources	LTS	LTS	LTS	LTS	NI

Notes: LTS = Less than Significant; LTS/M = Less than Significant with Mitigation; NI = No Impact; S/U = Significant and Unavoidable.

TABLE 4-2: SUMMARY OF ALTERNATIVES' ABILITY TO MEET BASIC OBJECTIVE CLASSROOM AND FACILITY BUILDING SIZES

Campus Area	Educational Specifications	Proposed Project	Alternative 1: Partial Rehabilitation	Alternative 2: Complete Preservation Plus	Alternative 3: Majority Preservation	Alternative 4: No Project/No Build (same as Existing)
TK	1,350 SF/ classroom	1,350 SF/ classroom	1,350 SF/ classroom	1,350 SF/ classroom	1,350 SF/ classroom	***~1,226 SF / classroom***
K	1,350 SF/ classroom	1,350 SF/ classroom	1,350 SF/ classroom	1,350 SF/ classroom	1,350 SF/ classroom	***~1,226 SF / classroom***
1st Grade	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF / classroom	1,200 SF / classroom	***~960 SF / classroom***
2nd Grade	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF/ classroom	***~890 SF / classroom***	1,200 SF / classroom	***~890 SF / classroom***
3rd Grade	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF/ classroom	***~960 SF / classroom***	1,200 SF / classroom	***~960 SF / classroom***
4th Grade	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF/ classroom	***~960 SF / classroom***	1,200 SF / classroom	***~960 SF / classroom***
5th Grade	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF/ classroom	***~960 SF / classroom***	***~960 SF / classroom***	***~960 SF / classroom***
Special Education	1,200 SF/ classroom	1,200 SF/ classroom	1,200 SF/ classroom	***~960 SF / classroom***	***~960 SF / classroom***	***~960 SF / classroom***
Teaming Area	8,800 SF	10,000 SF	10,000 SF	***2,200 SF***	***None provided***	***None provided***
Flex Science/Art	2,800 SF	3,850 SF	3,850 SF	2,800 SF	2,800 SF	***None provided***
Maker Lab	4,000 SF	4,500 SF	4,405 SF	5,000 SF	5,000 SF	***None provided***
Multipurpose/ Auditorium	5,200 SF	5,500 SF	***4,963 SF***	***4,963 SF***	***4,963 SF***	***4,963 SF***
Cafeteria/Culinary	8,000 SF	***6,000 SF***	***6,000 SF***	***4,405 SF***	***4,405 SF***	***4,405 SF***
Flex Music	1,920 SF	2,750 SF	2,750 SF	***1,450 SF***	***1,450 SF***	***None provided***
Library	7,900 SF	***4,900 SF***	***4,900 SF***	7,900 SF	***7,600 SF***	***2,639 SF***
Administration	4,330 SF	4,435 SF	4,435 SF	***3,550 SF***	***3,550 SF***	***3,300 SF***

Source: SMMUSD. 2019. Santa Monica-Malibu Unified School District Districtwide Educational Specifications. April.
Bold italic with shading indicates where an alternative does ***not*** meet the Educational Specifications (second column).

TABLE 4-3: SUMMARY OF THE ALTERNATIVES' ABILITY TO MEET PROJECT OBJECTIVES

Objective	Proposed Project	Alternative 1: Partial Rehabilitation Alternative	Alternative 2: Complete Preservation Plus New Development Alternative	Alternative 3: Majority Preservation Alternative	Alternative 4: No Project/ No Build Alternative
Basic Project Objective					
Basic Overarching Objective: Improve the District's educational facilities to achieve as many of the District's 2019 Districtwide Educational Specifications adopted by the District Board as feasible and align with the intent of the Educational Specifications to support 21st century learning at the Roosevelt ES campus. The Educational Specifications include the following subparts:	Yes	Less than Proposed Project	No	No	No
Provide properly sized classroom and facility building sizes to accommodate students and staff and a variety of 21st century learning activities (Table 4-2).	Yes	Less than Proposed Project	No	No	No
Improve learning at the school by replacing undersized and inflexible facilities with larger, flexible spaces that accommodate modern, diverse learning styles and allow for variable uses, such as rotational learning in the classroom and project-based learning that allows simultaneous individualized, small group, and large group instruction.	Yes	Less than Proposed Project	No	No	No
Provide enhanced, modern, and technology support spaces, such as libraries, cafeteria, labs, maker spaces, and other student services, that promote "whole child" development.	Yes	Yes	No	No	No
Provide outdoor instructional areas to provide opportunities for art, creativity, exploration, and physical dexterity.	Yes	Yes	No	No	No
Supporting Project Objectives					
Preserve the philosophy and key elements of the historic district and the Santa Monica Plan while achieving the Educational Specifications.	Yes	Less than the Proposed Project	No	No	No
Organize the campus to provide safe student circulation.	Yes	Yes	No	No	No
Provide safe and secure schools.	Yes	Yes	No	No	No
Maintain the campus's existing student capacity	Yes	Yes	Yes	Yes	Yes
Provide sufficient on-campus parking and effective student drop-off and pickup facilities.	Yes	Yes	No	No	No

