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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Franklin Elementary School Campus Plan Project

Draft Initial Study/Mitigated Negative Declaration

Prepared for:
SANTA MONICA-MALIBU
UNIFIED SCHOOL DISTRICT
Facility Improvement Projects
1717 4th Street
Santa Monica, CA 90401

MARCH 2025

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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

FRANKLIN ELEMENTARY SCHOOL CAMPUS PLAN PROJECT

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Prepared for:

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT
FACILITY IMPROVEMENT PROJECTS
1717 4TH STREET
SANTA MONICA, CALIFORNIA 90401

Prepared by:

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MARCH 2025

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ACRONYM LIST

AB	Assembly Bill
ACM	asbestos-containing material
ADT	average daily traffic
AFY	acre-feet per year
ALUC	Airport Land Use Commission
AQMP	Air Quality Management Plan
asml	above mean sea level
BAU	business as usual
BMP	best management practices
˚C	Celsius
CAAP	Climate Action and Adaption Plan
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalFIRE	California Department of Forestry and Fire Protection
CalGEM	California Geologic Emergency Management Division
CALGreen	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CCS	(City of Santa Monica) Community & Cultural Services Department
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEC	California Energy Commission
CEI	Continuous Energy Improvement Program
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Society
CH_4	methane
CHPS	Collaborative for High Performance Schools
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CREST	Childcare, Recreation, Enrichment, Sports, Together
CRHR	California Register of Historic Resources
CRIA	Community Revitalization and Investment Authorities
dBA	A-weighted decibel scale
DOC	(California) Department of Conservation
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
ECHO	Enforcement and Compliance History Online
EDR	Environmental Database Report

EI	expansion index
EIFD	Enhanced Infrastructure Financing District
EIR	Environmental Impact Report
EMS	Emergency Management System
EPA	United States Environmental Protection Agency
EPP	Environmentally Preferable Purchasing
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHSZ	fire hazard severity zone
FINDS	Facility Index System/Facility Registry System
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FY	fiscal year
g	gravity
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
HIST AUTO	Historical Auto Stations
HREC	historic recognized environmental condition
HQTA	High-Quality Transit Area
HRI	Historic Resources Inventory
HVAC	heating, ventilation, and air conditioning
HWTS	Hazardous Waste Tracking System
IEPR	Integrated Energy Policy Report
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study/Mitigated Negative Declaration
LADWP	(City of) Los Angeles Department of Water and Power
LBP	lead based paint
lbs	pounds
LCFS	Low Carbon Fuel Standard
LID	low-impact development
LRA	Local Responsibility Area
LUCE	Land Use Circulation Element
L_{dn}	day-night average sound level
L_{eq}	equivalent continuous sound level
L_{max}	maximum instantaneous noise level
LST	Localized Significance Thresholds
LUCE	Land Use and Circulation Element
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MS4	Storm Drain Municipal Separate Storm Sewer System Permit
MT	metric tons
$MTCO_2e$	metric tons CO_2 equivalent
MWD	Metropolitan Water District

MWh	megawatts per hour
N_2O	nitrous oxide
ND	Negative Declaration
NMA	Neighborhood Mobility Area
NO_x	nitrogen oxide
NOD	Notice of Determination
NPDES	National Pollutant Discharge Elimination System
O_3	Ozone
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyls
PDF	Project Design Feature
PDT	Pacific Daylight Time
PGA	peak ground acceleration
PGA	priority growth area
PL	Public Lands Zoning District
PM	particulate matter
PM_{10}	particulate matter 10 micrometers or less in diameter
$PM_{2.5}$	particulate matter 2.5 micrometers or less in diameter
ppm	parts per million
PPV	peak particle velocity
PST	Pacific Standard Time
PV	photovoltaic
R2	Residential Zoning District
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
ROG	reactive organic gas
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Strategy/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCP	Sustainable City Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SMFD	(City of(Santa Monica Fire Department
SMFZ	Santa Monica Fault Zone
SMGB	Santa Monica Groundwater Basin
SMMC	(City of) Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Unified School District (District)
SMPD	(City of) Santa Monica Police Department
SMPL	(City of) Santa Monica Public Library
SMURRF	Santa Monica Urban Runoff Recycling Facility

SO_2	sulfur dioxide
SOI	Sphere of Influence
SRA	State Responsibility Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TPA	Transit Priority Area
USEPA	US Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VEC	vapor encroachment condition
VES	vapor encroachment screening
VMT	vehicle miles traveled
VOC	volatile organic compound
ZNE	zero net energy

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1. INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

The Santa Monica-Malibu Unified School District (SMMUSD or District) performed a facilities assessment of Franklin Elementary School in order to update the campus to align with its Educational Specifications, which the SMMUSD Board adopted in 2019. The assessment identified priority and future improvements to be implemented, which provided the basis for the long-range *SMMUSD Franklin Elementary School Campus Assessment, Planning and Design Final Report* (November 20, 2020) (Proposed Project).

When fully implemented, the Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility over four phases (phase 1 [1A and 1B] and phases 2 to 4). The District intends to move forward with design and engineering of the first phase of funded activities; later phases of the Proposed Project would occur at the District's discretion when funding becomes available. Implementation of the Proposed Project would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change.

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

1.2 LEAD AGENCY

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

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of the IS/MND is to evaluate the potential environmental impacts of the Proposed Project. This document is divided into the following sections:

- **1.0 Introduction** – This section provides an introduction and describes the purpose and organization of the document.
- **2.0 Project Information** – This section includes general information regarding the Proposed Project, including the Proposed Project name, lead agency and address, contact person, brief description of the Proposed Project location, General Plan land use designation and zoning district, identification of surrounding land uses, and identification of other public agencies whose

review, approval, and/or permits may be required. Also listed in this section is a checklist of the environmental factors that are potentially affected by the Proposed Project.

- **3.0 Project Description** – This section provides a detailed description of the Proposed Project.
- **4.0 Environmental Checklist** – This section describes the environmental setting and overview for each of the environmental issue areas, and analyzes the potential environmental effects of implementing the Proposed Project.

  CEQA Guidelines section 15063 describes the process of preparing an IS and section 15064 provides guidance to determine if a project will have a significant effect on the environment that would necessitate preparation of an EIR. The Proposed Project, as described in Section 3.0, Project Description, would not result in conditions outlined in CEQA Guidelines section 15064 requiring preparation of an EIR. Accordingly, the checklist in Section 4.0 provides the substantial evidence required to support the finding that this IS/MND is the appropriate environmental document to adequately evaluate the environmental impacts of the Proposed Project.
- **5.0 References** – This section identifies documents, websites, people, and other sources consulted during the preparation of this IS/MND.

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

Each environmental issue area is organized in the following manner:

- The **Overview** summarizes the existing conditions at the regional, subregional, and local levels, as appropriate, and identifies applicable plans and technical information for the particular issue area.

- The **Checklist Discussion/Analysis** provides a detailed discussion of each of the environmental issue checklist questions based on Appendix G of the CEQA Guidelines. The level of significance for each topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are assessed in this IS/MND:
    - **No Impact:** No project-related impact to the environment would occur with Project development.
    - **Less than Significant Impact:** The impact would not exceed the applicable significance thresholds.
    - **Less than Significant Impact with Mitigation Incorporated:** The impact, through the incorporation of mitigation measures, would reduce the project-related impact to a less-than-significant level.
    - **Potentially Significant Impact:** The impact is considered potentially significant if the Proposed Project is anticipated to exceed identified significance thresholds of an environmental issue area, potentially resulting in an adverse impact to the environment.

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2. PROJECT INFORMATION

1. **Project title:** Franklin Elementary School Campus Plan Project

2. **Lead agency name and address:** Santa Monica-Malibu Unified School District
1717 4th Street
Santa Monica, California 90401

3. **Contact person and phone number:** Carey Upton
Chief Operations Officer
Phone: 310-450-8338 x79383

4. **Project location:** 2400 Montana Avenue (between 23rd Place and 24th Place)
Santa Monica, California 90403
Latitude 34º02'20.49"N, Longitude 118º29'02.79"W
Section 31 Township 01 South Range 15 West San Bernardino Meridian
Assessor Parcel Number (APN) 4277-002-901

5. **Project sponsor's name and address:** Santa Monica-Malibu Unified School District
1717 4th Street, Santa Monica, California 90401

6. **General Plan designation:** Institutional/Public Lands (main school campus) and Low Density Housing (adjacent satellite facility)

7. **Zoning:** Public Lands (PL) (main school campus) and Low Density Residential (R2) (adjacent satellite facility)

8. **Description of the Project:**

The Santa Monica-Malibu Unified School District (SMMUSD or District) performed a facilities assessment of Franklin Elementary School in order to update the campus to align with its Educational Specifications, which the SMMUSD Board adopted in 2019. The assessment identified priority and future improvements to be performed, which formed the basis for the long-range SMMUSD *Franklin Elementary School Campus Assessment, Planning and Design Final Report* (November 20, 2020) (Proposed Project).

At full buildout, the Proposed Project would increase the campus building area by approximately 29,286 (gross) square feet (from 63,002 square feet to 92,288 square feet), with new classrooms and increased storage space, and create flexible teaming spaces, which can be split into additional classrooms during the phased implementation. The planned two-story building at the campus perimeter would open up the center of campus for better visibility and more shared activities while providing a more effective security perimeter. All existing portable buildings and two existing modular buildings would be demolished and removed entirely. Specifically, the Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility over four phases (phase 1 [1A and 1B] and phases 2 to 4).

The Proposed Project would require some removal of existing trees both on campus and within the public right-of-way (off-site). To accommodate full buildout of the Proposed Project, it is estimated that a total of 20 on-site trees and 2 off-site trees (all ornamental and nonnative) would be removed; however, tree removal for Phases 2 to 4 would ultimately be confirmed as redevelopment of the campus occurs over time. The proposed improvements planned for Phase 1 would require removal of 11 existing trees relative to the main school campus and 3 existing trees relative to the satellite campus. At ultimate buildout of the Campus Plan, the number of newly planted trees on the campus would exceed the number of trees removed to allow for the planned improvements. Refer to Section 3.0, Project Description, for additional details on anticipated tree removal, as well as **Figure 3-5, Tree Protection Plan,** which shows the existing tree locations and species.

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

9. Surrounding land uses and setting:

Residential uses surround the campus on all four sides. The uses are predominantly single-unit residential structures, with some multifamily residences located to the northeast and southwest along Montana Avenue. Brentwood Country Club Golf Course is located approximately 0.25 miles to the northeast, adjacent to which is Brentwood Science Magnet Elementary School, which is 0.9 miles northeast of Franklin Elementary School. McKinley Elementary School and Lincoln Middle School are located 0.5 miles southeast and 0.6 miles southwest, respectively, of the Franklin Elementary School campus. Douglas Park is located approximately 0.25 miles southeast of the campus.

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

State of California

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

11. Environmental factors potentially affected:

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

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

12. Determination: (to be completed by the lead agency)

On the basis of this initial evaluation:

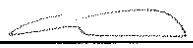
☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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



Signature

3/3/25

Date

Carey Upton

Printed Name

Santa Monica-Malibu Unified School District

Lead Agency

Chief Operations Officer

Title

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3. PROJECT DESCRIPTION

3.1 PROPOSED PROJECT'S LOCATION

Franklin Elementary School is located at 2400 Montana Avenue in the City of Santa Monica, as shown on **Figure 3-1**, **Regional Vicinity Map**, and **Figure 3-2**, **Project Vicinity Map**. The main entrance to the campus is off of Montana Avenue, which bounds the school campus on the northwest. The main campus is bordered by 23rd Place to the southwest, 24th Place to the northeast, and Idaho Avenue to the southeast. The school includes a satellite, transitional kindergarten and kindergarten (TK/K) facility next to the main campus on the northeast side of 24th Place, along Montana Avenue. The Franklin Elementary School campus is three blocks, or approximately 2,000 feet, northwest of Wilshire Boulevard, approximately 1.25 miles north of Interstate 10, approximately 2 miles southwest of Interstate 405, and approximately 1.75 miles northeast of Santa Monica State Beach and the Pacific Coast Highway. The Franklin Elementary School campus is located in an urbanized residential area on fairly level topography. Refer also to **Figure 3-3**, **Aerial Photograph**.

3.2 PROPOSED PROJECT'S BACKGROUND

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 twenty-first century 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 programs 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 new shared spaces that do not currently exist. The redesigned campus would have more square footage of interior space.

Following adoption of the Educational Specifications, the District assessed the Franklin Elementary School campus and identified priority and future improvements that would update the campus to align with the Educational Specifications. These improvements provide the basis for the long-range *Franklin Elementary School Campus Assessment, Planning and Design Final Report* (November 20, 2020). This report presented a draft program for the campus to implement the goals of the Educational Specifications. The findings of

the draft assessment were evaluated alongside other District priorities and realities, including the need for recreational/open space, budget, scheduling, phasing, and the historical resources analysis. Additionally, in February 2021, the District adopted Board Policy 7113.1 (amended in September 2024) and the accompanying Administrative Regulation 7113.1, 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 on a school campus prior to, or at the onset of, the planning and design process. Pursuant to Board Policy 7113.1, a Historic Resources Inventory Report was completed in 2021 by Architectural Resources Group to evaluate potential historical resources on the school campus. Following this additional analysis and site/community meetings, the Board of Education defined the scope of the Franklin Elementary School Campus Plan Project (Campus Plan or Proposed Project).

3.3 EXISTING USE AND CONDITIONS

The Proposed Project site is located in central Santa Monica in an urbanized residential and built-out portion of the City; refer to **Figure 3-2**, **Project Vicinity Map**. The existing campus is approximately 5.6 acres and has been developed with eight permanent buildings, seven portable buildings, and two modular buildings, totaling approximately 63,002 square feet of developed building area. Franklin Elementary School dates to 1924, when it was originally designed as a two-story schoolhouse with eight rooms. As with most public schools in Santa Monica and in Southern California, Franklin Elementary School sustained extensive structural damage as a result of the 1933 Long Beach earthquake. Subsequently, the school was reconstructed and the campus has since been developed over decades, with the reconstruction of the Main Building along Montana Avenue, completed in 1937; the Cafetorium and some of the central campus classroom buildings built around 1948; the satellite TK/K campus developed into its current layout in 1952; the library constructed in 1970; a series of modular buildings added in 1975; portable buildings added in the 1990s; and a three-classroom modular building and additional portables added around 2000.

Given the relatively small area, the campus was built out in a linear manner from Montana Avenue toward Idaho Avenue, where new buildings were erected as close to existing buildings as the Santa Monica Municipal Code allowed. As a result, there are no sightlines through the middle of campus, and it is difficult to develop outdoor learning areas in the Code-constrained gaps between the buildings. The modular and portable buildings are in poor condition, and the remaining buildings are in fair to good condition due to modernizations in 2000 and 2018. The structural design of most of the buildings does not support cost-effective renovations to create larger classrooms. Additionally, as mentioned, following the 1933 Long Beach earthquake, the school was reconstructed, including the Main Building, for which the reconstruction was designed by architects Marsh, Smith and Powell in 1936. The Historical Resources Inventory Report found the Main Building, together with the front lawn, to be individually eligible for listing as a historical resource in the California Register of Historical Resources and for local (City of Santa Monica) listing. However, the Main Building is not considered individually eligible for the National Register of Historic Places due to its alteration and the compromised integrity over the decades. Refer to **Figure 3-4**, **Existing Campus**, for an illustration of the existing Franklin Elementary School campus.

The main entry to the campus and student drop-off/pickup area is located along Montana Avenue. A small staff parking lot with 28 spaces and additional pedestrian entry point is located at the southwest corner of the campus along 23rd Place and Idaho Avenue, as shown on **Figure 3-4**, **Existing Campus.** Classes begin

at 8:30 a.m. Monday through Friday. Class is dismissed for kindergarten at 1:30 p.m. on regular days and at 11:30 a.m. on minimum days. First and second grades are dismissed at 2:45 p.m. on regular days and at 1:30 p.m. on Wednesdays and minimum days. For the remaining grades (third through fifth), class is dismissed at 3:00 p.m. on regular days and at 1:30 p.m. on Wednesdays and minimum days.

Additionally, the school provides before- and after-school programs throughout the year. These include the following: Full Time Childcare (and AM Care for a morning-only option), with before-school care from 7:00 a.m. until the regular school day begins at the first bell, and continuing from school dismissal until 6:00 p.m.; Early Express, which is an after-school part-time option operating from the time of kindergarten dismissal until 3:00 p.m., which is designed for parents who need childcare for their kindergartner until an older sibling is dismissed from school; Childcare, Recreation, Enrichment, Sports, Together (CREST), which is an after-school care program for fourth- and fifth-grade students in which participants receive homework assistance, structured indoor/outdoor activities, and local field trips, and taking place from school bell dismissal until 6:00 p.m.; and Enrichment, which is a variation of classes being offered once per week in the fall, winter, and spring for students in all grades.

Franklin Elementary School is well-integrated with its neighborhood. The City of Santa Monica and the District entered into a Master Facilities Use Agreement in May 2012 (renewed in 2022), which allows the City and the community to use the District's school facilities, including Franklin Elementary School campus. Under the Master Facilities Use Agreement, the Franklin Elementary School playfields, recreational facilities, and buildings are available for non-school programming rentals when school and school programs are not in session. The Master Facilities Use Agreement includes a Playground Partnership Agreement which provides recreation space use at Franklin Elementary School, including the playground facing Idaho Avenue, the athletic facilities (soccer field and basketball courts), and lawn areas along Montana Avenue, to Santa Monica children and families on weekends and during school breaks when school is not in session. Authorized groups may use the school facilities during the school year on weekends (Saturday and Sunday) from 9:00 a.m. to 5:00 p.m. Pacific standard time (PST) and 9:00 a.m. to 6:00 p.m. Pacific daylight time (PDT); weekdays during District holidays, 9:00 a.m. to 5:00 p.m. (with no school programming) and 2:00 p.m. to 5:00 p.m. (during school programming); weekdays during non-summer school breaks, 9:00 a.m. to 5:30 p.m. PST and 9:00 a.m. to 6:30 p.m. PDT; and weekdays during summer break, 9:00 a.m. to 6:30 p.m. (non-summer school) and 2:00 p.m. to 6:30 p.m. (during summer school). The community uses the playfield frequently, almost every day after school and every weekend. The playfields are locked at sunset and no community nighttime activities are programmed. Nighttime lighting is limited to security lighting on the buildings and to illuminate pathways on the campus.