N

NOT TO SCALE

Michael Baker INTERNATIONAL

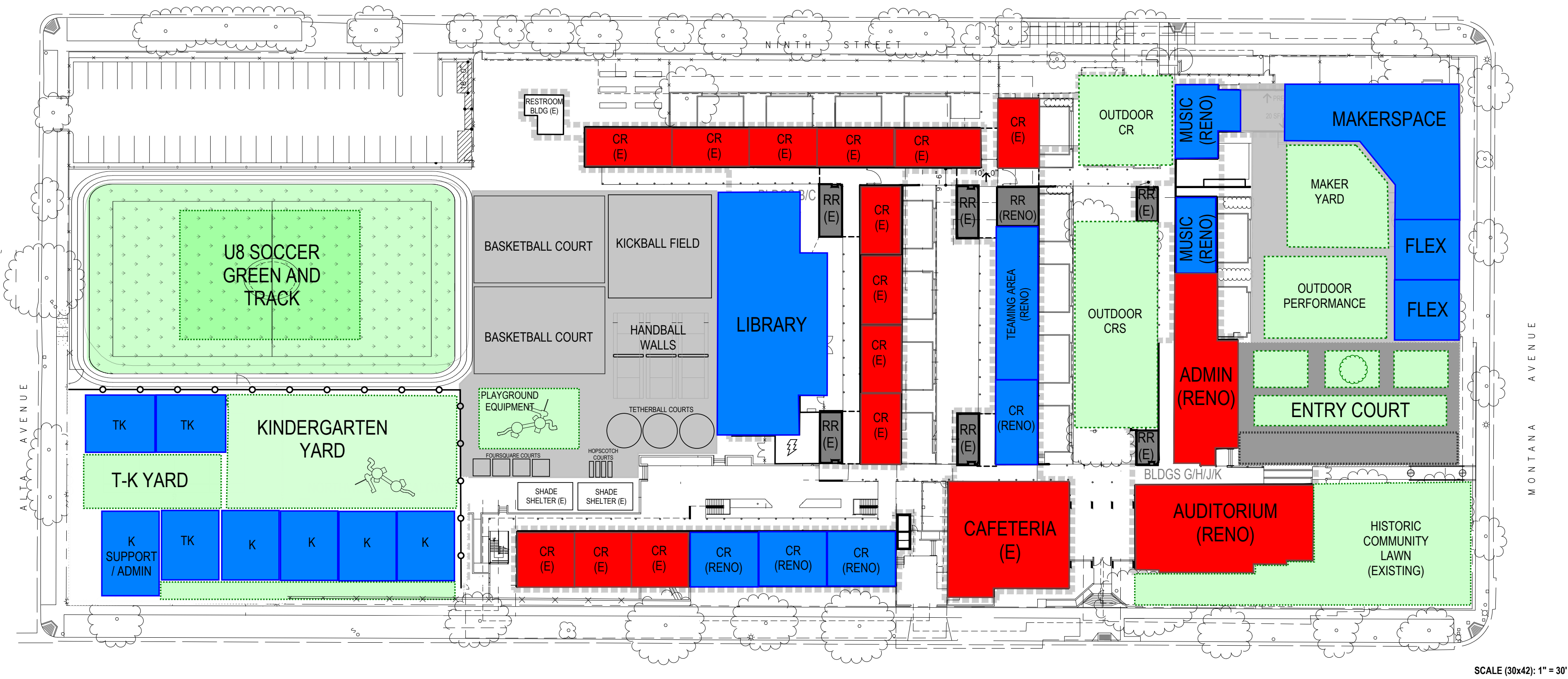
ROOSEVELT ELEMENTARY SCHOOL CAMPUS PLAN EIR

Alternative 1: Partial Campus Rehabilitation

Source: DSK Architects

Figure 4-1

This page intentionally left blank.



Key:

- MEETS ED SPECS
- DOES NOT MEET ED SPECS
- Outdoor Areas

NOT TO SCALE

Source: DSK Architects

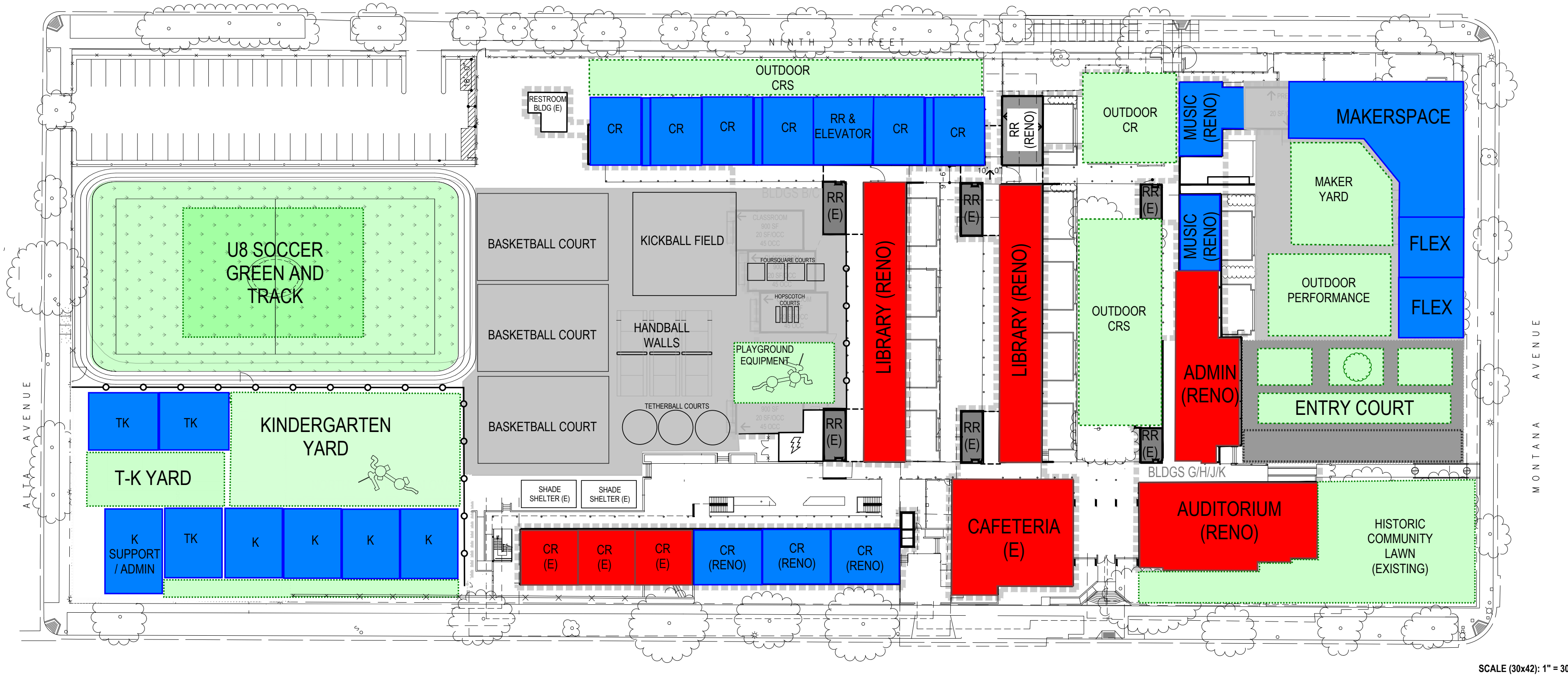
Michael Baker INTERNATIONAL

ROOSEVELT ELEMENTARY SCHOOL CAMPUS PLAN EIR

Alternative 2: Complete Preservation Plus New Development

Figure 4-2

This page intentionally left blank.



Key:

MEETS ED SPECS

DOES NOT MEET ED SPECS

Outdoor Areas

Michael Baker INTERNATIONAL

NOT TO SCALE

Source: DSK Architects

ROOSEVELT ELEMENTARY SCHOOL CAMPUS PLAN EIR

Alternative 3: Majority Preservation

Figure 4-3

This page intentionally left blank.

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines section 15126.2 requires consideration and discussion of mandatory environmental subject areas. A portion of these subject areas are discussed in **Chapter 3**, **Environmental Analysis**, of this EIR, including Energy (refer to **Section 3.4**), as well as significant unavoidable environmental impacts. This section discusses the following topics:

- Significant Unavoidable Environmental Impacts
- Significant Irreversible Commitment of Resources
- Effects Found Not to be Significant
- Growth-Inducing Impacts

5.2 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, section 15126.2(c) states:

> Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

The impact analysis presented in Chapter 3, Environmental Analysis, discloses the environmental impacts of the Proposed Project in detail, including adverse impacts that would remain significant even with the implementation of feasible mitigation measures.