3.4 PROPOSED PROJECT

The proposed improvements would result in redevelopment of approximately 5 acres of the 5.6-acre school campus. At full buildout, the Proposed Project would increase the campus building area by approximately 29,286 (gross) square feet (from 63,002 square feet to 92,288 square feet), with new classrooms and increased storage space, and creation of flexible teaming spaces which can be split into additional classrooms during the phased implementation. The planned two-story building at the campus perimeter would open up the center of campus for better visibility and more shared activities while providing a clearer security perimeter. All existing portable buildings and two existing modular buildings would be demolished and removed entirely. Specifically, the Proposed Project would remove and

demolish seven permanent buildings, two modular buildings, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility over four phases (phase 1 [1A and 1B] and phases 2 to 4). The main entry point to the campus would be from Montana Avenue, with two entry points along Idaho Avenue, one of which would be specific to the TK/K facilities. All of the entries would be gated and/or secured to ensure safety.

Implementation of the Proposed Project would not increase the capacity of Franklin Elementary School, and therefore would neither increase the consumption of potable water nor increase the generation of waste. Further, the school's existing enrollment boundaries would not change.

Overall, the Proposed Project would require the removal of some existing ornamental and non-native trees both on campus and within the public right-of-way (off-site). To accommodate full buildout of the Proposed Project, it is estimated that a total of 20 on-site trees and 2 off-site trees would be removed; however, tree removal for Phases 2 to 4 would ultimately be confirmed as development of the campus occurs over time. The proposed improvements planned for Phase 1 would require removal of 11 existing trees relative to the main school campus and 3 existing trees relative to the satellite campus. For the main campus, one street tree (bottle tree, *Brachychiton populneus*) within the public right-of-way would be removed along Idaho Avenue. The other 10 trees to be removed are located within the site interior and include three tipu trees (*Tipuana tipu*), two Australian willow (*Geijera parviflora*), and five rotundiloba sweetgum (*Liquidambar styraciflua 'Rotundiloba'*). For the satellite campus, one street tree within the public right-of-way (Australian willow, *Geijera parviflora*) would be removed along 25th Street. The two other trees to be removed are located within the site interior and are jacaranda (*Jacaranda mimosifolia*). Refer to **Figure 3-5, Tree Protection Plan**, which identifies the trees anticipated to be removed with each phase and the individual tree species.

The District would provide monetary payment to the City of Santa Monica for removal of the two street trees within the public right-of-way, rather than undertaking the planting of replacement trees. All trees to be removed with the Proposed Project are ornamental and are part of the existing on-site landscaping. As all such trees are non-native species, they do not represent sensitive biological resources. Additionally, at ultimate buildout of the Campus Plan, the number of newly planted trees would exceed the number of trees removed to allow for the planned improvements; however, at this time, the exact number of replacement trees is unknown at this time.

To support students who ride their bicycle to school, the Proposed Project has been designed to ensure adequate provision of on-site bicycle parking. As the improvements are implemented over time, individual bicycle parking racks may be temporarily relocated in certain areas on-site to avoid construction activity. However, the Proposed Project would accommodate a total of 52 on-site bicycle parking spaces at buildout; therefore, no net loss of bicycle parking spaces on the campus would occur. Refer also to Appendix F which identifies existing and proposed bicycle parking with the Proposed Project.

The Campus Plan would be implemented in four phases (phase 1 [1A and 1B] and phases 2-4). The District is proceeding with design and engineering of the first phase of the funded Proposed Project, with subsequent phases occurring at the District's discretion when funding becomes available. It is anticipated that full buildout of the campus would occur by 2040; however, for purposes of analysis, a condensed schedule has been considered to provide a "worst-case" scenario relative to CEQA (i.e., relative to potential generation of construction emissions, noise, etc.).

The proposed changes in the campus building area are presented in **Table 3-1**, **Summary of Existing and Proposed Facilities.** Refer also to **Figure 3-6A**, **Proposed Campus Plan Project (at Buildout)**, which provides an overview of the Proposed Project, and **Figure 3-6B, Proposed Improvement Phases**, which shows the anticipated phasing for implementation of the planned improvements. Refer also to **Figures 4.1-1** and **4.1-2** in Section 4.1, Aesthetics**,** which provide views of the existing facilities and of the proposed improvements from various off-site public vantage points.

It should be noted that construction and operation of the Proposed Project would not be subject to the policies outlined in the City of Santa Monica General Plan or zoning ordinance. Per Government Code section 53094, it is anticipated that the District School Board would pass a Resolution to exempt the Franklin Elementary School Campus Plan from City of Santa Monica General Plan and zoning ordinance provisions, at the time when the Initial Study/Mitigated Negative Declaration (IS/MND) is adopted. Therefore, the Proposed Project would not be subject to the design regulations (setbacks, maximum building height, etc.) set forth in the City's zoning ordinance. However, the Campus Plan has been designed to best abide by such design standards while still meeting the District's adopted Educational Specifications aimed at providing adequate facilities for its students.

TABLE 3-1 SUMMARY OF EXISTING AND PROPOSED FACILITIES

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size[1]	Final Conditions (Existing to Remain and New Construction with Proposed Project)[1]	Max Height (Existing/New) Under Proposed Project
Phase 1A				
Staff Parking Lot (Southwest Portion of Campus)	Demolition	30 Stalls (Includes 3 Accessible Stalls)	--	--
Soccer Field, Asphalt Track, and Basketball Court	Demolition	U-12 Field and Two Basketball Courts	--	--
Play Field *(Temporary)*	New Construction	--	140 x 160 feet (Temporary, 22,400 SF)	--
Surface Parking Lot (Southwest Portion of Campus) *(Temporary)*	New Construction	--	30 Spaces (Temporary; Includes One Accessible Stall)	--
TK/K Classroom Building; TK/K Play Yard	New Construction	--	12,859 SF	1 story; 20 feet
Phase 1B				
Building G (Kindergarten Classrooms)	Demolition	3,876 SF	--	--
Play Field and Surface Parking Lot (Temporary; Constructed in Phase 1A)	Demolition	140 x 160 Foot Temporary Play Field (22,400 SF); 30 Temporary Stalls	--	--
Play Field	New Construction	--	Synthetic Turf Soccer Green (U10) and Running Track	--
Surface Parking Lot (Faculty and Staff)	New Construction	--	37 Spaces	--

TABLE 3-1, CONTINUED

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size[1]	Final Conditions (Existing to Remain and New Construction with Proposed Project)[1]	Max Height (Existing/New) Under Proposed Project
Phase 2				
Classroom Building F	Demolition and New Construction	7,568 SF (7 Classrooms)	31,000 SF; 20 Regular Classrooms at 1,200 SF/Classroom, 2 Special Education Classrooms at 1,200 SF/Classroom, Outdoor Classrooms	2 stories;32 feet
Building B – Classroom B7	Demolition	965 SF Classroom	--	--
Portable Shade Structure (Northeastern Portion of Campus)	Removal	16 x 30 Foot Shade Shelter (480 SF)	--	--
Handball Walls	Demolition	--	--	--
North Lawn Improvements	--	--	--	--
Phase 3				
7 Portable Buildings	Demolition	8,160 SF (1,165 SF each)	--	--
Building M (Modular Classrooms)	Demolition	2,863 SF	--	--
Building D (Classrooms)	Demolition	3,000 SF	--	--
Building E (Classrooms)	Demolition	3,500 SF	--	--
Tetherball Courts, Hopscotch Courts, One Shade Structure, Restroom Building, and Playground Equipment	Demolition and New Construction	--	Four-Square Courts, 3 Handball Walls, Tetherball and Hopscotch Courts, and Playground Equipment	--
Maker-Space Building and Outdoor Maker Yard, Maker Patio, and Presentation Platform; Outdoor Classroom Space	New Construction	--	4,200 SF	1 story; 18 feet
Kitchen/Cafeteria; Indoor/Outdoor Seating	New Construction	--	7,600 SF	1 story; 18 feet
Outdoor Garden	New Construction	--	--	--
Reorient Outdoor Space to Accommodate 3 Full Basketball Courts	Renovation	1 Full and 2 Half Basketball Courts	3 Full Basketball Courts	--
Phase 4				
Building C (Library)	Demolition	2,800 SF	--	--
Building H (Classrooms)	Demolition	2,224 SF	--	--
Cafetorium	Demolition and New Construction	5,720 SF	5,000 SF; Auditorium and Outdoor Performance Area	1 story; 30 feet
Library; Book Garden	Demolition and New Construction	--	5,000 SF	1 story; 20 feet

TABLE 3-1, CONTINUED

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size[1]	Final Conditions (Existing to Remain and New Construction with Proposed Project)[1]	Max Height (Existing/New) Under Proposed Project
Flex Science/Music/Art Building	New Construction	--	4,300 SF	1 story; 20 feet
Outdoor Classroom Space	New Construction	--	--	--
Interior Improvements to 1st Floor of Administration Building	Renovation	11,100 SF	11,100 SF (Total Building SF); Includes Upgraded Administrative and Teacher Support Spaces (8,300 SF) and Restrooms (280 SF)	2 stories; 30 feet
Interior Improvements to 2nd Floor of Administration Building	Renovation	11,226 SF	Provision of Two Teaming Areas (3,600 SF); One Special Education Classroom (1,800 SF)	2 stories; 30 feet
Lawn Improvements along Montana Avenue	Renovation	--	--	--
TOTAL SQUARE FOOTAGE OF PROPOSED PROJECT				
Square Footage Totals:	*Demolition*		40,676 SF	
	New Construction		69,959 SF	
	Renovation		22,326 SF	

Source: dsk Architects 2024

1. SF = square feet; all square footage shown is gross square feet.

The District is proceeding with design and engineering of phase 1 (1A and 1B) of the funded activities, while later phases of the Proposed Project would occur at the District's discretion when funding becomes available. The Proposed Project's activities by phase are summarized below.

Phase 1A of the Proposed Project would include demolition of the existing staff parking lot located in the southwest corner of the site, as well as the soccer field, asphalt track, and basketball court. A temporary play field (approximately 160 feet by 140 feet) would be constructed on a portion of the former parking lot. A temporary surface staff parking lot (accommodating 30 spaces, including one accessible stall) would also be provided in the southwest portion of the site, accessed from the existing alley to the west. The TK/K Classroom Building would be constructed along Idaho Avenue and 24th Place; the eastern extent of the new building would be set back approximately 5 feet from the adjacent alley. The new building would encapsulate a TK/K play yard. Fencing would enclose the parking lot along the perimeter from the 23rd Place alley and Idaho Avenue, and terminate at the new TK/K Classroom Building. Additionally, a fire truck access and turnaround on the school campus would be provided from Idaho Avenue to ensure continued provision of adequate emergency vehicular access.

Phase 1B would involve demolition of the existing kindergarten classrooms (Classroom Building G) in the satellite campus. Additionally, the temporary field and temporary surface parking lot constructed as part of phase 1A would be demolished. A surface parking lot accommodating 37 spaces would be constructed in place of the former kindergarten classrooms, with access from 25th Street to the east. Although access

to the west of the parking lot to/from 24th Place would be provided, such access would be gated and is not intended for daily use. Access to the parking lot from 24th Place would be limited to special circumstances, such as periodic events held at the school. The parking lot would be dedicated to faculty and staff parking. Additionally, phase 1B would include construction of a permanent synthetic turf soccer green (U10 soccer green) and running track in the southwest portion of the site.

Phase 2 would include demolition of Classroom Building F, which has a total of seven classrooms, and removal of a portable shade structure in the northeastern portion of the campus. The existing handball walls in the eastern portion of the site would also be removed. Phase 2 would result in construction of a replacement two-story classroom building, consisting of twenty regular classrooms for grades one to five and two special education classrooms, along with two sets of restrooms and an elevator lobby. The eastern extent of the new two-story building would be set back approximately 10 feet from the adjacent alley. Outdoor classroom programs would be provided along the western side of the building within the interior of the campus. Improvements to the adjoining lawn to the north of the building are proposed, along with installation of fencing as necessary to secure the perimeter of the campus.

Phase 3 would include demolition of existing facilities located in the central portion of the campus, including a number of portable buildings, Building M (modular classrooms) and Buildings D and E (classrooms), tetherball courts, hopscotch courts, a shade structure, restroom building, and playground equipment. Phase 3 would result in construction of a new one-story Maker-Space building and outdoor Maker Yard, Maker Patio, and presentation platform, along with outdoor classroom space. The Maker-Space building would provide two Maker "studios" designed to provide flexible uses for science laboratory, art studio, and other creative and collaborative project work. Additionally, a new kitchen/cafeteria, an outdoor garden, and outdoor dining space would be provided, as well as mechanical space. New foursquare courts, handball walls, tetherball and hopscotch courts, and playground equipment would be installed. Improvements would also include reorienting the outdoor space to accommodate three full basketball courts (from the existing one full and two half basketball courts).

Phase 4 would involve demolition of the existing library (Building C) and modular classrooms (Building H) in the western portion of the campus, adjacent to the existing alley. A new library, music and flex science/art building, and auditorium would be constructed, and outdoor performance space provided. Outdoor classroom space and a book garden would also be constructed. During this phase, the main building would undergo interior renovations on the first floor to upgrade the administrative and teacher support spaces and restrooms. Additionally, interior improvements on the second floor of the administration building would include provision of two teaming areas and a special education classroom. Enhancements to the existing lawn adjacent to Montana Avenue would occur, and additional fencing would be installed.

Walls and Fencing

The Proposed Project as designed would require construction of new and/or improvements to existing walls and fencing on-site. The eastern boundary of the main campus along 24th Place (alleyway) is currently built with a combination of retaining wall with chain link fencing, which would be replaced with a similar retaining wall and fencing that would reach a total height of 11 feet. The new TK/K Classroom Building would serve as the retaining wall on the Idaho Avenue and 24th Place alley frontages.

The existing retaining wall on Idaho Avenue would be replaced following installation of the new U10 soccer field and track; this retaining wall would extend up to 2 feet above the grade of the sidewalk. Perimeter fencing would be installed along the boundary of the playfield for security purposes (as well as to prevent the escape of balls and other objects from the campus). The fencing along the perimeter of the playfield would have a height of 8 feet (as viewed from on-site) along Idaho Avenue, and would have netting up to 12 feet to intercept balls from the playfield. Combined with the height of the retaining wall, the wall/fence (as viewed from Idaho Avenue) would reach a maximum height of 9.5 feet. It should be noted that no increase in overall height would occur with the Proposed Project's implementation, as the combined height of the proposed wall/fence would be lower than the existing fence.

A new retaining wall would also be constructed along the 23rd Place alley, along the western side of the U10 soccer green. The lower grade of the wall would extend from Idaho Avenue to the northwest along the alley, reaching a height of up to 4.5 feet toward the center of the campus. The new soccer field and track would be set at a lower elevation than the adjacent 23rd Place alley and the existing grade (north of the field), resulting in the retaining wall rising approximately 6 inches above the finished grade of the alley along 23rd Place. The combined maximum height of this new retaining wall and fence would be approximately 8 feet, as viewed from the alleyway.

Additionally, fencing would be installed or replaced in various areas on-site, such as at the TK/K facilities and along the northeastern boundary. New fencing would also be installed on-site (during Phase 4) just south of the Maker-Space area, generally spanning the campus from the library to the new Classroom Building. Such fencing would only be closed after school hours, allowing the public to use the playfield while securing access to the remainder of campus.

Construction Schedule and Activities

As stated, construction would occur over four sequential phases (phases 1A and 1B, and phases 2 to 4). The estimated construction schedule for each phase is shown in **Table 3-2**, **Construction Schedule**. Because the school campus has been fully developed, construction of each phase would generally involve demolition of some existing structures, followed by minor grading and foundation work, building construction, and architectural coating. Construction of several outdoor spaces and other school facilities would include converting some existing grassy areas into hardscape or else replacing hard surfaces with landscaping.

Construction of the Proposed Project would temporarily generate additional traffic on the existing area roadway network, specifically construction workers traveling to and from the campus and delivery trips associated with construction equipment and materials. During the time frames when construction occurs while school is in session, construction traffic would be scheduled in coordination with school operations, so that trucks are not moving in or out during drop-off or pickup times. 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 will be 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.

TABLE 3-2 CONSTRUCTION SCHEDULE

Phase	Construction Start	Completion	Duration
Phase 1A	June 2026	December 2027	18 months
Phase 1B	January 2028	August 2028	8 months
Phase 2	June 2027	September 2029	27 months
Phase 3	June 2029	June 2031	24 months
Phase 4	June 2031	February 2034	20 months

Source: SMMUSD 2024

3.5 REQUIRED PERMITS AND APPROVALS

A list of the agencies expected to use the environmental analysis of the Proposed Project included herein in their decision-making is provided below. Anticipated permits and other approvals required to implement the Proposed Project are also identified.

Lead Agency

Pursuant to CEQA Guidelines section 15367, the District is the lead agency under CEQA and is carrying out the Proposed Project. In order to approve the Proposed Project, the District's Board must first adopt the final IS/MND and adopt the Project Mitigation Monitoring Reporting Program. The Board will consider the information in the IS/MND 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 stated significance findings and mitigation measures. The IS/MND 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 Agency Approvals

The following is 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 Land 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)
  - Fire Department and Police Department (approval of Site Plan for Emergency Access)
  - Construction traffic control plan

PN: 187261

Project Location

Michael Baker INTERNATIONAL

N

0 2.5 5 10 Miles

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

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Regional Vicinity Map

Figure 3-1

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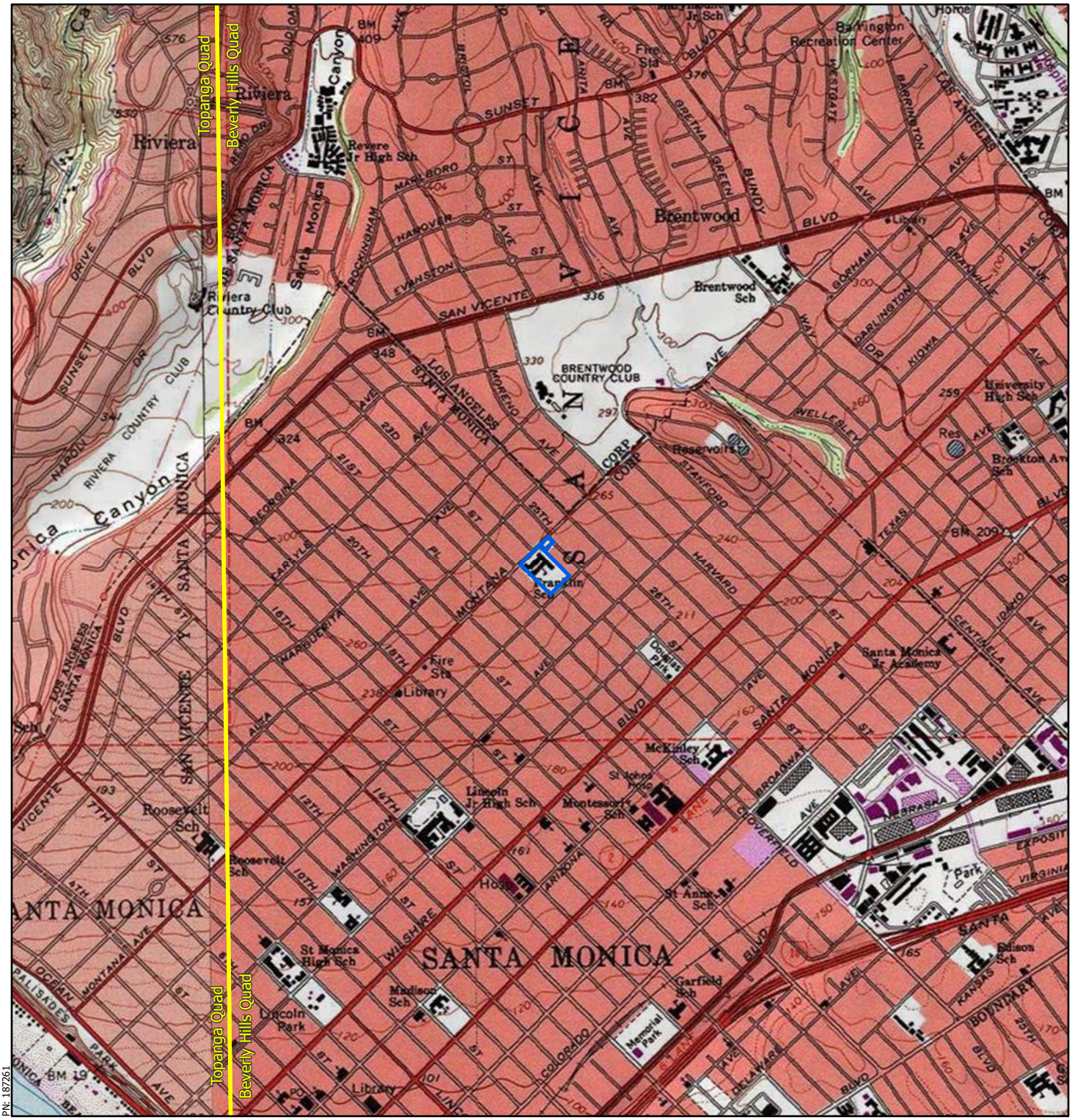

PN: 187261

Project Area

Michael Baker INTERNATIONAL

N

0 0.25 0.5 1 Miles

Source: Esri, ArcGIS Online, USGS 7.5-Minute topographic quadrangle maps: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Project Vicinity Map

Figure 3-2

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Project Area

Michael Baker INTERNATIONAL

File: 187261Exhibits.indd

0 50 100 200 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Aerial Photograph

Figure 3-3

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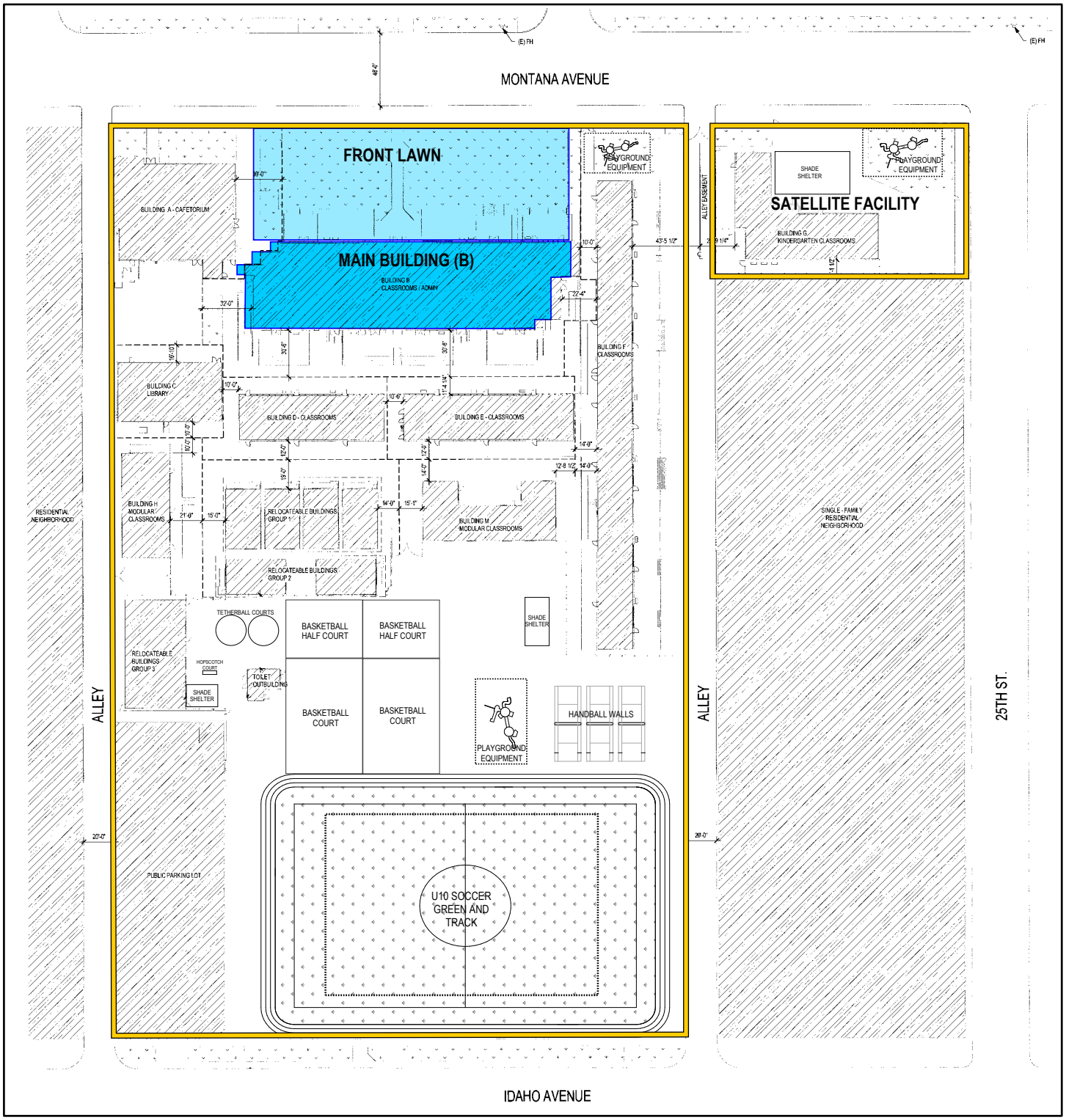

School Boundary

Main Building (B) - Historical Designation

Front Lawn - Historical Designation

Michael Baker INTERNATIONAL

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Existing Campus

Figure 3-4

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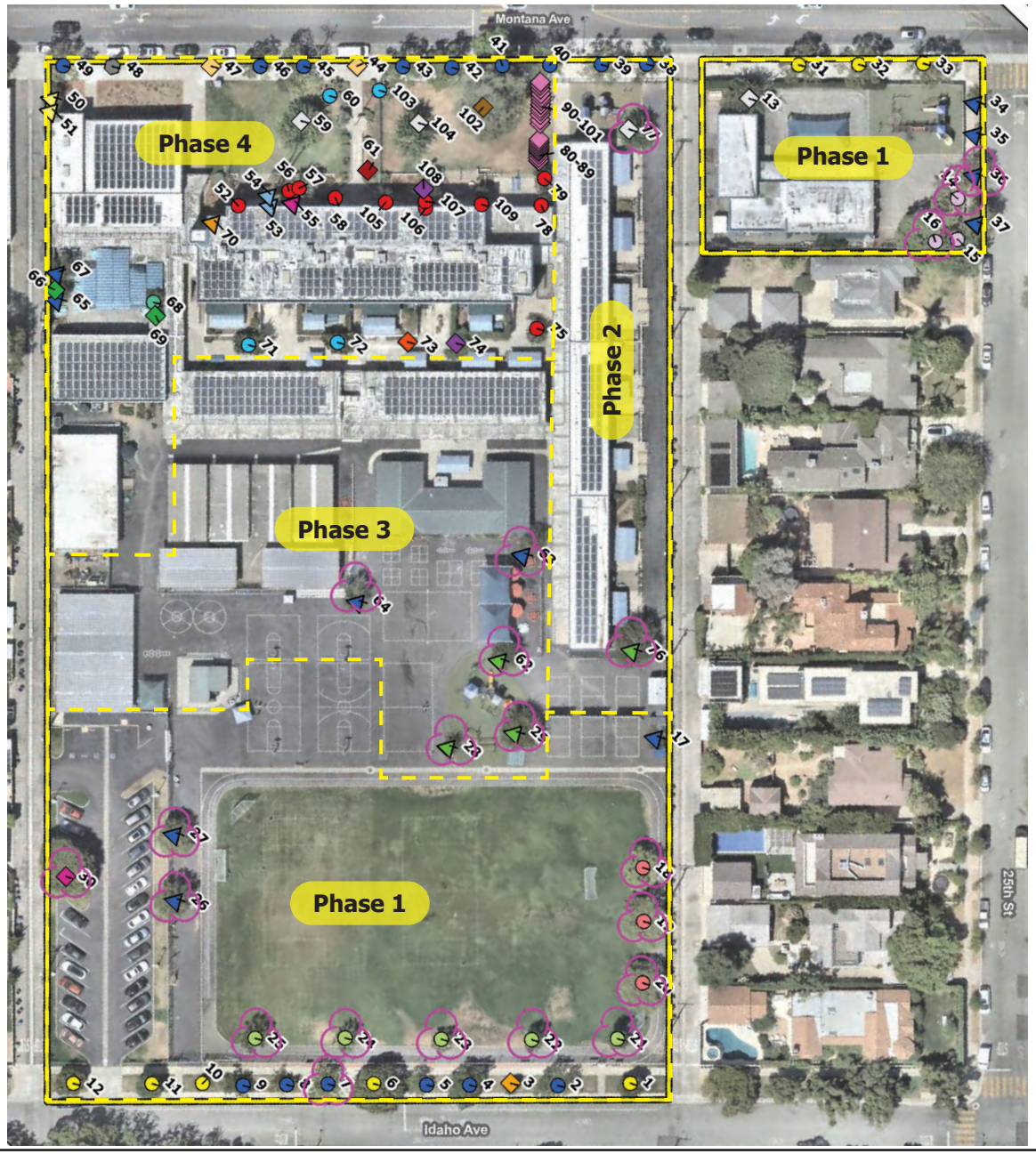

Project Boundary

Tree Species

- strawberry tree *(Arbutus unedo)*
- bottle tree *(Brachychiton populneus)*
- deodar cedar *(Cedrus deodara)*
- western redbud *(Cercis occidentalis)*
- camphor tree *(Cinnamomum camphora)*
- Indian laurel fig *(Ficus microcarpa)*
- rusty-leaf fig *(Ficus rubiginosa)*
- Australian willow *(Geijera parviflora)*
- octopus tree *(Heptapleurum actinophyllum)*
- toyon *(Heteromeles arbutifolia)*
- holly *(Ilex sp.)*
- jacaranda *(Jacaranda mimosifolia)*
- Chinese juniper *(Juniperus chinensis)*
- Japanese privet *(Ligustrum japonicum)*
- rotundiloba sweetgum *(Liquidambar styraciflua 'Rotundiloba')*
- white mulberry *(Morus alba)*
- avocado *(Persea americana)*
- London plane tree *(Platanus x hispanica)*
- Travelers palm *(Ravenala madagascariensis)*
- Brazilian pepper tree *(Schinus terebinthfolia)*
- tipu tree *(Tipuana tipu)*
- Chinese elm *(Ulmus parvifolia)*
- unknown *(Unknown sp.)*
- Mexican fan palm *(Washingtonia robusta)*
- giant yucca *(Yucca gigantea)*

Proposed Tree Removal

Phase Limits

Michael Baker INTERNATIONAL

File: 187261Exhibits.indd

Not to Scale

Source: Psomas, January 2025

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Tree Protection Plan

Figure 3-5

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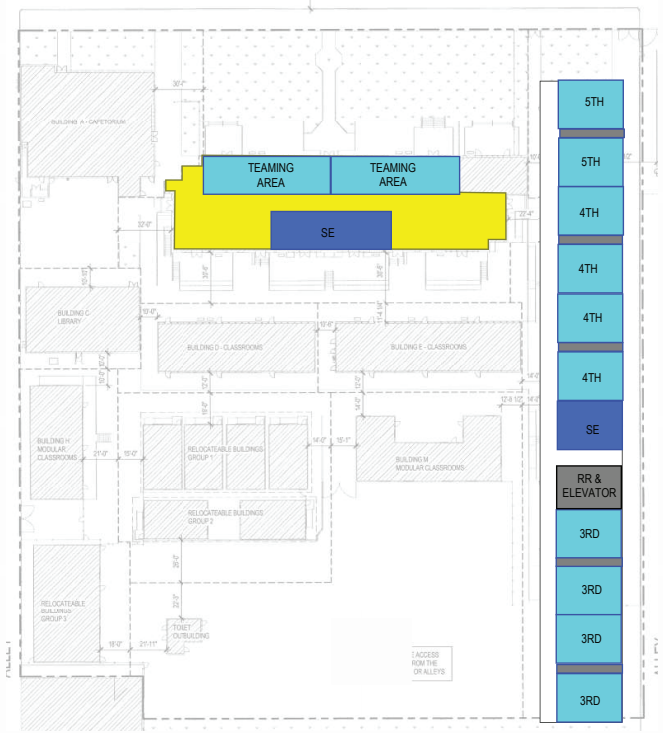
1st Floor



2nd Floor

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Proposed Campus Plan Project (at Buildout)

Figure 3-6A

Michael Baker INTERNATIONAL

File: 187261Exhibits.indd

Not to Scale

Source: Santa Monica-Malibu Unified School District, dsk architects, 2024.

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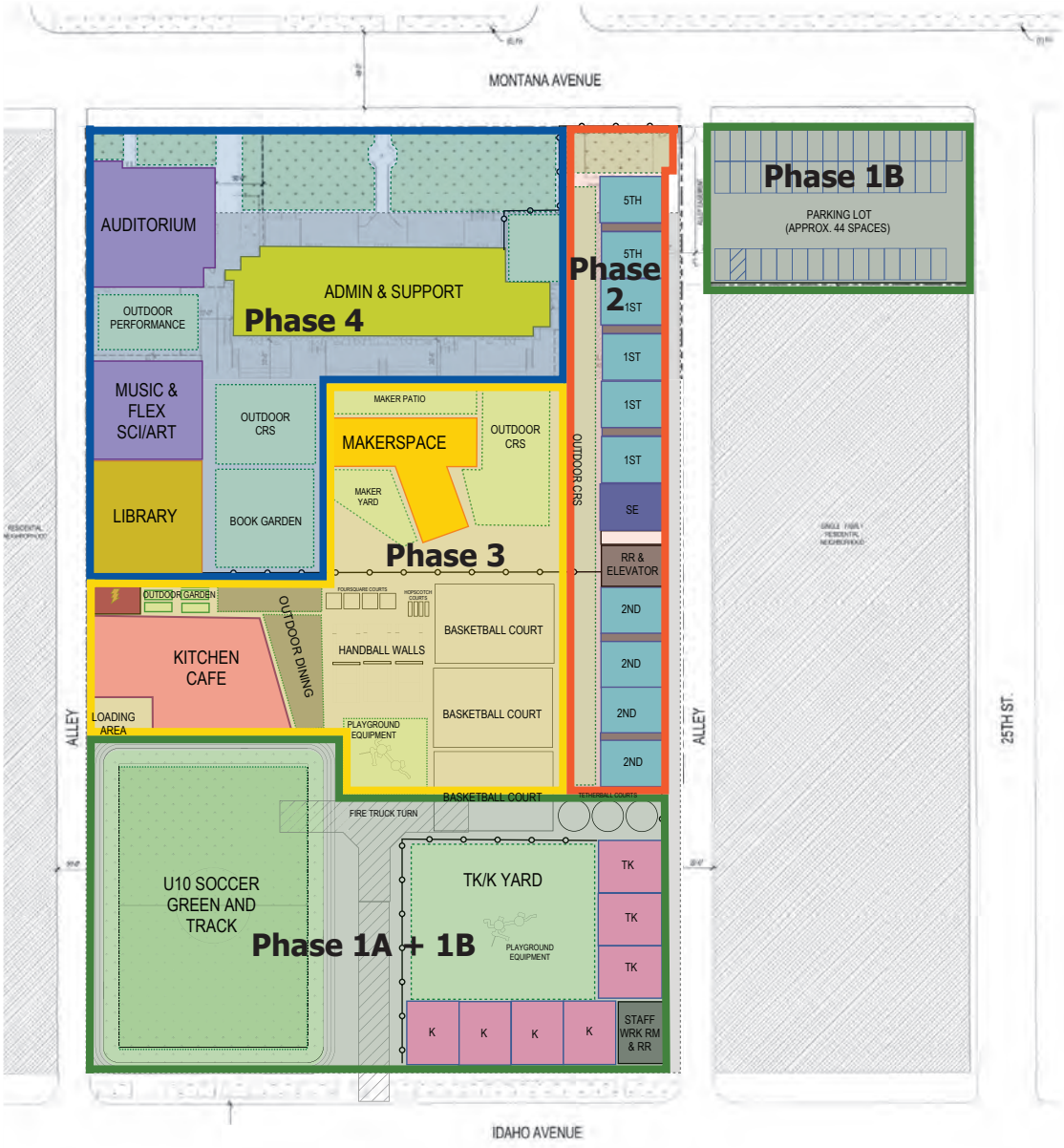
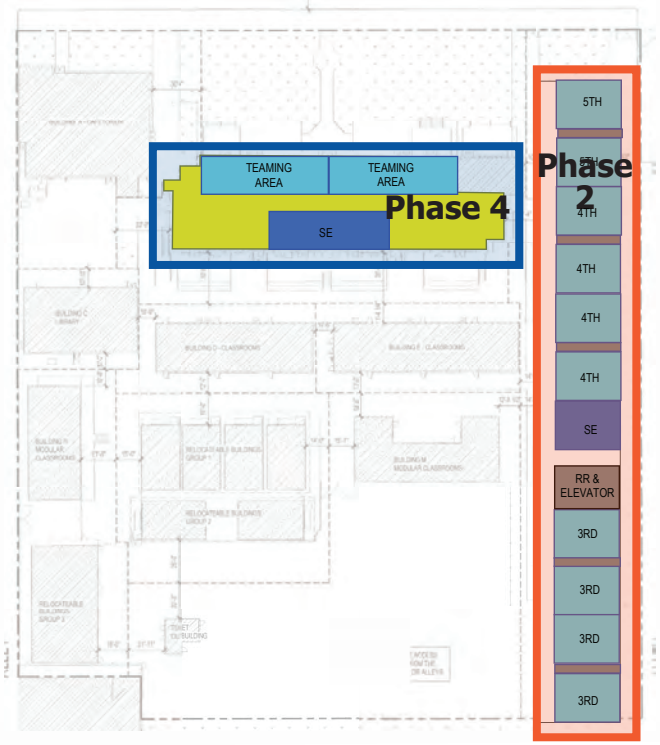


1st Floor



2nd Floor

Phase 1A + 1B
Phase 2
Phase 3
Phase 4

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Proposed Improvement Phases

Figure 3-6B

Michael Baker INTERNATIONAL

File: 187261Exhibits.indd

Not to Scale

Source: Santa Monica-Malibu Unified School District, dsk architects, 2024.