Specifically, as analyzed in **Section 3.3**, **Cultural Resources**, the Proposed Project involves the demolition of Buildings B, C, G, and K, which are four of the six buildings that contribute to a historic district, which was found eligible for listing in the California Register of Historical Resources and at the local level, pursuant to section 15064.5 of the CEQA Guidelines. Mitigation Measures **MM CUL-1**, **MM CUL-2**, and **MM CUL-3** require documentation according to Historic American Buildings Survey Level III standards to help future researchers regarding the “Santa Monica Plan”; development of an interpretive program describing the history of the “Santa Monica Plan” and Roosevelt Elementary School; and retainment of a historic architect meeting the Secretary of the Interior’s Historic Preservation Professional Standards in historic architecture to review the proposed rehabilitation plans for the remaining contributing historic features, including Building E, Building J, and the South Courtyard, to ensure the appropriate treatment of the character-defining features. Although these measures would mitigate impacts to historical resources at the campus to the greatest extent feasible, such measures cannot mitigate the extent of impacts to a less than significant level due to the demolition of the majority of contributing buildings.

5.2.1 Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project’s significant and unavoidable impacts, CEQA Guidelines section 15126.2(c) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts.

The reasons why the Proposed Project has been proposed pertain to the underlying purpose of the Proposed Project and the associated Statement of Objectives, as provided in Chapter 2, Project Description, of this EIR. As described therein, the purpose of the Proposed Project is to update and modernize the Roosevelt Elementary School facilities to support the adopted Districtwide Educational Specifications, which provide guidance on developing future learning environments to support new developments in technology and the expectations of the twenty-first century workforce.

As previously discussed, despite implementation of feasible mitigation measures, the impacts to historical resources cannot be reduced to less than significant levels due to the proposed demolition of the majority of the contributing buildings. As a result, impacts to historical resources cannot be alleviated without imposing an alternative design. **Chapter 4.0**, **Alternatives**, analyzes several alternative scenarios involving preservation of the historic district, including the Partial Campus Rehabilitation (Alternative 1), Complete Preservation Plus New Development (Alternative 2), Majority Preservation (Alternative 3), and the No Project/No Build (Alternative 4) scenarios. As analyzed, Alternative 1 would result in a similar level of impact to historical resources as the Proposed Project and would meet fewer of the Proposed Project Objectives. Alternatives 2, 3, and 4 would result in no impact or less than significant impact (with mitigation) to historical resources compared with the Proposed Project, and none of these alternatives would achieve most of the Proposed Project's Objectives. Refer also to **Table 4-3**, **Summary of the Alternatives' Ability to Meet Project Objectives**.

The Proposed Project is being proposed, notwithstanding its significant and unavoidable impact, to improve learning by providing properly sized learning environments to accommodate a variety of twenty-first century learning activities, such as team-based learning, multiple-classroom collaborative projects, and large-scale projects; providing expanded functions to allow for project-based and integrated approaches to learning, such as culinary education, performance, motion, and physical education, and indoor-outdoor learning opportunities; increasing parking to meet the identified shortages for the school staff's existing needs; and increasing the safety and security of the school. Achieving these would help uphold the District's mission statement, "Extraordinary achievement for all students while simultaneously closing the achievement gap" (SMMUSD 2023). Therefore, the benefits of the Proposed Project would outweigh the effects of the significant and unavoidable impacts of the Proposed Project.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES DUE TO THE PROPOSED PROJECT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be caused by the Proposed Project should it be implemented. Specifically, section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy); and/or
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Commitment of the Proposed Project's Site for Future Generations

The Proposed Project's site has operated as an existing school since 1935. Additionally, the Proposed Project's site zoning and General Plan Land Use designation is zoned Institutional/Public Lands, which is the designation for the use and development of public or semi-public facilities, such as municipal offices, schools, libraries, museums, performance spaces, cemeteries, and similar uses. The Proposed Project involves construction of new and renovation of existing structures in accordance with current building standards, which would be expected to extend the useful lifespan of the school campus. However, as the Proposed Project continues the existing use of the Project site, the Proposed Project would not result in the new commitment of the Proposed Project's site for future generations.

Large Commitment of Resources

Resources that would be consumed as a result of implementation of the Proposed Project are those used during the construction phases, which include water, electricity, natural gas, fossil fuels, and building materials, such as lumber, cement, steel copper, other metals, glass, aggregate, asphalt, and composite materials; however, the building materials would largely be used during construction and would not be further consumed during operations. Additionally, use of such resources would not be unusual compared with other construction projects and would not substantially affect the availability of such resources.

As the Proposed Project would not increase the school capacity, during operations the school would continue to use utility resources, such as water, electricity, natural gas, and other petroleum-based fuels, as well as paints, solvents, and cleaners for normal maintenance activities, similar to existing school operations.