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4. ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
AESTHETICS. Except as provided in Public Resources Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Overview

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

The City of Santa Monica General Plan does not contain an element that specifically addresses aesthetics or visual quality. The adopted Land Use and Circulation Element includes policies relative to development of the visual and architectural quality of the City. As the elementary school campus is a District-owned property (rather than state-owned), construction and operation of the Proposed Project is subject to consideration of the policies outlined in the City's General Plan as well as Article 9, Planning and Zoning, of the Santa Monica Municipal Code (SMMC). However, it is anticipated that the District School Board would pass a Resolution to exempt the Franklin Elementary School Campus Plan from City of Santa Monica General Plan and zoning ordinance provision.

Discussion of Impacts

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

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

Within the City of Santa Monica and its vicinity, scenic resources include the Pacific Ocean, Santa Monica State Beach, the bluffs overlooking the beach, Santa Monica Pier, and the Santa Monica Mountains. Additionally, the City's General Plan Land Use and Circulation Element identifies policies aimed at preservation of public view corridors, which include views of the ocean from east–west trending streets; public ocean views and the Santa Monica Pier from Palisades Park; and public views of Santa Monica from the pier. In addition, public views of such resources experienced from the Proposed Project's vicinity are not officially designated as protected or scenic vistas.

As stated earlier, the site is located approximately 1.7 miles northeast of Santa Monica State Beach and the Pacific Coast Highway. Views of the subject site are not afforded from these locations due to distance, as well as intervening development and topography. The Santa Monica Mountains lie approximately 1.8 miles or more to the northwest. Due to distance, the site is not discernable in the City of Santa Monica when viewed from vantage points along these mountains. Further, due to the location of the campus in the City, the proposed improvements would not obstruct panoramic views of visually prominent or valued resources from any scenic viewpoints in proximity to the site.

Therefore, the Proposed Project would not obstruct an existing valued view or degrade a scenic vista. No impact would occur in this regard.

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

No Impact. The only officially state-designated scenic highway in Los Angeles County is State Route 2 (Angeles Crest Highway) as it extends through the Angeles National Forest (Caltrans n.d.). The nearest portion of this scenic highway to the Proposed Project's site is located approximately 35 miles to the east/southeast. State Route 1 runs along the Pacific Ocean coastline approximately 1.8 miles southwest of the Proposed Project's site at its closest point and is eligible for scenic highway status; however, it has not been formally designated as such (Caltrans n.d.). Due to the distance from these roadways, existing topography, and intervening development, the Proposed Project would not damage scenic resources within a state scenic highway.

Based on the findings of the Historical Resources Inventory Report (ARG 2022a; see Appendix B-1), the original campus building (Main Building), which has served as the historical anchor of the Franklin campus, was determined to be individually eligible for listing in the California Register of Historical Resources under Criteria 1 and 3, and for local (City of Santa Monica) listing under Criteria 1, 4, and 5. The evaluation and eligibility determination included the lawn at the front (north) of the site. Refer to Section 4.5, Cultural Resources, for additional discussion. No other buildings or improvements on the Franklin Elementary School campus were identified as potential historical resources.

There is one potential historical resource adjacent to the Proposed Project's site, which is the Montana Avenue Multi-Family Residential Historic District, identified as a potentially eligible historic district in the City of Santa Monica's Historical Resources Inventory. However, it was determined that the Proposed Project would not compromise the significance or integrity of the

potential Montana Avenue Multi-Family Residential Historic District. The Proposed Project's site is currently a noncontributor to that potential historic district and would remain as such upon the Proposed Project's completion (ARG 2022b; ARG 2025).

The proposed improvements would result in limited visual changes of the façade of the original Main Building; however, the Proposed Project has been designed to minimize such alterations so as to maintain the visual character and integrity of the original building. The Main Building, including its associated landscaping, would be retained during all phases of the Proposed Project. The Proposed Project would result in some alterations of the Main Building during Phase 4, which would involve interior renovations of the building and removal of a one-story projecting volume at its northeast corner. This volume is a later addition to the building and is not associated with its historic design. Additionally, interior spaces within the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. The alterations proposed as part of Phase 4 would not materially impair those physical characteristics that convey the significance of the resource, as those are confined to exterior spaces. Therefore, the Main Building would maintain integrity of setting following the Proposed Project's implementation and would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark (ARG 2025). As indicated in Section 4.5, Cultural Resources, potential impacts to designated historical resources have been avoided through the Proposed Project's design, and therefore, a significant impact would not result with the Proposed Project's implementation. Refer to Section 4.5, Cultural Resources, for a more detailed discussion.

The Proposed Project site is currently developed and supports the existing school facilities. No rock outcroppings are present on-site or nearby.

Overall, the Proposed Project would require some removal of existing trees both on campus and within the public right-of-way (off-site). To accommodate full buildout of the Proposed Project, it is estimated that a total of 20 on-site trees and 2 off-site trees (all ornamental and nonnative) would be removed; however, tree removal for Phases 2 to 4 would ultimately be confirmed as development of the campus occurs over time. The proposed improvements planned for Phase 1 would require removal of 11 existing trees relative to the main school campus and 3 existing trees relative to the satellite campus. For the main campus, one street tree (bottle tree, *Brachychiton populneus*) within the public right-of-way would be removed along Idaho Avenue. The other 10 trees to be removed are located within the site interior and include three tipu trees (*Tipuana tipu*), two Australian willow (*Geijera parviflora*), and five rotundiloba sweetgum (*Liquidambar styraciflua* 'Rotundiloba'). For the satellite campus, one street tree (Australian willow, *Geijera parviflora*) would be removed along 25th Street. The two other trees to be removed are located within the site interior and are jacaranda (*Jacaranda mimosifolia*). Refer to **Figure 3-5, Tree Protection Plan**.

The District would provide monetary payment to the City of Santa Monica for removal of the two street trees within the public right-of-way, rather than plant replacement trees. All trees to be removed with the Proposed Project are ornamental and non-native and are part of the existing on-site landscaping. As all such trees are non-native, ornamental species, they do not represent

sensitive biological resources; None of the trees to be removed have been identified as having historic significance or scenic value. Additionally, at ultimate buildout of the Campus Plan, the number of newly planted trees would exceed the number of trees removed to allow for the planned improvements; however, at this time, the exact number of replacement trees is unknown.

No state-designated scenic highways traverse the Proposed Project site or vicinity. Further, the proposed improvements and upgrades would result in similar educational and recreational facilities on-site that would not substantially differ in character from those currently found on the subject property. For the reasons above, the Proposed Project would not substantially damage any scenic resources. No impact would occur.

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

Less than Significant Impact. Refer also to the discussion under Impacts 4.1-a and 4.1-b, above. The Proposed Project's site is located within the City of Santa Monica, which is highly urbanized. Therefore, evaluation as to whether the Proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings is not required. Visual simulations were prepared for the public's information only; however, they are not intended to support an analysis of any potential environmental impacts in this regard relative to CEQA requirements. Although architectural design for the proposed improvements has not yet been finalized, the images depicted in **Figures 4.1-1** and **4.1-2** are intended to represent the anticipated visual character of the overall improvements. It should be noted that the overhead utility lines shown in **Figure 4.1-2B** are not proposed with the Proposed Project's improvements and are part of the existing setting; however, they are simulated in the view provided.

Figure 4.1-1A, Visual Simulation 1: View Looking Southwest from Montana Avenue (Existing View), shows the existing view from the vicinity of Montana Avenue and 24th Place, looking southwest to the site. As shown, the view from this public vantage point is largely composed of the existing classroom building (adjacent to the alleyway) and playground in the foreground, with the main administration/support building and front lawn in the middleground. Although largely screened by the existing trees along the Proposed Project's frontage, portions of the Cafetorium are visible in the background.

Figure 4.1-1B, Visual Simulation 1: View Looking Southwest from Montana Avenue (Proposed View), shows the proposed view from the vicinity of Montana Avenue and 24th Place, looking southwest to the site, following the Proposed Project's implementation. As illustrated, views of the proposed improvements would include perimeter landscaping along Montana Avenue associated with the satellite campus parking lot, the two-story classroom building, main administration/support building, and front lawn.

As illustrated, the proposed on-site improvements would be visible to travelers along Montana Avenue, similar to that which occurs under existing conditions. The proposed two-story classroom

building would be visible in the foreground, with the main administration/support building (two stories to remain) in the middleground, and the proposed auditorium in the background.

The two-story classroom building would represent a visual element of increased bulk and scale within the landscape; however, the building would be located adjacent to the two-story Main Building which would remain and would therefore generally reflect the height and scale of existing on-site structures from this vantage point, providing a stepped transition in heights that are complementary to each other. The new construction and improvements to the Main Building have been designed to reflect the visual character and appearance of existing on-site buildings relative to materials and color, as well as to respect and maintain the architectural design of the campus. Further, landscaping improvements are proposed within the front lawn and along the campus frontage, in combination with existing on-site trees and other vegetation, which would enhance the visual appearance of the site and provide potential screening of views from intermittent vantage points along Montana Avenue. As such, the Proposed Project is not anticipated to substantially change the overall character of the site or adversely alter existing public views from Montana Avenue or other adjacent public roadways in the vicinity.

Figure 4.1-2A, Visual Simulation 2: View Looking Northwest from Idaho Avenue (Existing View), shows the existing view looking northwest to the site from Idaho Avenue near the alleyway located just to the east of the playfield. As shown, views from this vantage point are mainly of the playfield and playground in the foreground and middleground, with views of the existing classroom buildings comprising the background.

Figure 4.1-2B, Visual Simulation 2: View Looking Northwest from Idaho Avenue (Proposed View), shows the proposed view looking northwest to the site from Idaho Avenue near the 24th Place alleyway located just to the east of the playfield. As shown, the new TK/K building and associated circulation (stairs, access ramp) would be visible from this vantage point. In the background, the new two-story classroom building would be visible, extending northward along the alleyway towards Montana Avenue. Fencing associated with the classroom building would be seen adjacent to the alleyway, generally running the length of the building.

As illustrated, views from this vantage point of the existing playfield and adjacent playground equipment would be replaced with the TK/K facilities, largely blocking views into the property and screening development located within the interior of the campus. As located, the TK/K classroom building would represent an element of increased visual scale and bulk within the landscape as compared to the relatively level, "undeveloped" character of the existing playfield. However, the TK/K facilities would be constructed as a one story building with a simple façade and would reflect the general character and scale of surrounding single-family residences to the east and south within the neighborhood. As such, the structure would not represent a dominant element within the landscape and would visually blend into the existing setting.

Additionally, the new two-story classroom building would be distanced from this vantage point, thereby decreasing its visual scale and visibility within the landscape and its potential to substantially alter existing views of the site. Portions of the existing 11-foot high chain-link fence along the eastern property boundary (24th Place) of the school campus would be removed or

replaced as shown in **Figure 4.1-2B** for security purposes. Proposed landscaping (e.g., trees) along the Idaho Avenue frontage would help to intermittently screen public views into the site from the roadway. Additionally, just west of the TK/K facilities, the new playfield would be also visible and would distance other proposed development on the campus from the road, providing open space that would decrease the visibility of the proposed on-site structures from Idaho Avenue within the visual landscape.

Overall, construction of the two-story classroom building and the TK/K building would alter existing (private) views from the rear yards of residences east of the school campus that currently back-up to the 24th Place alleyway; refer to **Figure 3-6A, Proposed Campus Plan Project (at Buildout)** and **Figures 4.1-1** and **4.1-2**. Although, upon adoption, the Proposed Project would not be subject to the design regulations (setbacks, maximum building height, etc.) set forth in the City's zoning ordinance, the Campus Plan has been designed to generally respect the side yard setback requirements as identified in the City's Zoning Ordinance for the site, thereby distancing the proposed buildings from the alleyway (and the residential uses) to the extent feasible to reduce the sense of scale.

Further, although the proposed two-story classroom building may be of greater bulk and scale than the existing classrooms in that portion of the campus, development as proposed would not obstruct any designated views considered to be of scenic value. The new classroom building would be constructed to meet the maximum roof line height limit of the City's zoning code, with allowable exceptions made for roof mounted equipment. Maximum allowable building height in the PL zone is two stories (32 feet); however, Section 9.21.060, Height Projections, identifies exceptions to height projections for building-mounted mechanical equipment and allows vertical projections to exceed the maximum allowable building height limit by 12 feet.

The Proposed Project has been designed to best abide by such design standards while still meeting the District's adopted Educational Specifications aimed at providing adequate facilities for its students. SMMUSD goals generally align with the City's intentions for new development (e.g., compatibility with surrounding land uses, context-sensitive design, maintaining visual and architectural quality, building articulation, pedestrian safety). All new construction would be designed and implemented in conformance with the adopted Franklin Elementary School Campus Plan, the Districtwide Plan for Sustainability, and other design and construction standards required for schools by the California Division of the State Architect.

To minimize the potential for change to existing public views of the site from surrounding public roadways, Project Design Feature (PDF) PDF-AES-1 is proposed to be implemented during the construction phase. PDF-AES-1 would require installation of temporary fencing along the perimeter of on-site areas where active construction is underway to screen views of such activity from off-site public roadways (at street level). Further, as construction would be short term in nature, any such disruption to or change in existing public views to the site (construction equipment, staging areas, ground disturbance, etc.) would be temporary and would cease when construction within a specific area of the site is completed.

For the reasons above, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant.

Project Design Feature:

PDF-AES-1 **Temporary Construction Fencing.** Prior to commencement of any on-site grading or construction activity, the contractor will install temporary fencing along the periphery of each active phase area of construction to screen construction activities from view at the street level. The temporary fencing will be removed in its entirety upon completion of construction activity within each active phase.

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

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

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

Construction

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

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

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible areas where the reflection of sunlight could occur. However, any glare would be short term given the movement of construction equipment and materials within a given construction area and the temporary nature of construction activities. Therefore, light and glare associated with the Proposed Project's construction would not adversely impact daytime or nighttime views in the area. Further, it is anticipated that the temporary fencing/screening (green mesh screening material incorporated) to be installed along the perimeter of on-site areas where active construction is underway (PDF-AES-1) would reduce potential glare effects on off-site receptors. Accordingly, there would be a negligible potential for daytime glare to occur during construction.

Operation

The Proposed Project is a partial redevelopment of the existing school campus. While new exterior night lighting would be installed with the proposed facility improvements, the amount of lighting would remain essentially the same for the overall campus. Consistent with SMMUSD practice, new lighting would utilize light-emitting diode (LED) bulbs and would be appropriately shielded and aimed downward, to reduce potential light spill, glare, and skyglow. New lighting would be limited to that necessary for safety and security, circulation, and facility identification purposes and would be consistent with the site's existing lighting levels. As such, the Proposed Project's operation would result in a significant impact with regard to nighttime lighting.

The new surface parking lot proposed on the satellite campus would have nighttime lighting to ensure public safety and safe circulation. Light poles installed would be a maximum of 20 feet in height. Lighting fixtures would be controllable LED lights, projected downward and shielded to prohibit spillover onto adjacent properties. All such lighting would be in compliance with SMMC Section 9.21.080, Lighting, which restricts lighting levels to a minimum of 0.5 foot-candles and a maximum of 3.0 foot-candles over the parking lot surface. Additionally, all Proposed Project lighting would comply with the City requirement that direct rays from lighting fall entirely within the boundary of the proposed parking lot. Therefore, the Proposed Project would not generate a new source of substantial nighttime lighting that would have the potential to adversely affect nighttime views in the area.

Use of the on-site playfield and recreational amenities would occur during daytime hours, similar to existing conditions, and as such, the playfield and hardscape play areas would remain unlit. Lighting would only be implemented as required by the Division of the State Architect for means of egress to areas of safe dispersal and accessibility requirements. Additionally, the Proposed Project would not result in a change to operational hours of the school or its associated

recreational facilities, and the school would continue to operate during normal daytime hours with exception of periodic evening events, as occurs under current conditions.

Additionally, the Proposed Project does not include construction or installation of structures using highly reflective materials or surfaces that could create a new source of substantial glare adversely affecting daytime views in the area. As shown in **Figures 4.1-1** and **4.1-2**, the improvements proposed would reflect the architectural style of the existing on-site structures (constructed of stucco, brick, etc.). Any metal surfaces integrated into the proposed building facades would be surfaced with non-reflective paint or otherwise treated (i.e., galvanized) to minimize or reduce the potential for glare to occur. The use of highly reflective building materials or large expanses of glass is not proposed and would therefore not represent a new potential source of substantial glare.

For the reasons above, the Proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts resulting from light and glare would be less than significant.

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SANTA MONICA, CA

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Visual Simulation 1: View Looking Southwest from Montana Avenue (Existing View)

Figure 4.1-1A

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SANTA MONICA, CA

Michael Baker
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Visual Simulation 1: View Looking Southwest from Montana Avenue (Proposed View)

Figure 4.1-1B

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Visual Simulation 2: View Looking Northwest from Idaho Avenue (Existing View)

Figure 4.1-2A

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Visual Simulation 2: View Looking Northwest from Idaho Avenue (Proposed View)

Figure 4.1-2B

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4.2 AGRICULTURE AND FORESTRY RESOURCES

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

Overview

The California Department of Conservation (CDOC) manages the Farmland Mapping and Monitoring Program, which identifies and maps significant farmland. Farmland is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance is based on the suitability of soils for agricultural production, as determined by a soil survey conducted by the Natural Resources Conservation Service. The CDOC manages an interactive website, the California Important Farmland Finder. Specifically, the Proposed Project's site is identified as Urban and Built-Up Land (CDOC 2024a), which is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, and is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, and other developed purposes (CDOC 2024b). Therefore, the Project site is not considered to be agriculturally important land.

Discussion of Impacts

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

No Impact. The CDOC maps the Proposed Project site and surrounding region as Urban and Built-Up Land (CDOC 2024a). This designation is consistent with the Proposed Project area, as the property is fully developed with existing educational uses and no farmland exists within the area. Therefore, the Proposed Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact would occur.

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

No Impact. The Proposed Project would be located on a developed educational campus site. The site is not subject to a Williamson Act contract, and is zoned Institutional/Public Lands (PL) and R2 (Multi-Unit Low-Density Residential) by the City of Santa Monica. These zoning designations are not intended for agricultural uses. Therefore, implementation of the Proposed Project would have no impact on zoning for agricultural use or a Williamson Act contract. No impact would occur.

4.2-c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

***No Impact*.** The Proposed Project site contains no forest or timber resources, is not zoned for forestland protection or timber production, and would have no impact on any lands with such zoning. Thus, no impact would occur.

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

***No Impact*.** The Proposed Project site contains no forest or timber resources. Thus, no impact would occur.

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

***No Impact*.** No features of the Proposed Project would necessitate or result in the conversion of off-site farmland. The entirety of the Proposed Project would occur on the existing campus of the Franklin Elementary School. The Proposed Project's site is not located adjacent to or within the vicinity of any farmland. Thus, no impact would occur.

4.3 AIR QUALITY

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

Overview

The campus is in the South Coast Air Basin (Basin, SCAB). The SCAB is one of several regional air basins designated by the state for air quality management and air pollution control in California. The SCAB area consists of a 6,600-square-mile coastal plain bounded by the Pacific Ocean to the southwest and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County.

The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the urban portions of Los Angeles, Riverside, and San Bernardino counties, and all of Orange County. The agency's primary responsibility is ensuring that the federal and state ambient air quality standards are attained and maintained in the Basin. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, inspecting and issuing permits for stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

Both the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards are levels of contaminants representing safe levels that avoid specific adverse health effects associated with each pollutant. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The six criteria pollutants are ozone (O_3), carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO_2), and lead. 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. The Los Angeles County portion of the SCAB is designated as a nonattainment area for ozone, coarse particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) for state standards and ozone, lead, and $PM_{2.5}$ for federal standards.

Regulatory Setting

South Coast Air Quality Management District

The SCAQMD is one of 35 air quality management districts that have prepared AQMPs to accomplish a five-percent annual reduction in emissions. SCAQMD adopted the 2022 AQMP on December 2, 2022. The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 eight-hour ozone NAAQS-70 parts per billion (ppb) as expeditiously as practicable, but no later than the statutory attainment deadline of August 3, 2038, for the Basin and August 3, 2033, for the Riverside County portion of the Salton Sea Air Basin. The 2022 AQMP incorporates the Southern California Association of Governments (SCAG)'s *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS) and motor vehicle emissions from CARB. SCAG updates the RTP/SCS every four years and the most recent plan, the 2024-2050 RTP/SCS (Connect SoCal 2024) was adopted by SCAG on April 4, 2024. However, CARB's review of Connect SoCal 2024 is still underway and, until CARB makes the decision, Connect SoCal 2024 is not a fully adopted document and is potentially subject to further updates. In addition, SCAQMD has not adopted an updated AQMP to incorporate the Connect SoCal 2024.

In addition to the 2022 AQMP and its rules and regulations, the SCAQMD published the CEQA Air Quality Handbook (SCAQMD 1993). The SCAQMD CEQA Air Quality Handbook provides guidance to assist local government agencies and consultants in developing the environmental documents required by CEQA. With the help of the CEQA Air Quality Handbook, local land use planners and other consultants can analyze and document how proposed and existing projects affect air quality and should be able to fulfill the requirements of the CEQA review process. The SCAQMD is in the process of developing an Air Quality Analysis Guidance Handbook to replace the current CEQA Air Quality Handbook approved by the SCAQMD Governing Board in 1993.

Southern California Association of Governments

SCAG is the regional planning agency that implements the RTP/SCS for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and State air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. The 2020-2045 RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the 2022 AQMP. The SCAQMD combines its portion of the AQMP with measures prepared by SCAG (SCAQMD 2022). The Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020-2045 RTP/SCS. As noted above, the latest Connect SoCal 2024 was adopted by SCAG on April 4, 2024. However, CARB's review of Connect SoCal 2024 is still underway and, until CARB makes the decision, Connect SoCal 2024 is not a fully adopted document and is potentially subject to further updates. In addition, the SCAQMD has not released an updated AQMP incorporating Connect SoCal 2024. As such,

the consistency analysis is based off the 2022 AQMP and the RTP/SCS that was adopted at the time, the 2020-2045 RTP/SCS.

Air Quality Significance Thresholds

SCAQMD provides guidance to lead agencies on how to evaluate project air quality impacts related to the following criteria: (1) cause or contribute to any new violation of any air quality standard; (2) increase the frequency or severity of any existing violation of any air quality standard; or (3) delay timely attainment of any air quality standard or any required interim emission reductions or other milestones of any Federal attainment plan.

The SCAQMD's *South Coast AQMD Air Quality Significance Thresholds* provides significance thresholds for both construction and operation of projects within the SCAQMD jurisdictional boundaries. If a project generates emissions in excess of the established mass daily emissions thresholds, as outlined in **Table 4.3-1**, **South Coast Air Quality Management District Mass Daily Emissions Thresholds**, a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of impacts. In addition, SCAQMD establishes odor thresholds, which indicate that projects creating an odor nuisance pursuant to SCAQMD Rule 402 would cause a significant impact.

TABLE 4.3-1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT MASS DAILY EMISSIONS THRESHOLDS

Phase	Pollutant (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Construction	75	100	550	150	150	55
Operational	55	55	550	150	150	55

Source: South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, Revised March 2023.
Notes: ROG = reactive organic gases; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter up to 10 microns; $PM_{2.5}$ = particulate matter up to 2.5 microns; lbs = pounds

Localized Significance Thresholds

Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated July 2008) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with the Proposed Project's specific air emissions. The SCAQMD provides the LST lookup tables for one-, two-, and five-acre projects emitting CO, NO_X, PM_{10}, or $PM_{2.5}$. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways.

Cumulative Emissions Thresholds

Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed in the SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution:

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… projects that exceed the project-specific significance thresholds are considered by the SCAQMD to*

be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Discussion of Impacts

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

***Less than Significant Impact*.** The Proposed Project is located within the SCAB, which is governed by the SCAQMD. On December 2, 2022, the SCAQMD Governing Board adopted the 2022 AQMP. The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, updated emission inventory methodologies for various source categories. According to the SCAQMD's CEQA Air Quality Handbook, projects must be analyzed for consistency with two main criteria, as discussed below:

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.

i. 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, an analysis of the Proposed Project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating the Proposed Project's consistency. As discussed in Response 4.3-c (below), localized concentrations of CO, NO_X, PM_{10}, and $PM_{2.5}$ would be less than significant during the Proposed Project's construction and operations. Therefore, the Proposed Project would not result in an increase in the frequency or severity of existing air quality violations. Due to the role VOC plays in O_3 formation, it is classified as a precursor pollutant for which only a regional emissions threshold has been established. As such, the Proposed Project would not cause or contribute to localized air quality violations or delay the attainment of an air quality standard or interim emissions reductions specified in the 2022 AQMP.

ii. Would the project cause or contribute to new air quality violations?

As discussed below in Response 4.3-b and Response 4.3-c, the Proposed Project would result in emissions below the SCAQMD thresholds. Therefore, the Proposed Project would not have the potential to cause or contribute to a violation of the ambient air quality standards.

iii. Would the project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

As shown in Response 4.3-c, the Proposed Project would result in less than significant impacts with regard to localized concentrations during the Proposed Project's construction and operations. As such, the Proposed Project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

Criterion 2:

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning with the Basin 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 consistency analysis for the second criterion focuses on whether the project exceeds the assumptions utilized in preparing the forecasts presented in the 2022 AQMP. Determining whether a project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of the following criteria.

i. Would the project be consistent with the population, housing, and employment growth projections utilized in the preparation of the AQMP?

A project is consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the City's General Plan, SCAG's regional growth forecast, and SCAG's 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS also provides socioeconomic forecast projections of regional population growth.

Development consistent with the growth projections in the General Plan is considered to be consistent with the AQMP. The Proposed Project is consistent with the land use designation and development density presented in the General Plan; refer to Section 4.11, Land Use and Planning. Further, the Proposed Project would not result in an increase in population growth in the City, nor would student attendance increase due to the proposed renovation of campus facilities; refer to Section 4.14, Population and Housing. The Proposed Project is therefore consistent with this AQMP consistency criterion and would not result in significant impacts in this regard.

The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the City. 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 2022 AQMP.

ii. Would the project implement all feasible air quality mitigation measures?

The Proposed Project would result in less than significant air quality impacts and would comply with all applicable SCAQMD rules and regulations, including Rule 403, which requires excessive fugitive dust emissions controlled by regular watering or other dust prevention measures, and Rule 1113, which regulates the ROG content of paint. As such, the Proposed Project meets this AQMP consistency criterion.

iii. 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 campus is designated Institutional/Public Lands (main school campus) and Low-Density Housing (adjacent satellite facility), which is intended for institutional uses compatible

with a location in closer proximity to residential development that do not generate substantial volumes of heavy truck traffic. As discussed in Section 4.8, Greenhouse Gases, the Proposed Project would promote redevelopment of underperforming outmoded nonresidential uses and implement various SCAG policies. Further, the Proposed Project would be consistent with the goals of Senate Bill 375. The Proposed Project would also not result in an increase in population growth in the City, nor would student attendance increase due to the proposed renovation of campus facilities. 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 2022 AQMP. As such, the Proposed Project meets this AQMP consistency criterion.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Proposed Project on air quality in the SCAB. The Proposed Project would not result in a long-term impact on the region's ability to meet state and federal air quality standards. As discussed above, the Proposed Project's long-term influence would also be consistent with the goals and policies of the AQMP and is consistent with the SCAQMD's 2022 AQMP. Therefore, the Proposed Project would result in a less than significant impact related to this threshold.

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

Less than Significant Impact. The Proposed Project has the potential to generate short-term emissions during construction and long-term emissions during operations. Construction activities may generate temporary pollutant emissions through the use of heavy-duty construction equipment (e.g., graders, pavers), as well as through construction worker, vendor, and haul trips. The Proposed Project's operations may generate area, energy, mobile, or stationary source emissions. The following analysis discusses the Proposed Project's generated construction, operational, and cumulative emissions.

CRITERIA POLLUTANTS

The following discusses the specific criteria pollutants of concern considered as part of this analysis.

Carbon Monoxide (CO). CO is an odorless, colorless toxic gas that is emitted by mobile and stationary sources as a result of incomplete combustion of hydrocarbons or other carbon-based fuels. In cities, automobile exhaust can cause as much as 95 percent of all CO emissions. CO replaces oxygen in the body's red blood cells. Individuals with a deficient blood supply to the heart, patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes are most susceptible to the adverse effects of CO exposure. People with heart disease are also more susceptible to developing chest pains when exposed to low levels of CO.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (the "good" O_3 layer) extends

upward from about 10 to 30 miles and protects life on Earth from the sun's harmful ultraviolet rays.

While O_3 in the upper atmosphere (stratosphere) protects the Earth from harmful ultraviolet radiation, high concentrations of ground-level O_3 (in the troposphere) can adversely affect the human respiratory system and other tissues. This "bad" O_3 is a photochemical pollutant and is a strong irritant that can constrict the airways, forcing the respiratory system to work hard to deliver oxygen. Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible to the health effects of O_3. Short-term exposure (lasting for a few hours) to O_3 at elevated levels can result in aggravated respiratory diseases (such as emphysema, bronchitis, and asthma), shortness of breath, increased susceptibility to infections, inflammation of the lung tissue, and increased fatigue, as well as chest pain, dry throat, headache, and nausea.

O_3 needs VOCs, NO_X, and sunlight to form; therefore, VOCs and NO_X are O_3 precursors. To reduce O_3 concentrations, it is necessary to control the emissions of these O_3 precursors. Significant O_3 formation generally requires an adequate concentration of precursors in the atmosphere and a period of several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

Nitrogen Dioxide (NO_2). NO_X are a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (which is the primary pollutant indicated in NO_X) is a reddish-brown gas that can cause breathing difficulties at elevated levels. Peak readings of NO_2 occur in areas that have a high concentration of combustion sources (e.g., motor vehicle engines, power plants, refineries, and other industrial operations). NO_2 can irritate and damage the lungs and lower resistance to respiratory infections such as influenza. The health effects of short-term exposure are still unclear. However, continued or frequent exposure to NO_2 concentrations that are typically much higher than those normally found in the ambient air may increase acute respiratory illnesses in children and increase the incidence of chronic bronchitis and lung irritation. Chronic exposure to NO_2 may aggravate eyes and mucus membranes and cause pulmonary dysfunction.

Coarse Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or ten one-millionths of a meter. PM_{10} arises from sources such as road dust, diesel soot, combustion products, construction operations, and dust storms. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate into lungs and can potentially damage the respiratory tract. On June 19, 2003, CARB adopted amendments to the statewide 24-hour particulate matter standards based upon requirements set forth in the Children's Environmental Health Protection Act (Senate Bill 25).

Fine Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (particulate matter 2.5 microns in diameter or less), both state and federal $PM_{2.5}$ standards have been created. Particulate matter impacts primarily affect infants, children, the elderly, and those with preexisting cardiopulmonary disease. In February 2024, the EPA

lowered the federal primary $PM_{2.5}$ annual standard to 9.0 microgram per cubic meter (ug/m^3) from the 12.0 ug/m^3 standard set in 2012. The secondary annual standard remains at 15.0 ug/m^3. States and Tribal Authorities will submit initial recommendations of areas that do not attain this standard (i.e., nonattainment areas) to EPA by February 2025, and EPA will finalize area designations by February 2026.

Sulfur Dioxide (SO_2). SO_2 is a colorless, irritating gas with a rotten egg smell that is primarily formed by the combustion of sulfur-containing fossil fuels. Sulfur dioxide is often used interchangeably with sulfur oxides (SO_X). Exposure of a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics.

Volatile Organic Compounds (VOC) or Reactive Organic Gases (ROG). VOCs are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms), that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form O_3 to the same extent when exposed to photochemical processes. VOCs often have an odor; some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOC is not considered a criteria pollutant; however, it is a precursor to O_3, which is a criteria pollutant. Due to the role VOC plays in O_3 formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. The SCAQMD uses the terms VOC and ROG (see below) interchangeably.

Short-Term Construction Impacts

Short-term air quality impacts are anticipated during grading and construction activities associated with implementation of the Proposed Project. Temporary emissions would result from the following activities:

- Particulate (fugitive dust) emissions from demolition and grading.
- Exhaust emissions from the construction equipment and the motor vehicles of the construction crew.

Construction emissions were calculated using California Emissions Estimator Model version 2022.1 (CalEEMod) based on the construction information compiled for the Proposed Project; refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data. As previously discussed, the Proposed Project would be implemented in four phases (Phases 1A and 1B and Phase 2 through 4). However, the District is proceeding with design and engineering of the first phase of the funded Proposed Project, with subsequent phases occurring at the District's discretion when funding becomes available. Construction of Phase 1A is expected to commence in 2026 and full buildout of the Proposed Project would occur by 2040; however for the purposes of the air quality analysis, construction would be modeled to end in 2034 (Phase 4), whereas the actual time frame may be longer. The estimated construction schedule for each phase is shown in **Table 4.3-2**, and it should be noted that applying a shorter construction time frame than the actual time frame results in a

conservative analysis that would increase the modeled Proposed Project's construction emissions quantities.

Proposed Project construction would be completed in four separate phases. Because the school campus has been fully developed, each construction phase would generally involve demolition of some existing structures, followed by minor grading and foundation work, building construction, and architectural coating as applicable. Emissions for each construction phase have been quantified based upon the phase duration and equipment type.

Each of the four[1] phases were evaluated individually to determine if the SCAQMD thresholds would be exceeded. Results of the construction emission modeling are shown in **Table 4.3-2**. Proposed Project construction-generated increases in emissions would be predominantly associated with construction equipment, earthwork and excavation activities, and emissions from trucks transporting materials to and from the campus. Phase 2 through Phase 4 do not have a scheduled construction dates yet as it is based on the District's discretion on when to commence construction activities. However, based on the District's provided construction schedule forecast, some construction activities may overlap. As such, **Table 4.3-2** displays the combined maximum emissions from overlapping construction activities.

It should be noted that the District would be required to adhere to use of Tier 3 construction equipment for Phase 1 construction, thereby incorporating control technologies to further reduce emissions during all phases of the Proposed Project's construction. However, as a conservative analysis, this feature is not modeled in CalEEMod. Additionally, the Proposed Project would 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. These are standard dust control measures that the SCAQMD requires for all projects and is included in the CalEEMod modeling.

[1] Note that Phases IA and IB were modeled separately in CalEEMod due to the different timing of the demolition, earthwork, and construction activities.

TABLE 4.3-2 DAILY CONSTRUCTION EMISSIONS – MAXIMUM POUNDS PER DAY (PHASES 1-4)

Emissions Source	Pollutant (pounds per day)[b]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Phase 1A[a]						
2026 Emissions	2.50	22.10	25.20	0.05	3.98	2.23
2027 Emissions	3.02	13.50	18.50	0.03	0.72	0.48
Maximum Daily Emissions	**3.02**	**22.10**	**25.20**	**0.05**	**3.98**	**2.23**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 1B						
2028 Emissions	1.98	16.40	22.40	0.03	3.28	1.70
Maximum Daily Emissions	**1.98**	**16.40**	**22.40**	**0.03**	**6.41**	**3.26**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 2[a]						
2027 Emissions	1.48	13.20	16.30	0.03	3.03	1.58
2028 Emissions	0.51	4.52	7.72	0.01	0.36	0.19
2029 Emissions	2.90	8.33	13.90	0.02	0.73	0.37
Maximum Daily Emissions	**2.90**	**13.20**	**16.30**	**0.03**	**3.03**	**1.58**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 3[a]						
2029 Emissions	1.44	12.40	17.10	0.03	2.82	1.52
2030 Emissions	0.45	4.08	7.16	0.01	0.21	0.14
2031 Emissions	1.95	8.61	14.20	0.02	0.59	0.32
Maximum Daily Emissions	**1.95**	**12.40**	**14.20**	**0.03**	**2.82**	**1.52**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 4[a]						
2031 Emissions	1.37	11.50	17.00	0.03	2.93	1.49
2032 Emissions	0.43	3.79	7.13	0.01	0.21	0.13
2033 Emissions	1.95	4.55	7.07	0.01	0.37	0.17
2034 Emissions	1.94	4.51	6.98	0.01	0.37	0.17
Maximum Daily Emissions	**1.94**	**11.50**	**18.5**	**0.03**	**2.93**	**1.49**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Potential Overlap[c]						
2027 Emissions (Phase 1A plus Phase 2)	4.50	26.70	34.80	0.06	3.75	2.06
2028 Emissions (Phase 1B plus Phase 2)	2.49	20.92	30.12	0.04	3.64	1.89
2029 Emissions (Phase 2 plus Phase 3)	4.34	20.73	31.00	0.05	3.55	1.89
2031 Emissions (Phase 3 plus Phase 4)	3.32	20.11	31.20	0.05	3.52	1.81
Maximum Daily Emissions	**4.50**	**26.70**	**34.80**	**0.06**	**6.77**	**3.45**
SCAQMD Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Refer to Appendix A for assumptions used in this analysis. The numbers may be slightly off due to rounding.

a. The Proposed Project would be required to adhere to standard SCAQMD regulations, such as implementing SCAQMD Rule 403, which would further reduce construction emissions. 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 stock piles 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 Proposed 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 and construction is expected to be short-term and would cease upon Proposed 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 is both a local nuisance and a health concern. Of particular 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. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and resuspension 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 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 Proposed Project must include all required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adherence 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 noted in **Table 4.3-2**, total PM_{10} and $PM_{2.5}$ emissions would not exceed SCAQMD thresholds during construction. Thus, construction air quality impacts associated with fugitive dust 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 Proposed Project's site, employee commutes to the Proposed Project's site, emissions produced on-site as equipment is used, and emissions from trucks transporting materials to/from the site. Standard SCAQMD regulations, such as maintaining all construction equipment in proper tune and shutting down equipment when not in use for extended periods of time, would be implemented. As presented in **Table 4.3-2**, construction equipment and worker vehicle exhaust emissions 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, the ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Rule 1113, all architectural coatings for the proposed structures would comply with specifications on painting practices as well as regulation on the ROG content of paint. ROG (VOC) emissions associated with the Proposed Project would be less than significant; refer to **Table 4.3-2**.