Unjustified Consumption of Resources

Resources that would be permanently and continually consumed by implementation of the Proposed Project include water, electricity, natural gas, and other petroleum-based fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. As analyzed in **Section 3.4**, **Energy**, during construction, the Proposed Project would comply with Title 13, California Code of Regulations Section 2485 requiring that equipment not in use for more than five minutes be turned off, and the latest USEPA and CARB engine emissions standards for construction equipment.

The Proposed Project would be required to comply with energy efficiency standards set forth by Title 24 and CALGreen requirements related to energy; therefore, the new and renovated buildings would be more energy efficient than the existing structures. Furthermore, the District would continue its existing and implement additional initiatives to improve energy conservation and management. These measures would decrease electricity and gas consumption. As a result, the Proposed Project would not result in an unjustified consumption of resources.

Irreversible Environmental Damage

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage that could be caused by an accident associated with the Proposed Project. As analyzed in **Section 3.8**, **Hazards and Hazardous Materials**, the Proposed Project could result in the use, transport, storage, and disposal of limited amounts of hazardous wastes (for instance in building materials or VOCs from former historic uses near the Proposed Project site) during construction. However, with implementation of **MM HAZ-1** through **HAZ-3** and compliance with applicable state and federal laws related to hazardous materials, the likelihood and severity of accidents that could result in irreversible environmental damage would be considered less than significant.

In summary, implementation of the Proposed Project would involve irreversible environmental changes to existing natural resources, such as the commitment of energy and water resources as a result of the operation and maintenance of future development. However, the Proposed Project would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts would also occur with new construction. Therefore, the use of energy related to the Proposed Project would occur in an efficient manner.

5.4 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

Public Resources Code (PRC) section 21003(f) states:

> …it is the policy of the state that…[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.

This policy is reflected in CEQA Guidelines section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant effects of the proposed project on the environment," and section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." The CEQA Guidelines allow use of an Initial Study to document project effects that are less than significant (CEQA Guidelines, §15063[a]). CEQA Guidelines section 15128 requires that an EIR "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in this EIR."

The Initial Study/Notice of Preparation (IS/NOP) prepared for the Proposed Project in September 2023 determined that impacts listed below would result in either no impact or less than significant impacts. As a result, they have not been further analyzed in this EIR. The IS/NOP is included as **Appendix A** of this EIR and may be referenced for the analyses and explanations of the basis of these conclusions. The following **Table 5-1**, **Impacts Found Not to Be Significant**, presents the impact categories and questions directly from the CEQA Guidelines Appendix G Environmental Checklist as contained in the IS/NOP and identifies the impacts not found to be significant.

TABLE 5-1. IMPACTS FOUND NOT TO BE SIGNIFICANT

Environmental Issues		Initial Study Determination
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the Project:		
a)	Have a substantial adverse effect on a scenic vista?	No impact
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No impact
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
2. AGRICULTURAL 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?	No impact
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact
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))?	No impact
d)	Result in the loss of forestland or conversion of forestland to non-forest use?	No impact
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?	No impact
3. 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:		
d)	Result in emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than significant
4. BIOLOGICAL RESOURCES. Would the Project:		
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	Less than significant
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
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?	No impact
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

TABLE 5-1, CONTINUED

Environmental Issues		Initial Study Determination
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant
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
5. CULTURAL RESOURCES. Would the Project:		
c)	Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant
6. 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.	No impact
ii)	Strong seismic ground shaking?	Less than significant
iii)	Seismic-related ground failure, including liquefaction?	Less than significant
iv)	Landslides?	No impact
b)	Result in substantial soil erosion or the loss of topsoil?	Less than significant
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
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
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
9. HAZARDS AND HAZARDOUS MATERIALS. Would the Project:		
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant
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
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
f)	Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	No impact
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	No impact

TABLE 5-1, CONTINUED

Environmental Issues		Initial Study Determination
10. HYDROLOGY AND WATER QUALITY. Would the Project:		
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant
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
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:	Less than significant
i)	Result in substantial erosion or siltation on- or off-site;	Less than significant
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
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
iv)	Impede or redirect flood flows?	Less than significant
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No impact
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant
11. LAND USE AND PLANNING. Would the Project:		
a)	Physically divide an established community?	No impact
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
12. 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?	No impact
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
13. NOISE. Would the Project result in:		
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact
14. 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)?	No impact
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No impact

TABLE 5-1, CONTINUED

	Environmental Issues	Initial Study Determination
15.	**PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:**	
a)	Fire protection?	Less than significant
b)	Police protection?	Less than significant
c)	Schools?	Less than significant
d)	Parks?	Less than significant
e)	Other public facilities?	No impact
16.	**RECREATION**	
a)	Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant
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?	Less than significant
17.	**TRANSPORTATION. Would the Project:**	
b)	Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	Less than significant
d)	Result in inadequate emergency access?	Less than significant
19.	**UTILITIES AND SERVICE SYSTEMS. Would the Project:**	
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant
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
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
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
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than significant
20.	**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?	No impact
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

TABLE 5-1, CONTINUED

Environmental Issues		Initial Study Determination
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
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

5.5 GROWTH-INDUCING IMPACTS

Pursuant to section 15126.2(e) of the CEQA Guidelines, an EIR must discuss "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth…. Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also… the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively."