Total Daily Construction Emissions

In accordance with the SCAQMD Guidelines, CalEEMod was utilized to model construction emissions for ROG/VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. As indicated in **Table 4.3-2**, criteria pollutant emissions during construction of the Proposed Project would not exceed the SCAQMD significance thresholds. Thus, impacts due to the total construction-related emissions would be less than significant.

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are human health hazards 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 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, serpentinite and ultramafic rocks are not known to occur within the Proposed Project's area (CDOC 2000). As discussed further in Section 4.9, Hazards and Hazardous Materials, of this IS/MND, 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 asbestos containing materials (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

The Proposed Project would not result in additional student enrollment, and therefore would not generate additional trips or associated mobile source emissions. The Proposed Project's operation-generated emissions were quantified based on the net increase of building area, parking spaces, and open space from existing conditions, and would be associated with the area sources including landscape maintenance equipment and architectural coatings (e.g., repainting), and energy sources.

The analysis of daily operational emissions has been prepared using CalEEMod Version 2022.1. **Table 4.3-3** presents the anticipated Proposed Project's related operational emissions at full buildout in 2040. Additionally, emissions from each source are discussed in more detail below. The Proposed Project's related long-term air pollutant emissions would not exceed the SCAQMD's regional significance thresholds. Therefore, impacts to the regional air quality from the Proposed Project's related operational phase emissions would be less than significant.

TABLE 4.3-3 LONG-TERM AIR EMISSIONS

Emissions Source	Pollutant (pounds/day)[1,2]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Summer Emissions						
Area	0.85	0.01	1.27	<0.01	<0.01	<0.01
Energy	0.01	0.17	0.14	<0.01	0.01	0.01
Total Summer Emissions	**0.86**	**0.18**	**1.41**	**<0.01**	**0.01**	**0.01**
SCAQMD Threshold	55	55	550	150	150	55
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Project Winter Emissions						
Area	0.64	-	-	-	-	-
Energy	0.01	0.17	0.14	<0.01	0.01	0.01
Total Winter Emissions	**0.65**	0.17	0.14	<0.01	0.01	0.01
SCAQMD Threshold	55	55	550	150	150	55
Is Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using CalEEMod version 2022.1, as recommended by the SCAQMD.
2. The numbers may be slightly off due to rounding.
Refer to Appendix A, Air Quality/Greenhouse Gas /Energy Data, for assumptions used in this analysis. Data from CalEEMod model titled "Franklin ES Full Buildout Operations Detailed Report" was utilized for this table.

Area Source Emissions

Area source emissions are generated from consumer products, architectural coating, and landscaping. The Proposed Project would be required to comply with SCAQMD Rule 1113. SCAQMD Rule 1113 restricts the VOC content of architectural coatings, reducing ROG emissions. Area source emissions would be generated due to an increased demand for consumer products, landscape equipment usage, and area architectural coating associated with Project development. As seen in **Table 4.3-3**, the Proposed Project's ROG emissions would not exceed SCAQMD

thresholds. As such, a less than significant impact would occur due to the Proposed Project's operational area source emissions.

Energy Source Emissions

Energy source emissions (i.e., generated at the site of the power generation source) would be generated as a result of electricity and natural gas usage associated with the Proposed Project. The primary use of electricity and natural gas by the Proposed Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. It should be noted that the Proposed Project would comply with the most current version of the California Green Building Standards Code and Title 24 standards. As such, the Proposed Project's operational emissions would not exceed the SCAQMD regional thresholds for ROG, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$; refer to **Table 4.3-3**. Therefore, a less than significant impact would occur in this regard.

Total Operational Emissions

As shown in **Table 4.3-3**, the total operational emissions for both summer and winter would not exceed established SCAQMD thresholds. Therefore, the Proposed Project's impacts in this regard would be less than significant.

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 VOCs 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.

As noted in the Brief of Amicus Curiae by the SCAQMD (SCAQMD 2014), the SCAQMD acknowledged 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) (SJVAPCD 2014), the SJVAPCD has acknowledged that 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 quantification from O_3, as an example, is correlated with the increases in ambient levels 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 further states that based on their 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 VOCs would reduce O_3 levels at the highest monitored site 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 VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Proposed Project would not exceed SCAQMD thresholds for construction and operational air emissions, the Proposed Project would have a less than significant impact for air quality health impacts.

Cumulative Short-Term Construction Impacts

With respect to the Proposed Project's construction-related air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2022 AQMP pursuant to Federal Clean 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 in order 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 (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted 2022 AQMP emissions control measures) would also be imposed on construction projects throughout the SCAB, which would include related projects.

According to the *SCAQMD CEQA Air Quality Handbook*, project-related emissions that fall below the established construction 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-term air quality impacts, as emissions would not exceed the SCAQMD adopted construction 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 Proposed Project's incremental construction impacts would be less than cumulatively considerable and impacts in this regard are less than significant.

Cumulative Long-Term Operational Impacts

As discussed, the Proposed Project would not result in long-term operational air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Furthermore, the Proposed Project's adherence to SCAQMD rules and regulations would help reduce operational air emissions. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the Proposed Project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant and no cumulative operational impacts would result in this regard.

Conclusion

In conclusion, the Proposed Project would not result in significant construction-related impacts, operational impacts, or cumulative impacts. As discussed above, the Proposed Project would

result in emissions below the SCAQMD thresholds and naturally occurring asbestos is not known to occur at the Proposed Project's site. As such, the Proposed Project would result in a less than significant impact related to this threshold.

4.3-c Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. CARB has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis.

The nearest sensitive receptors to the Proposed Project site are the students and faculty on-campus, as well as the single-family residential uses surrounding the Proposed Project's boundary. However, the distance from demolition, grading, and construction activities would change with each phase of construction. It should be noted that displaced school faculty and students would be relocated to different locations within the campus during construction. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction and operations impacts (stationary sources only).

Localized Significance Thresholds (LST)

LSTs were developed in response to 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 1, 2, and 5 acres emitting CO, NO_X, $PM_{2.5}$, or PM_{10}. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD notes that any project over 5 acres may need to perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The Project is located within Sensitive Receptor Area (SRA) 2, Northwest Coastal Los Angeles County area.

Construction

Total acres disturbed per day during the grading phase is based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. Based on CalEEMod results, the most soil disturbance activities would occur during Phase 1B of the construction. The Proposed Project would actively disturb approximately 1.375 acres per day during Phase 1B. LST thresholds are provided based on 1-, 2-, and 5- acre disturbed area and 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. Since the daily disturbance area is 1.375 acre, as a conservative analysis, the 1-acre LST thresholds were utilized for the construction LST analysis. The 1-acre LST thresholds has more stringent thresholds compared to the 2-acre LST

thresholds. As noted above, the closest sensitive receptors to the campus are the students and faculty located on campus, which are within 25 meters. These sensitive receptors may be potentially affected by air pollutant emissions generated during on-site construction activities. **Table 4.3-4** shows the construction-related emissions with incorporation of SCAQMD Rules 402 and 403. It is noted that the localized emissions presented in **Table 4.3-4** are less than those in **Table 4.3-2**, since localized emissions include only on-site emissions (i.e., from construction equipment and fugitive dust), and do not include off-site emissions (i.e., from hauling activities). As seen in **Table 4.3-4**, on-site emissions with SCAQMD rules applied would not exceed the LST thresholds for SRA 2. As such, the Proposed Project would result in less than significant impacts related to the construction LST.

TABLE 4.3-4 LOCALIZED SIGNIFICANCE OF CONSTRUCTION EMISSIONS

Year (Phases With Maximum Pollutants)	Pollutant (pounds/day)[2,3,4]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Phase 1A				
2026 (Demolition/Grading)[2]	12.90	14.60	3.34	1.87
2027 (Building Construction)	8.25	9.91	0.26	0.24
Phase 1B				
2028 (Grading)	8.42	9.59	2.45	1.35
Phase 2				
2027 (Grading)	8.70	9.56	2.46	1.36
2028 (Building Construction)	4.30	6.91	0.15	0.14
2029 (Building Construction)	4.11	6.89	0.14	0.13
Phase 3				
2029 (Grading)	3.73	5.54	0.30	0.12
2030 (Building Construction)	4.01	6.89	0.13	0.12
2031 (Building Construction)	3.85	6.87	0.12	0.11
Phase 4				
2031 (Grading)	7.31	9.47	2.41	1.31
2032 (Building Construction)	3.71	6.84	0.11	0.10
2033 (Building Construction/Paving)	3.75	6.83	0.12	0.11
2034 (Paving)	3.72	5.27	0.12	0.11
Maximum Daily Emissions	**12.90**	**14.60**	**3.34**	**1.87**
Localized Significance Screening Threshold[1]	**103**	**562**	**4**	**3**
Thresholds Exceeded?	**No**	**No**	**No**	**No**
Overlapping Phases[5]				
2027 (Phase 1A plus Phase 2)	16.95	19.47	2.72	1.60
2028 (Phase 1B plus Phase 2)	12.72	16.50	2.60	1.49
2029 (Phase 2 plus Phase 3)	7.84	12.43	0.44	0.25
2031 (Phase 3 plus Phase 4)	11.16	16.34	2.53	1.42
Maximum Overlap Daily Emissions	**16.95**	**19.47**	**2.72**	**1.60**
Localized Significance Threshold[1]	**103**	**562**	**4**	**3**
Thresholds Exceeded?	**No**	**No**	**No**	**No**

Notes:

1. The Localized Significance Screening Threshold was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO_X, CO, PM10, and PM2.5. The Localized Significance Screening Threshold was based on the anticipated daily acreage disturbance during grading phase for construction (approximately 1.375 acre; therefore, 1-acre thresholds were conservatively used), the distance to sensitive receptors (surrounding the Proposed Project's site; therefore 25-meter thresholds were used), and the source receptor area (SRA 2).

2. Maximum on-site emissions occur during demolition phase for CO and NO_X*. Maximum on-site PM10, and PM2.5 emissions occur during grading phase.*

3. Maximum on-site emissions occur during paving phase for NO_X, PM10, and PM2.5. Maximum on-site emissions occur during building construction phase for CO.

4. The maximum daily construction emissions include fugitive dust control measures required by SCAQMD Rule 403, which includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table are shown in Appendix A.

5. Phases 2 through 4 do not have a set construction schedule as it is based on the District's discretion on when to commence construction. As such, construction phases were assumed to have no overlap. Nevertheless, based on the District provided construction schedule, some construction activities would overlap. As such, emissions during potential overlap between phases were quantified and presented.

Refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data, for detailed model input/output data.

Operations

According to SCAQMD LST methodology, LSTs would apply to operational activities if the Proposed 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 Proposed Project does not include such uses. Thus, due to the lack of such emissions, no long-term LST analysis is warranted. Operational LST impacts would be less than significant.

Toxic Air Contaminants

As noted above, implementation of the Proposed Project would not result in long-term operation of any stationary sources of toxic air contaminants (TACs). However, construction of the Proposed Project may result in temporary increases in emissions of diesel particulate matter (DPM) associated with the use of off-road diesel equipment. Health-related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. As such, the calculation of cancer risk associated with exposure to TACs is typically calculated based on a long-term (e.g., 70-year) period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. For these reasons, exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 10 in one million). As such, impacts from TACs would less than significant.

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 (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

At the time of the publishing of the *1993 CEQA Air Quality Handbook*, the SCAB was designated nonattainment under the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the SCAB and in California have steadily declined. In 2007, SCAQMD was designated attainment for CO under both the CAAQS and NAAQS. As identified within SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide, peak carbon monoxide concentrations in the Basin were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for the SCAQMD's *2003 Air Quality Management Plan*.[2] The locations selected for microscale modeling in the CO Plan are worst-case intersections in the Basin and would likely experience the highest CO concentrations. Thus, CO analysis in the CO Plan is utilized in a comparison to the

[2] The CO Plan was not updated as part of the 2016 AQMP.

Proposed Project, since it represents a worst-case scenario with heavy traffic volumes within the Basin.

Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm 1-hour CO federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hot spots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hot spots would not be experienced at any intersections near the Proposed Project's site as the Project is not expected to generate any additional vehicle trips. Therefore, the Proposed Project's impacts would be less than significant pertaining to CO hot spots.

Conclusion

In conclusion, the Proposed Project would not result in significant air quality impacts on sensitive receptors. As discussed above, the Proposed Project would result in emissions that fall below the SCAQMD construction and operational LSTs. As such, the Proposed Project would result in a less than significant air quality impact.

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

Less than Significant Impact. According to the 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. As such, operation of the Proposed Project would not result in other emissions (such as those leading to significant odors). Impacts would be less than significant in this regard.

Construction activities associated with the Proposed Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short term in nature and cease upon the Proposed Project's completion. In addition, the Proposed Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce detectable odors from heavy-duty equipment exhaust. As such, the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and impacts would be less than significant.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
BIOLOGICAL RESOURCES. Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Overview

The Proposed Project's site is in a fully urbanized, built-out area of the City of Santa Monica. The area surrounding the Project site is developed with single- and multi-family housing. No parks or areas of open space exist adjacent to the Proposed Project. The nearest park, Douglas Park, is located approximately 0.25 miles southeast. The nearest natural open space area is the Santa Monica Mountains, approximately 1.5 miles northwest.

The Proposed Project would occur within the boundaries of the existing Franklin Elementary School campus, including the school's adjacent satellite facility, which has been developed and used for school-related activities since its original construction in 1924. The school is located in a neighborhood and is immediately surrounded by single- and multi-family residences. The school campus contains grass on the

front lawn and on the athletic field, and several mature landscaping trees, mostly along the school frontage at Montana Avenue and along Idaho Avenue.

Native and introduced wildlife species that are tolerant of human activities also thrive in urban biological communities. Some wildlife species that may occur in urban areas include: coyotes (*Canis latrans*); North American opossum (*Didelphis virginiana*); rabbits (order *Lagomorpha*); raccoons (*Procyon lotor*); striped skunks (*Mephitis mephitis*); house mouse (*Mus musculus*); Norway rat (*Rattus norvegicus*)*;* western gray squirrels *(*Sciurus *griseus);* western fence lizard (*Sceloporus occidentalis*); American crow (*Corvus brachyrhynchos*); common barn own (*Tyto alba*); red-tailed hawk (*Buteo jamaicensis*); rock pigeon (*Columba livia*); European starling (*Sturnus vulgaris*); house sparrow (*Passer domesticus*); Brewer's blackbird (*Euphagus cyanocephalus*); western scrub-jays *(Aphelocoma californica);* and house finch (*Carpodacus mexicanus*) (California Wildlife Center 2024).

Special-Status Species

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

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

The potential for special-status species to occur within the Proposed Project's site or be adversely impacted by the Proposed Project was evaluated based on the site conditions and the Project description. Given the disturbed and urban nature of the Proposed Project's site, the Proposed Project's site does not support suitable habitat for any special-status species.

Project Design Feature

The Proposed Project would implement the following Project Design Feature (PDF):

PDF-BIO-1: The Migratory Bird Treaty Act (MBTA) protects all migratory birds and their nests and makes it unlawful to "take" (e.g., pursue, kill, harm, harass) any migratory birds, their eggs, or active nests. Construction activities would be required to comply with the MBTA and, as such, nesting bird surveys would be conducted prior to the start of construction activities that may occur during nesting season (February 1 through August 31). To ensure compliance with the MBTA requirements, a qualified biologist would conduct a nest survey within one week prior to the commencement of construction during the nesting season. If active migratory bird nests are found within the construction area then a temporary 50-foot buffer shall be established around the nest(s) until the young have fledged, as determined by a qualified biologist. Alternatively, if project-related activities within the temporary nest disturbance buffer are determined to be necessary, then a

qualified biologist experienced with avian behavior shall be retained to monitor the nest through the nesting season and to determine when the young have fledged. If nesting birds begin to exhibit agitated behavior, such as defensive flights at intruders, getting up from a brooding position, or flying off the nest, the qualified biologist shall have the authority to stop construction activities within the 50-foot buffer area.

Discussion of Impacts

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

Less than Significant Impact. The Proposed Project's site is currently fully developed with educational facilities and located in an urbanized residential setting. While there are several open space areas with mature trees within 1 mile of the school, such as the Brentwood Country Club and Riviera Country Club golf courses and Douglas Park, these areas have been developed with mostly non-native landscaping, are frequented by people, and are subjected to regular anthropogenic disturbances such as landscaping and maintenance activities. Due to the developed nature of the Proposed Project site and vicinity, the vegetation and animal species supported in the limited ornamental, non-native landscaping include species that are commonly found in urban environments. The California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) shows that there have been endangered, rare, or threatened species identified in the Beverly Hills Quadrangle (in which the Proposed Project's site is located) (CDFW 2024); however, the Proposed Project's site contains neither any Critical Habitat, as delineated by the United States Fish and Wildlife Service (USFWS), nor does it contain the habitat necessary to support any of the listed species (USFWS 2024). Furthermore, despite the low likelihood of migratory bird nesting on the campus, the Proposed Project would implement PDF-BIO-1 in compliance with the MBTA requirements to protect avian species. Given the fully disturbed nature of the Proposed Project's site, there is limited potential for the presence of special-status species at the site, and impacts would be less than significant.

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

No Impact. The Proposed Project's site is currently fully developed and located in an urbanized residential setting, and does not contain any riparian habitat or other natural habitat as designated by the CDFW and USFWS. Vegetation on-site is limited to ornamental landscaping and there are no native plant communities on-site. The Proposed Project would not have an effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS. Therefore, no riparian habitats or natural communities would be impacted.

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

No Impact. The Proposed Project would not impact federally protected wetlands as defined by Section 404 of the Clean Water Act (e.g., marsh, vernal pool, coastal) through direct removal, filling, hydrological interruption, or other means. The Proposed Project's site is currently developed and located in an urban setting and does not contain any wetlands identified by the National Wetlands Inventory (USFWS 2024). The nearest estuarine and marine wetland to the Proposed Project's site is located approximately 1.8 miles to the southwest in the Pacific Ocean. Therefore, no impact would occur.