To address this issue, potential growth-inducing effects were examined through analysis of the following questions:

- Would this Proposed Project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the Proposed Project's area or through changes in existing regulations pertaining to land development)?
- Would this Proposed Project result in the need to expand one or more public services to maintain desired levels of service?
- Would this Proposed Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this Proposed Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

It should be noted that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which the Proposed Project could contribute to significant changes in the environment beyond the direct consequences of development, as examined in the preceding sections of this EIR.

Would this Project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?

The Proposed Project would renovate and modernize the facilities on the existing Roosevelt Elementary School campus. The Proposed Project includes improvements to educational facilities that would accommodate the current and future use of the elementary school that serves the surrounding community. The Proposed Project site is in an urban area served by existing infrastructure, including water mains, sewer mains, electricity, and natural gas services. The Proposed Project would not change the designated land use of the Proposed Project's site and would not change the existing regulations pertaining to land development. The Proposed Project would not remove obstacles to growth and, thus, would not result in growth-inducing impacts.

Would this Project result in the need to expand one or more public services to maintain desired levels of service?

The Proposed Project would renovate and modernize the Roosevelt Elementary School campus to serve the existing student population and would not increase school capacity. Therefore, the Proposed Project would not require expansion of facilities and personnel for fire protection, police services, or other public services to maintain desired levels of service and, thus, would not result in growth-inducing impacts.

Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

The Proposed Project's construction workers would be drawn from the regional labor force and would not attract new workers to the region. Operation of the Proposed Project would accommodate the existing school capacity and would not result in an increase in the number of staff. The Proposed Project would not change the educational use on the campus. Implementation of the Proposed Project at the school would not encourage or facilitate economic effects that would result in other activities that could affect the environment and, thus, would not result in growth-inducing impacts.

Would approval of this Project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The Proposed Project would renovate and modernize facilities at the existing Roosevelt Elementary School campus to align with SMMUSD's 2019 Districtwide Educational Specifications for developing future learning environments. School enhancement and rebuild projects and programs are common statewide and nationwide. District approval would not set a precedent that could encourage and facilitate local and regional activities and government actions that could significantly affect the environment and, thus, would not result in growth-inducing impacts.

6.1 EIR PREPARATION

Santa Monica Malibu Unified School District – EIR Oversight

Carey Upton .... Chief Operations Officer
Julian Capata .... Director of Projects Facility Improvement Projects
Barbara Chiavelli..................................... Facility Improvement Projects

Legal Council

Stan M. Barankiewicz II, Esq. .... Orbach Huff & Henderson LLP

Campus Plan

Abby CalloSawyer, R.A. NCARB .... dsk Architects
Jeff Fuller, AIA, NCARB .... dsk Architects
James O'Connor, PAIA .... Moore Ruble Yudell Architects and Planners
Roya Chagnon, AIA .... Moore Ruble Yudell Architects and Planners

Michael Baker International – EIR Consultant

John Bellas... Project Director
Jennifer Wu .... Project Manager
Nicole Marotz .... Deputy Project Manager
Zhe Chen .... EIR Preparer
John Hope... EIR Preparer
Cristina Treviso .... EIR Preparer
Ana Cotham .... Technical Editor
Hillary Heidenreich .... Graphics and Document Preparation
Jeanette Cappiello .... Graphics
Jonathan Perez .... GIS
Connor Lance.. GIS

6.2 TECHNICAL STUDIES

Historical Resources Inventory Report.... Paul Travis, Historic Resources Group
Historical Resources Technical Report ... Paul Travis, Historic Resources Group
SCCIC Records....................................... Mark Beherec, Michael Baker International
Air Quality, GHG, and Noise Analysis..... Zhe Chen, Michael Baker International
Geotechnical Investigation .... Eric M. Holliday, PG CEG 2774, Leighton Consulting, Inc.
Geotechnical Investigation .... Carl Kim, PE GE 2620, Leighton Consulting, Inc.

Phase I ESA..Eric Fraske, Senior Engineer, NV5
Pedestrian Safety Assessment ....Jordan Gray, PE TE, Michael Baker International
Pedestrian Safety Assessment ....Jacob Swim, PE, Michael Baker International

REFERENCES

Architectural Resources Group and Historic Resources Group. 2018. *City of Santa Monica Citywide Historic Resources Inventory Update Survey Report*. Prepared for the City of Santa Monica.