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

Less than Significant Impact. Implementation of the Proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The Proposed Project site is an existing school, located in an urbanized residential environment; it does not contain any watercourse, greenbelt, or open space for wildlife movement.

The proposed improvements with Phase 1 would require removal of 11 existing ornamental, non-native trees relative to the main school campus and 3 existing trees relative to the satellite campus (refer to **Figure 3-5, Tree Protection Plan**), all of which are landscaping and shade, ornamental, and non-native trees. No sensitive tree species would be removed.

Landscaped trees and shrubs and structures present within the Proposed Project area may provide nesting habitat for native bird and raptor species protected under the federal MBTA and California Fish and Game Code sections 3503 et seq. If an active nest is located, the nest would be protected to ensure compliance with the MBTA. Based on the analysis above, the Proposed Project would not 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. Any impacts in this regard would be less than significant.

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

Less than Significant Impact. As stated, the proposed improvements with Phase 1 would require removal of 11 existing trees relative to the main school campus and 3 existing trees relative to the satellite campus, all of which are landscaping and shade, ornamental, and nonnative trees; no sensitive tree species would be removed. For the main campus, one street tree (bottle tree, *Brachychiton populneus*) within the public right-of-way would be removed along Idaho Avenue. The other 10 trees to be removed are located within the site interior and include three tipu trees (*Tipuana tipu*), two Australian willow (*Geijera parviflora*), and five rotundiloba sweetgum

(*Liquidambar styraciflua 'Rotundiloba'*). For the satellite campus, one street tree (Australian willow, *Geijera parviflora*) would be removed along 25th Street; two other trees to be removed are located within the site interior and are jacaranda (*Jacaranda mimosifolia*). Refer to **Figure 3-5, Tree Protection Plan**.

The City of Santa Monica has a tree protection ordinance that applies to trees within City public property. Public schools are not considered public property under the SMMC; therefore, the City's ordinance does not apply to the trees removed within the school facility areas.

However, as the Proposed Project would remove two street trees within City public property along Idaho Avenue and 25th Street, the District would comply with the tree protection ordinance, which entails obtaining a City permit authorizing the removals. Further, the SMMUSD is committed to taking the necessary measures to protect and preserve the campus urban forests wherever possible. While the Proposed Project would remove trees within the school campus that are not protected by a preservation policy or an ordinance, the Proposed Project would also relocate or plant additional trees exceeding the number of trees removed. The impacts of tree removal and/or relocation would be less than significant.

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

***No Impact*.** The campus is in an urban area that contains some open space and mature trees. However, no natural community or habitat conservation plans apply to the campus. As such, implementation of the Proposed Project would have no potential to affect such plans. No impact would occur in this regard.

4.5 CULTURAL RESOURCES

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

This section is based, in part, on the Historical Resources Inventory Report, dated August 2022, and the Historical Resources Technical Report dated October 2022, both prepared for the Proposed Project by Architectural Resources Group (ARG); refer to Appendices B-1 and B-2, respectively. Subsequently, to evaluate design revisions made to the proposed Campus Plan after these studies were originally prepared, an addendum to the Historical Resources Technical Report was prepared by ARG in March 2025; refer to Appendix B-3, Review of Updated Campus Plan, Franklin Elementary School, Santa Monica. A historical resources records search was also conducted at the South Central Coastal Information Center for the school campus and a 0.25-mile radius; refer to Appendix B-4.

Overview

Portions of Franklin Elementary School were initially constructed as early as 1924. Based on the City of Santa Monica's Historical Resources Inventory process from 1993, 2007, 2008, and 2016, Franklin Elementary School was identified as potentially eligible for local designation as an individual resource. As discussed in the Historical Resources Inventory Report (ARG 2022a; see Appendix B-1), Franklin Elementary School as a whole does not appear eligible for federal, state, or local listing. However, Building B (Main Building), which is the original campus building from 1936 (renovated in 1952) and the historical anchor of the Franklin Elementary School campus, appears to be individually eligible for listing in the California Register of Historical Resources (CRHR or California Register) and for local (City of Santa Monica) listing. Building B is associated with important patterns of history related to Santa Monica's civic and institutional development, and is also a good example of Public Works Administration Moderne architecture and a singularly significant work of master architects Marsh, Smith, and Powell. The evaluation of the historical resources on the school campus also included the lawn immediately north of the Main Building. Interior spaces associated with the Main Building have been extensively modified over time and were determined to lack integrity (ARG 2022a).

The records search identified that four cultural resources studies were previously performed within a 0.25-mile radius of the school; of these, one study overlapped the campus. Other than the historical resources on the campus, the cultural resources records search did not identify any archaeological sites documented within the school or within a 0.25-mile radius; refer to Appendix B-4.

Discussion of Impacts

4.5-a Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5?

Less than Significant Impact. According to the CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

As discussed above, the original campus building (Main Building) on the Franklin Elementary School site was evaluated for historical significance and determined to be individually eligible for listing in the CRHR and for local (City of Santa Monica) listing. The evaluation also included the lawn at the front (north) of the site. No other buildings or site features on the campus satisfy the definition of a historical resource for purposes of CEQA (ARG 2022a).

The Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings, none of which are historical resources. The Main Building, including its associated landscape, would be retained during all phases of construction. The Proposed Project would result in some alterations to the Main Building during Phase 4, which would involve interior renovations of the building. Such renovations would include upgrades to the administrative and teacher support spaces and restrooms on the first floor, as well as provision of two teaming areas and a special education classroom on the second floor. As discussed above, interior spaces in the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. Such spaces are not included in the list of character-defining features of the historical resource, and interior alterations to the building would therefore not result in the removal or destruction of historic fabric (ARG 2025). Additionally, a one-story projecting volume, which was a later addition to the building, would be removed at the Main Building's northeast corner with the Proposed Project. This volume is not associated with the building's historic design and its removal would therefore not result in the destruction of historic fabric, nor would it significantly change the appearance of the historical resource when viewed from the public-right-of-way on Montana Avenue. Further, the Proposed Project would retain the existing landscape at the front (north) of the Main Building, which is a part of the historical resource. Enhancements to the existing lawn would occur, and additional fencing would be installed; refer also to **Table 3-1, Summary of Existing and Proposed Campus Plan Facilities**.

Additionally, new buildings and outdoor spaces, including the Maker-Space building, classroom building, and cafeteria and culinary education building, would not require demolition or alteration of the Main Building. The Maker-Space building and the replacement cafeteria/culinary arts building would be physically separated from the Main Building and would be located at a considerable distance behind the historical resource. The replacement classroom building would be two stories tall, similar to the Main Building, and would read as a more visually prominent component of the campus than the existing one-story buildings. However, the new classroom

building would be located in the eastern side of the campus, whereas the Main Building occupies a prominent central location at the front (north) of the campus and would continue to read as a focal point of the campus as well as its primary entrance. The new classroom building would result in some changes to the immediate setting of the Main Building by introducing additional massing adjacent to the historical resource, but would not compromise the important spatial relationship that historically and currently exists between the Main Building and Montana Avenue. The sequence of entry from the street, through the lawn, and to the entrance of the Main Building would remain intact. Additionally, the new classroom building would not be physically attached to the Main Building. The Main Building would continue to retain its integrity of setting following completion of the Proposed Project.

For the reasons above, the Proposed Project as currently designed was determined to not result in a direct impact on historical resources. The Proposed Project would not result in the demolition or material impairment of the significance of the Main Building and would therefore not cause a substantial adverse change to the significance of the historical resource. The Main Building would retain all of its character-defining features and would continue to retain sufficient integrity to convey its historical significance. Therefore, the Main Building would remain individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark at completion of construction (ARG 2025).

Additionally, the Proposed Project would not result in a direct impact on the potential Montana Avenue Multi-Family Residential Historic District which includes the Franklin Elementary School campus. The Proposed Project's site is currently a noncontributor to the potential historic district and would remain as such upon the Proposed Project's completion (ARG 2022b; ARG 2025). The district would remain eligible for local designation as a City of Santa Monica Landmark once construction of the Proposed Project is completed. Further, no indirect impacts on historical resources would occur due to the lack of historical resources located adjacent to the Proposed Project site (ARG 2025).

The Proposed Project, as designed, would not result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5. Impacts in this regard would be less than significant. Refer to Appendices B-2 and B-3 for additional discussion.

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

***Less than Significant Impact with Mitigation Incorporated*.** The campus is a developed site, located within an urbanized residential portion of the City of Santa Monica. Construction of each phase of the Proposed Project would generally involve demolition of some existing on-site structures, followed by minor grading and foundation work, building construction and/or renovation, and architectural coating. The records search results reveal that one built environment resource has been identified within the project area, which is recommended for listing in the California Register. While no archaeological resources have been documented on the school campus or within a 0.25-mile radius, there is a possibility of unanticipated archaeological discoveries during the Proposed Project's construction, especially during grading or excavation

for new building foundations, which could have the potential to impact unknown archaeological resources. While the potential for discovery of unknown archaeological resources is considered low due to the maximum anticipated depth of excavation of 6 feet and the developed nature of the site (which likely contains engineered fill below the ground surface), unanticipated and accidental archaeological discoveries may be potentially significant. Therefore, the Proposed Project would implement mitigation measure **CUL-1**, which requires a Qualified Archaeologist to conduct sensitivity training in advance of ground-disturbing activities for each phase and to be retained and available during the Proposed Project's ground disturbance. It also provides measures to be taken in the event that cultural resources are inadvertently discovered during the Proposed Project's construction. With implementation of mitigation measure **CUL-1,** impacts to archaeological resources would be reduced to a less than significant level.

Mitigation Measure:

CUL-1 Prior to ground-disturbing activities for the Project (for each individual phase of the Project), the 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 shall be on-call during all grading that would exceed a depth of 5 feet. The Qualified Archaeologist shall ensure that the following measures are followed for the Project:

- Prior to any grading activities that would exceed a depth of 5 feet, 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 made during construction.
- In the event that unanticipated cultural material is encountered during any phase of project construction, all construction work within 100 feet of the find shall cease and the Qualified Archaeologist shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the Qualified Archaeologist, work shall be permitted to continue in the area.
- If a find is determined to be important by the Qualified Archaeologist, he or she shall immediately notify the District. The District shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the California Register of Historical Resources. Work may not resume within the no-work radius (to be determined and established by the Qualified Archaeologist) until the lead agency, through consultation as appropriate, determine that the site either: (1) is not eligible for the California Register of Historical Resources; or (2) that the treatment measures have been completed to their satisfaction.

Level of Significance: Less than significant with mitigation incorporated.

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

Less than Significant Impact. The campus is developed and has been used for school-related activities since 1924. No known burial sites are located within the Proposed Project's site and the area has been previously disturbed by development. In the unlikely event human remains or funerary objects are discovered during the Proposed Project's related ground-disturbing activities, Health and Safety Code section 7050.5, CEQA Guidelines section 15064.5, and Public Resources Code section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, Health and Safety Code section 7050.5 requires that if human remains are discovered on a project site, disturbance of the site shall remain halted until the County coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in section 5097.98 of the Public Resources Code. If the County coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Compliance with existing law regarding the discovery of human remains would ensure that the Proposed Project's potential impacts to human remains would be less than significant.

4.6 ENERGY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
ENERGY. Would the Project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Overview

Regulatory Framework

State of California

Assembly Bill 2076. Pursuant to Assembly Bill 2076, the California Energy Commission (CEC) and California Air Resources Board (CARB) prepared and adopted a joint-agency report in 2003, titled Reducing California's Petroleum Dependence. The report included recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita vehicle miles traveled (VMT). One of the performance-based goals of Assembly Bill 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports (IEPR), the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

California Energy Commission Integrated Energy Policy Report. In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the CEC to develop an integrated energy policy report 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 2023 Integrated Energy Policy Report (2023 IEPR) on February 14, 2024. The 2023 IEPR 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. The 2023 IEPR discusses speeding connection of clean resources to the electricity grid, the potential use of clean and renewable hydrogen, and the California Energy Demand Forecast to 2040.

Renewables Portfolio Standards. First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030. SB 350, signed October 7,

2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are to (1) increase the procurement of electricity from renewable sources from 33 percent to 50 percent and (2) double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and states that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include:

- Determining annual procurement targets and enforcing compliance;
- Reviewing and approving each investor-owned utility's renewable energy procurement plan;
- Reviewing contracts for RPS-eligible energy; and
- Establishing the standard terms and conditions used in contracts for eligible renewable energy.

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6). In 1978, the CEC established Title 24, Part 6 of the California Code of Regulations (CCR), which are California's energy efficiency standards for residential and nonresidential buildings. Title 24, Part 6, also referred to as the California Energy Code, was codified 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. California's energy efficiency standards are updated on an approximate three-year cycle. The 2022 California Energy Code became effective on January 1, 2023.

California Green Building Standards (CCR Title 24, Part 11). The California Green Building Standards Code (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 Code requires new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design, energy efficiency, water efficiency and conservation. material conservation and resource efficiency, and environmental quality. The CALGreen Code also provides voluntary tiers and measures that local governments may adopt to encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2022 and became effective on January 1, 2023.

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.

City of Santa Monica

On October 11, 2022, the City of Santa Monica reviewed and adopted the final draft of the 6th Cycle Housing Element. The City of Santa Monica General Plan Housing Element includes policies and objectives

to facilitate sustainable housing development and to maintain current energy conservation and production programs. 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 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 within Article 8 apply to the construction, alteration, moving, demolition, repair, site preparation, use, maintenance and occupancy of buildings, structures and building service equipment, and shall 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 Municipal Code.

Santa Monica-Malibu Unified School District

Districtwide Plan for Sustainability

The District adopted the *Districtwide Plan for Sustainability* (Sustainability Plan) in March 2019 with the following objectives: providing a strategic road map 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. 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 (CHPS) Criteria

The Collaborative for High Performance Schools (CHPS) began in November 1999, when CEC called together Pacific Gas and Electric Company, San Diego Gas and Electric, and Southern California Edison (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 that has since crested and retreated over the last few years of recession. The CHPS Criteria has always emphasized 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 (CEI) in partnership with SCE and the Southern California Gas Company. CEI is a consultative service aimed at helping commercial customers engage in long-term, strategic energy planning. Subsequently, the District has partnered with consulting firm Ecova 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.

Methodology

The following impact analysis focuses on the three sources of energy that are relevant to the Proposed Project: electricity and natural gas associated with the Proposed Project's operations and the fuel consumption for the Proposed Project's construction. It should be noted that as the Proposed Project does not involve increasing the school capacity, the Proposed Project is not expected to generate any additional vehicle trips during operations. The analysis of electricity and natural gas usage during the Proposed Project's operation is based on the California Emissions Estimator Model (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. The results of the CalEEMod modeling are included in Appendix A, Air Quality/Greenhouse Gas/Energy Data. The estimated construction fuel consumption is based on the Proposed 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 A.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis under Response 4.6-a 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 may be 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 Criterion 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 Criterion 2, 4, and 6, and the building energy demand analysis discusses Criterion 2, 3, 4, and 5.

Discussion of Impacts

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

***Less than Significant Impact*.** Estimated energy consumption resulting from the Proposed Project is summarized in **Table 4.6-1** and **Table 4.6-2**. As shown in **Table 4.6-1**, the Proposed Project's maximal off-road construction fuel consumption would occur during Phase 1A and would increase Los Angeles County's off-road fuel consumption by 0.0840 percent in 2026. The Proposed Project's maximal on-road construction fuel consumption would occur during Phase 2 and would increase Los Angeles County's on-road fuel consumption by 0.0002 percent in 2027. It should be noted that while the Proposed Project would change a portion of the buildings and layout of the campus, the Proposed Project 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 operation when compared to existing conditions. In addition, the Proposed Project would not substantially modify the travel distance to the school, which could otherwise potentially result in an increase in average trip lengths. As such, no increase to operational fuel consumption is anticipated. As shown in **Table 4.6-2**, the Proposed Project's net increase of energy usage during operations would constitute an approximate 0.0003 percent increase over Los Angeles County's typical annual electricity consumption and an approximate 0.0002 percent increase over Los Angeles County's typical annual natural gas consumption (**Criterion 1**).

TABLE 4.6-1 PROPOSED PROJECT AND COUNTYWIDE ENERGY CONSUMPTION DURING CONSTRUCTION

Phase	Fuel Type	Project Construction Fuel Consumption (gallons)[1]	Los Angeles County Annual Fuel Consumption[2]	Percentage Increase Countywide
Phase 1A	Off-Road	26,935	32,057,095	0.0840%
Phase 1A	On-Road	4,192	3,981,438,709	0.0001%
Phase 1B	Off-Road	7,493	32,391,139	0.0231%
Phase 1B	On-Road	4,278	3,833,940,155	0.0001%
Phase 2	Off-Road	25,650	372,065,656	0.0800%
Phase 2	On-Road	9,213	3,905,748,751	0.0002%
Phase 3	Off-Road	22,415	32,388,718	0.0692%
Phase 3	On-Road	5,131	3,765,389,689	0.0001%
Phase 4	Off-Road	20,515	32,595,074	0.0629%
Phase 4	On-Road	4,385	3,642,196,563	0.0001%

Source: Refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data.

[1] Proposed Project's fuel consumption calculated based on CalEEMod results. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model for on-road fuel projections and California Air Resources Board Off-Road Emission Inventory for off-road fuel projections.

[2] Each phase's increase in fuel consumption during construction is compared with the projected Countywide fuel consumption in the year when construction is projected to start: 2026 for Phase 1A, 2028 for Phase 1B, 2027 for Phase 2, 2029 for Phase 3, and 2031 for Phase 4; refer to Appendix A.

TABLE 4.6-2 PROPOSED PROJECT AND COUNTYWIDE ENERGY CONSUMPTION DURING OPERATION

Energy Type	Project Annual Energy Consumption[1]	Los Angeles County Annual Energy Consumption[2]	Percentage Increase Countywide[2]
Electricity Consumption	196 MWh	68,484,956 MWh	0.0003%
Natural Gas Consumption	6,144 therms	2,820,285,935 therms	0.0002%

Source: Refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data. Data from CalEEMod model titled "Franklin ES Full Buildout Operations Detail Report" was utilized for this table.

[1] As modeled in CalEEMod version 2022.1.

[2] The Project's increases in electricity and natural gas consumption are compared to the total consumption in Los Angeles County in 2022, the most recent available consumption data. Los Angeles County electricity consumption data source: California Energy Commission, Electricity Consumption by County, http://www.ecdms. energy.ca.gov/elecbycounty.aspx, accessed October 16, 2024.
Los Angeles County natural gas consumption data source: California Energy Commission, Gas Consumption by County, http://www.ecdms.energy. ca.gov/gasbycounty.aspx, accessed October 16, 2024.