Historic Resources Group. 2022. Grant Elementary School | Santa Monica, CA Historic Resources Inventory Report Draft.

Ascent (Ascent Environmental). 2022. Draft Initial Study/Proposed Mitigated Negative Declaration for the John Adams Middle School Campus Improvement Project.

Bies, David A., and Colin H. Hansen. 2009. *Engineering Noise Control: Theory and Practice,* 4th ed. CRC Press.

California Department of Conservation, Division of Mines and Geology. 2000. *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report.*

Caltrans (California Department of Transportation). 2002. *Transportation Related Earthborne Vibration: Caltrans Experiences*.

———. 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol.*

———. 2019. List of eligible and officially designated State Scenic Highways. available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways Accessed September 10, 2024.

———. 2020. *Transportation and Construction Vibration Guidance Manual.*

———. 2024. Paleontology. https://dot.ca.gov/programs/environmental-analysis/paleontology.

Campbell, R. H, Wills, C. J., Irvine, P. J., and Swanson, B. J. 2014. *Preliminary geologic map of the Los Angeles 30' x 60' quadrangle, California*. California Department of Conservation, California Geological Survey, v. 2.1, scale 1:100,000.

CARB (California Air Resources Board). 2022. 2022 State Strategy for the State Implementation Plan. September 22.

———. 2023a. *ADAM Air Quality Data Statistics*. Accessed November 12, 2023. http://www.arb.ca.gov/adam/.

———. 2023b. *AQMIS2: Air Quality Data.* Accessed November 12, 2023. https://www.arb.ca.gov/aqmis2/aqdselect.php.

———. 2023c. *EMFAC 2021*. Accessed November 13, 2023.

———. 2023d. *2022 Scoping Plan for Achieving Carbon Neutrality*.

CDTFA (California Department of Tax and Fee Administration). 2023. *Net Taxable Gasoline Gallons*. Accessed November 20, 2023. https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm.

CEC (California Energy Commission). 2023a. *Electricity Consumption by County*. Accessed November 13, 2023. http://www.ecdms. energy.ca.gov/elecbycounty.aspx.

———.2023b. *Final 2022 Integrated Energy Policy Report Update*. https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update.

———. 2023c. *Natural Gas Consumption by County*. Accessed November 13, 2023. https://ecdms.energy.ca.gov/gasbycounty.aspx.

———. 2023d. *Supply and Demand of Natural Gas in California*. Accessed November 16, 2023. https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california.

City of Santa Monica. 1992. *General Plan Noise Element*. https://santamonica.gov/media/Document%20Library/Topic%20Explainers/Planning%20Resources/Noise%20Element%20-%20July%201992.pdf.

———. 2014. *Sustainable City Plan*. https://www.smgov.net/uploadedFiles/Departments/OSE/Categories/Sustainability/Sustainable-City-Plan.pdf.

———. 2016. *Pedestrian Action Plan.* https://www.santamonica.gov/pedestrian-action-plan.

———. 2020. "City of Santa Monica and SMMUSD Partner to Continue Playground Partnership." May 22. santamonica.gov - City of Santa Monica and SMMUSD Partner to Continue Playground Partnership

———. 2021a. *Transportation Impact Report for Santa Monica Housing Element Update – 6th Cycle.*

———. 2021b. *City's 6th Cycle 2021-2029 Housing Element Update Environmental Impact Report.*

———. 2023a. Safety Element Update.

———. 2023b. Roosevelt Elementary – Safe Routes to School. Accessed October 6, 2023. https://www.santamonica.gov/programs/safe-routes-to-school.

———. n.d. "Safety Element Update." https://www.santamonica.gov/safety-element-update#:~:text=The%20Safety%20Element%20will%20be,actions%20to%20mitigate%20disaster%20losses.

———. n.d. "Safe Routes to School." https://www.santamonica.gov/programs/safe-routes-to-school

Cleveland Clinic. 2024. *Asbestos Exposure and Your Health*. Accessed January 18, 2024. https://my.clevelandclinic.org/health/diseases/11394-asbestos-exposure-and-your-health.

Cogstone. 2022. *Archaeological and Paleontological Resources Assessment for the McKinley Elementary School Campus Master Plan Project, City of Santa Monica, Los Angeles County, California.*

Dsk Architects and Moore Ruble Yudell Architects & Planners. 2023. *Roosevelt Elementary School Campus Plan*.

———. 2024. https://www.smmusd/Page/5595**.**

FHWA (Federal Highway Administration). 2023. *Highway Traffic Noise Analysis and Abatement Policy and Guidance.* Accessed November 21, 2023. https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide04.cfm.

FTA (Federal Transit Administration). 2006. *Transit Noise and Vibration Impact Assessment.*

Google Earth. 2023.

HHS (US Department of Health and Human Services). 2022. National Institutes of Health. Last updated March 16, 2022. https://www.nidcd.nih.gov/health/noise-induced-hearing-loss.

HRG (Historic Resources Group). 2022. *Roosevelt Elementary School Historic Resources Inventory Report.*

———. 2024. *Roosevelt Elementary School Campus Plan Project Historical Resources Impact Assessment*.

IPCC (Intergovernmental Panel on Climate Change). 2021. *Climate Change 2021: Working Group I: The Physical Science Basis.*

Leighton Consulting, Inc. 2021. *Geotechnical Exploration Report, New Classroom Building, McKinley Elementary School, 2401 Santa Monica Boulevard, Santa Monica, Los Angeles County, California.*

———. 2023. *Geotechnical Exploration Report New T/K Classroom Building and Library, Roosevelt Elementary School, 801 Montana Avenue, Santa Monica, Los Angeles County, California.*

Michael Baker (Michael Baker International). 2022. Franklin Elementary School Campus Plan Project Initial Study/Mitigated Negative Declaration.

———. 2023. California Historical Resources Information Search.

NHTSA (National Highway Traffic Safety Administration). 2022. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026.

NPS (National Park Service). 1997. "How to Apply the National Register Criteria for Evaluation." National Register Bulletin 15.

NV5 Alta Environmental. 2023. Phase I Environmental Site Assessment.

OPR (Governor's Office of Planning and Research). 2003. *General Plan Guidelines.* https://opr.ca.gov/planning/general-plan/guidelines.html.

OHP (Office of Historical Preservation). 2023. SHRC History.

Placeworks. 2023. *McKinley Elementary School Campus Master Plan Project Draft EIR for Santa Monica-Malibu Unified School District.*

San Joaquin Valley Air Pollution Control District. 2015. San Joaquin Valley Air Pollution Control District Amicus Curiae Brief. https://www.courts.ca.gov/documents/7-s219783-ac-san-joaquin-valley-unified-air-pollution-control-dist-041315.pdf.

SCAG (Southern California Association of Governments). 2020. *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy –Connect SoCal.*

SMMUSD (Santa Monica – Malibu Unified School District). 2019. *Districtwide Plan for Sustainability*.

———. 2020. Energy Assessment Report. https://www.smmusd.org/cms/lib/CA50000164/Centricity/Domain/4187/Energy%20Fiscal%20Year%202019%20-%202020.pdf.

———. 2023. "About SMMUSD." Accessed May 13, 2024. https://www.smmusd.org/domain/2913.

South Coast AQMD (South Coast Air Quality Management District). 1993. *Air Quality Handbook.* https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

———. 2008. *Final Localized Significance Threshold Methodology.* http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf.

———. 2009. *Localized Significance Threshold Appendix C – Mass Rate LST Look-Up Tables*. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.

———. 2012. *Air Quality Management Plan*.

———. 2015. South Coast Air Quality Management District Amicus Curiae Brief. https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist-041315.pdf.

———. 2016. *Rule 1113 Architectural Coatings*. Accessed November 12, 2023. http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.

———. 2022. *2022 Air Quality Management Plan*. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16.

———. 2023. *Air Quality Significance Thresholds.*

SVP (Society of Vertebrate Paleontology). 1995. *Assessment and Mitigation of Adverse Impacts to Nonrenewable Palaeontologic Resources: Standard Guidelines*. SVP News Bulletin 163:22–27.

———. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Society of Vertebrate Paleontology. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf.

USDA (US Department of Agriculture, Natural Resources Conservation Service). 2024. Web Soil Survey. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

USEIA (United States Energy Information Administration). 2021. Table F35: Total Energy Consumption, Price, and Expenditure Estimates. https://www.eia.gov/state/seds/sep_fuel/html/fuel_te.html.

———. 2023. California End-use consumption by sector, excluding losses. Accessed November 20, 2023. https://www.eia.gov/beta/states/states/ca/overview.

USEPA (United States Environmental Protection Agency). 2023a. “Energy Independence and Security Act of 2007.” Last updated June 28, 2023. https://www.epa.gov/greeningepa/energy-independence-and-security-act-2007#:~:text=Signed%20on%20December%2019%2C%202007,and%20improve%20vehicle%20fuel%20economy.

———. 2023b. *Inventory of United States Greenhouse Gas Emissions and Sinks 1990 to 2021*. https://www.epa.gov/system/files/documents/2023-04/US-GHG-Inventory-2023-Main-Text.pdf.

———. n.d. *Carbon Monoxide Emissions*. Accessed November 12, 2023. https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10.

Western Regional Climate Center (WRCC). 2023. https://wrcc.dri.edu/.

This page intentionally left blank.