Construction-Related Energy

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 used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, building construction, paving, and architectural coatings. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during

construction through compliance with State requirements that heavy-duty diesel equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction **(Criterion 4).**

The Project-related incremental increase in the use of energy bound in construction materials, such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas), would not substantially increase demand for energy compared to overall local and regional demand for construction materials. Fossil fuels for construction vehicles and other energy-consuming equipment would be used during clearing, grading, building construction, paving, and architectural coatings. As indicated in **Table 4.6-1**, the maximal off-road fuel consumption during any one phase of the Proposed Project's construction would be approximately 26,935 gallons (during Phase 1A), which would result in a nominal increase (0.0840 percent) in fuel use in the County. Similarly, the maximal on-road fuel consumption during any one phase of the Proposed Project's construction would be approximately 9,213 gallons (during Phase 2), which would result in a nominal increase (0.0002 percent) in fuel use in the County. As such, the Proposed Project's construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Proposed Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State **(Criterion 5)**. Additionally, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13, Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the EPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements, such as the current 2022 CALGreen Code, the Proposed Project would comply with construction waste management practices to divert a minimum of 65 percent of construction debris. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects. As such, a less than significant impact would occur.

Operational Energy

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. 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 operation 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 on-site to accommodate at least 10 percent of the 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 are 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 2024 to 2040 forecasts for energy consumption and peak demand in support of the 2023 IEPR for each of the major electricity and natural gas planning areas and the state based on the economic and demographic growth projections (CEC 2023: 130). CEC forecasted baseline electricity consumption grows at a rate of about 1.7 percent annually through 2040. The natural gas consumption grows at a rate of about 0.2 percent annually through 2035.[3] As shown in **Table 4.6-2**, operational energy consumption of the Proposed Project would represent approximately 0.0003 percent increase in electricity consumption and approximately 0.0002 percent increase in natural gas consumption over the current Countywide usage, which would be substantially below the CEC's forecasts and the current Countywide usage. 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 commercial developments and would consume energy during normal business hours. As a result, the Proposed Project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

According to the District, the Proposed Project would adhere to and exceed the most current CHPS Criteria by 25 percent. It should be acknowledged that standards under 25 percent exceedance to CHPS Criteria would be more stringent than those under the 2022 Title 24 in regard to building energy usage. However, due to the speculative nature of the Proposed Project's specifics in this stage of development, only adherence to 2022 Title 24 standards were assumed and modeled in CalEEMod for building characteristics to be conservative. Therefore, **Table 4.6-2** provides a conservative analysis, utilizing energy consumption rates for buildings constructed under 2022 Title 24 standards. The 2022 Title 24 standards provide minimum efficiency standards

[3] Based on the *2023 Integrated Energy Policy Report*, the gas forecast is updated every two years, in odd years. As such, the natural gas consumption shown here is based on the California Energy Commission, *Final 2022 Integrated Energy Policy Report Update* (page 140).

related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. 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, SCE, the electricity provider, is subject to California's Renewables Portfolio Standard reflected in SB 100. The Renewables Portfolio Standard requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60 percent of total procurement by 2030 and 100 percent of total procurement by 2045. Renewable energy is generally 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, in October 2023, the District transitioned back to 100 percent renewable electricity and is recognized as a Clean Power Alliance Green Leader.[4] 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 the Proposed Project's operation, or preempt future energy development or future energy conservation, and a less than significant impact would result.

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

***Less than Significant Impact*.** 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 4.6-3**. 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 road map 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, ventilation systems, and 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,

[4] Santa Monica-Malibu Unified School District, *Energy Efficiency and Renewables*, https://www.smmusd.org/Page/5632, accessed October 23, 2024.

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 4.6-3 DISTRICTWIDE PLAN FOR SUSTAINABILITY CONSISTENCY ANALYSIS

Recommended Strategies	Proposed Project's 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 turned off when unoccupied.	**Consistent**. All proposed indoor spaces on-site would install occupancy sensors.
Establish lighting and equipment efficiency standards for all new equipment that meet or exceed Title 24 standards.	**Consistent**. Although this strategy does not mean to be implemented directly by any individual project, all lighting and appliances of the Proposed Project would meet or exceed the most recent Title 24 standards. According to the District, the Proposed Project would adhere to and exceed the most current CHPS Criteria by 25 percent. It should be acknowledged that standards under 25 percent exceedance to CHPS Criteria would be more stringent than those under 2022 Title 24 in regard to building energy usage. However, due to the speculative nature of the Proposed Project's specifics in this stage of development, 2022 Title 24 standards were assumed and modeled in CalEEMod for building characteristics to be conservative.
Install solar PV on the District sites included in the solar Phase 1 project scope.	**Consistent**.. All new buildings constructed with Phases 1 to 4 of the Proposed Project would incorporate solar photovoltaic panels.
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.
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 that would be compatible with any District-implemented energy management strategies, such as connection between wireless thermostats and energy management systems (EMS).
Install 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 that would be compatible with any District-implemented energy management strategies, such as connection between wireless thermostats to the EMS.

TABLE 4.6-3, CONTINUED

Recommended Strategies	Proposed Project's 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™.	
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. It should be acknowledged that standards under 25 percent exceedance to CHPS Criteria would be more stringent than those under 2019 Title 24 in regard to building energy usage. However, due to the speculative nature of the Proposed Project's specifics in this stage of development, 2022 Title 24 standards were assumed and modeled in CalEEMod for building characteristics to be conservative.

Source: SMMUSD 2019.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
GEOLOGY AND SOILS. Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

This section is based, in part, on the Geotechnical Exploration Report - New Classroom Buildings & Parking Lot, prepared by Verdantas in February 2025, and included as Appendix C. Other evaluations have been prepared for the Proposed Project, which are on file at the SMMUSD Facility Improvement Projects Office located at 2828 4th Street, Santa Monica, CA 90405, and are available for public viewing. These include the following:

- Seismic Hazard Assessment Report, Leighton Consulting, Inc., September 2023.
- Fault Rupture Hazard Review for Franklin Elementary School - New Master Campus Plan, California Department of Conservation, January 2024.
- Geotechnical Exploration Report - New Makerspace Building, Leighton Consulting, Inc. January 2022.

- Response to Review Comments - New Makerspace Building, Leighton Consulting, Inc., February 2023.
- Seismic Hazard Assessment Report - Master Campus Plan, Leighton Consulting, Inc., September 2023.

Overview

The Proposed Project site is in the Santa Monica Plain, an uplifted and inclined alluvial surface within the southwestern block of the Los Angeles Basin. The Los Angeles Basin, a structural trough, is a northwest-trending alluviated lowland plain approximately 50 miles long and 20 miles wide. Mountains and hills that generally expose Late Cretaceous to Late Pleistocene-age sedimentary and igneous rocks bound the basin along the north, northeast, east, and southeast. The basin is part of the Peninsular Ranges geomorphic province of California, which is characterized by subparallel blocks sliced longitudinally by young, steeply dipping northwest-trending fault zones. The basin, located at the northerly terminus of the Peninsular Ranges, is the site of active sedimentation and the strata are interpreted to be as much as 31,000 feet thick in the center of the synclinal trough of the basin's central block (Verdantas 2025).

According to the Geotechnical Exploration Report, artificial fill materials were encountered within the Proposed Project's site to a depth of approximately 1.5 to 5 feet below grade (Verdantas 2025). The fill is characterized as dark brown to reddish brown sandy lean clay to silty clay with varying amounts of slaty gravel. As no documentation or records related to fill placement were available during the preparation of the report, all fill encountered on-site and anticipated in future explorations is considered undocumented and unsuitable for support of new improvements in its current condition. The artificial fill is directly underlain by Quaternary old alluvial fan deposits. These Pleistocene alluvial fan deposits generally consist of brown, dark grayish brown, and reddish brown silty clay and sandy clay locally channelized with sand and slaty gravels. In general, the fine-grained material ranges from very stiff to hard. The channelized coarse-grained soils consist of a series of fining upward sequences and range from medium dense to very dense (Verdantas 2025).

Discussion of Impacts

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

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

Based on review of geologic literature and aerial photography, the Proposed Project is partially located within a mapped Alquist-Priolo Earthquake Fault Zone (Verdantas 2025); these zones are defined along Holocene (i.e., in the last 11,700 years) active faults. Specifically, according to the California Geological Survey (CGS), the Proposed Project's site is mapped within the Santa Monica Fault Zone (SMFZ), which was established by the CGS Fault Evaluation Report 259 dated June 28, 2017. The boundaries of the SMFZ are located approximately 580 feet north and 1,300 feet south of the Proposed Project's site. The fault itself is mapped by the CGS as crossing the southwestern corner of the Franklin Elementary School campus (Verdantas 2025). Other several active and

potentially active faults mapped within proximity to the Proposed Project's site include the Malibu Coast Fault (approximately 2.5 miles northeast), the Newport Inglewood Fault (approximately 5.4 miles east), the Hollywood Fault (approximately 5.4 miles northeast), and the Palos Verdes Fault (approximately 20 miles south).

A fault hazard assessment of the school campus was conducted in late 2022 and included three continuous core borings and 25 core penetrometer test soundings to depths ranging from 30 to 50 feet below ground surface (bgs) along the northeast property boundary. The assessment determined that an active trace of the Santa Monica Fault Zone is not present within the northern and central limits of the Proposed Project site (Verdantas 2025). An additional seismic hazard assessment was performed in summer 2023 in the southeastern portion of the campus. An approximately 90-foot long and 11½-foot deep fault trench was excavated at the southern corner of the existing playfield to evaluate the potential for Holocene active faulting within the southern limits of the campus. It was concluded that the site is free of Holocene active faults, and no structural setbacks were therefore recommended. The report was approved by CGS in its *Fault Rupture Hazard Review* letter dated January 12, 2024; however, CGS concluded that additional exploration may be required in the southwestern portion of the campus if a new habitable structure is considered in the area (Verdantas 2025). The Proposed Project would relocate the sports playing field to the southwestern portion of the site. Therefore, no habitable structures are planned for this area. The evaluation concluded that active faults do not underlie the explored area, and therefore, the potential for surface fault rupture at the campus is considered low (Verdantas 2025).

Notwithstanding, the Proposed Project would implement the recommendations identified in the geotechnical evaluation (Verdantas 2025) which include criteria for soil excavation depths; satisfactory selection, placement, and compaction of fill; and other measures. Additionally, all development would occur in accordance with 2022 California Building Code requirements.[5] Based on the above, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, such impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. A historical seismicity search for a 62-mile radius surrounding the campus revealed that the largest magnitude earthquake recorded, at 7.7, was the Arvin-Tehachapi earthquake; this quake occurred on July 21, 1952, approximately 73 miles from the campus, and produced an estimated peak ground acceleration (PGA) of approximately 0.05 units of gravity (g) at the site (Verdantas 2025). The largest estimated PGA found in the search was approximately 0.23 g from the magnitude 6.7 Northridge earthquake in January 1994, located approximately 12.5 miles north of the Proposed Project's site. Review of additional data publicly available from the Center for Engineering Strong Motion Data showed that a site located near the

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

corner of 19th Street and Wilshire, approximately 0.5 miles southwest of the campus, experienced a PGA of 0.15 g from the March 17, 2014, magnitude 4.4 Encino earthquake. Another site at Providence St. John's Hospital, approximately 0.6 miles south of the campus, experienced a PGA of 0.03 g from the magnitude 5.4 Chino Hills earthquake on July 29, 2008, but did not report any damage from earthquakes occurring over the last century. For context, the 2022 California Building Code provides site-specific seismic design parameters for a PGA of 0.907 g, which would be adequate to withstand any projected seismic ground shaking. As the Proposed Project's site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking during an earthquake on one of the many Southern California faults, the Proposed Project would implement the geotechnical recommendations as previously described, and development would occur in accordance with the 2022 California Building Code. Through compliance with these regulatory requirements and the utilization of appropriate seismic design, potential impacts relating to seismic shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

***Less than Significant Impact*.** Liquefaction is the loss of soil strength due to a buildup of excess pore-water pressure during strong and long-duration ground shaking. Liquefaction is associated primarily with loose (low density), saturated, relatively uniform fine- to medium-grained, clean cohesionless soils. As shaking action of an earthquake progresses, soil granules are rearranged and the soil densifies within a short period, which results in a buildup of pore-water pressure. Liquefaction then occurs when soil shear strength reduces abruptly and the loose sand and silt behaves like a liquid. Overall, for liquefaction to occur there must be: (1) loose, clean granular soils, (2) shallow groundwater, and (3) strong, long-duration ground shaking.

The Beverly Hills Quadrangle Seismic Hazard Zone Map and the City of Santa Monica Geologic Hazards map indicate that the Proposed Project's site is not located within an area potentially susceptible to liquefaction. As previously described, the Proposed Project's site is underlain by stiff to hard clays interbedded with medium dense to dense sands and slaty gravels and groundwater is interpreted below a depth of 40 to 50 feet. Given these factors, the potential for liquefaction and lateral spreading to affect the campus is considered low. In addition, the potential seismically induced settlement at the site is estimated to be on the order of 0.5 inches or less (Verdantas 2025). As such, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, such as liquefaction. Therefore, such impacts would be less than significant.

iv) Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Proposed Project's site and surrounding area are fully developed and characterized by relatively flat topography. As evaluated in the Geotechnical Exploration Report, the campus is not located in an area mapped as potentially susceptible to seismically induced landslides (Verdantas 2025). No landslides are mapped or known to exist at the Proposed Project's site or vicinity, and the Proposed Project's site is not located adjacent to a significant slope. The potential for seismically induced landslides to affect the Proposed Project's site is considered low.

The Proposed Project would conform with standard structural design requirements from the current building code. As such, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impact related to landslides would occur.

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

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

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

Less than Significant Impact. Based on geotechnical laboratory testing performed on selected samples, the soils on the campus are not susceptible to collapse (Verdantas 2025). Furthermore, the potential for lateral spreading, liquefaction, and subsidence was addressed under Response 4.7-a(iii) and it was determined that related impacts would be less than significant. Therefore, the Proposed Project would not be located on soils that are unstable or that would become unstable as a result of the Proposed Project and related impacts would be less than significant.

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

***Less than Significant Impact*.** Expansive or shrink-swell soils are soils that swell when subjected to moisture and shrink when dry. Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. According to California Building Code section 1803A.5.3, expansive soils are those soils with an Expansion Index (EI) of 20 or greater. Based on testing of boring samples collected from the campus, the expansion properties of the soil below the Proposed Project's range from EI 21 to EI 50, which indicates that expansion is considered to be low (Verdantas 2025). Nonetheless, as the clayey nature of the near-surface soils expansion potential is anticipated to vary, additional testing of soils, as recommended in the geotechnical study (Appendix C), upon completion of grading should be performed to confirm the results of the initial testing. As such, the soils lying below the campus would be identified and evaluated as

to appropriate design considerations for the Proposed Project. As recommended, any required import material should consist of relatively non-expansive soils with a very low EI (< 20). All proposed import materials should be approved by the geotechnical engineer of record prior to being placed at the site. The geotechnical investigation recommendations would be implemented and enforced as part of the Proposed Project's grading plan and construction plan review and approval processes by the City of Santa Monica Community Development Department Building and Safety Division and the California Division of the State Architect, respectively. Therefore, the Proposed Project would not be located on expansive soil, and impacts related to expansive soils would be less than significant.

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

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

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

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

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

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

The potential for impacts to occur to paleontological resources depends upon the sensitivity of underlying geologic units and is further influenced by the extent and depth of grading and excavation activities. No known paleontological resources exist within the Proposed Project's area. However, the Proposed Project's site is underlain by Quaternary old alluvial fan deposits

(Verdantas 2025), which are considered to have a high sensitivity for paleontological resources. It is anticipated that maximum excavation to allow for the proposed improvements would extend approximately 6 feet bgs. Therefore, the potential exists for unanticipated discovery of paleontological resources during ground-disturbing activities, which may result in damage or destroy paleontological resources that may be present below the ground surface.

To ensure that potential effects on unknown paleontological resources are minimized or avoided during the Proposed Project's ground-disturbing activities (e.g., grading and/or excavation), implementation of mitigation measures **GEO-1** and **GEO-2** would be required. With implementation of such mitigation, impacts would be reduced to less than significant.

Mitigation Measures:

GEO-1 **Preconstruction Meeting.** A qualified professional paleontologist shall provide a preconstruction meeting for all construction workers who shall be disturbing the ground in the Project area. The preconstruction meeting shall cover paleontological resources sensitivity and safety, as well as next steps if a resource is identified.

GEO-2 **Paleontological Construction Monitoring.** A qualified professional paleontological monitor shall monitor all Project-related ground-disturbing activities exceeding a depth of 5 feet below ground surface in the affected area. If a paleontological resource is identified, the paleontological monitor shall assess the find to determine if it is significant. If it is significant, the resource shall require documentation and curation.

4.8 GREENHOUSE GASES

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

Overview

Since the early 1990s, scientific consensus has held that the world's population is releasing greenhouse gases (GHG) faster than the earth's natural systems can absorb them. These gases are released as byproducts of fossil fuel combustion, waste disposal, energy use, land use changes, and other human activities. This release of gases, such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and chlorofluorocarbons, creates a blanket around the earth that allows light to pass through but traps heat at the surface preventing its escape into space. While this is a naturally occurring process known as the greenhouse effect, human activities have accelerated the generation of GHGs beyond natural levels. The overabundance of GHGs in the atmosphere has led to an unexpected warming of the earth and has the potential to severely impact the earth's climate system.

Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. CH_4 traps over 21 times more heat per molecule than CO_2, and N_2O absorbs 310 times more heat per molecule than CO_2. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO_2e), which weight each gas by its global warming potential. Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted.

Global Climate Change

California is a substantial contributor of global GHGs, emitting over 371.1 million metric tons of carbon dioxide equivalent ($MTCO_2e$) per year (CARB 2024a). CH_4 is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect, which increases the earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

The impact of human activities on global climate change is apparent in the observational record. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global

atmospheric variation of CO_2, CH_4, and N_2O from before the start of industrialization (approximately 1750) to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of January 2025, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 426.65 ppm (NOAA 2025).

Regulatory Setting

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 ppm CO_2e concentration is required to keep global mean warming below two degrees Celsius (˚C), which in turn is assumed to be necessary to avoid dangerous climate change.

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. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

State

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code, Sections 38500–38599), which 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. AB 32 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.

Executive Order S-3-05. 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 (Cal/EPA) 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.

Senate Bill 32. Signed into law in September 2016, SB 32 codifies California's 2030 GHG reduction target of 40 percent below 1990 levels by 2030. The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

California Building Energy Efficiency Standards (Title 24). The 2022 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "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 Standards (CALGreen). 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 to meet the State's landmark initiative 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 (EV) 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.

CARB Scoping Plan. On December 11, 2008, CARB adopted its Scoping Plan, which functions as a roadmap to achieve the California GHG reductions required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California would implement to reduce the projected 2020 "Business-as-Usual" (BAU) emissions to 1990 levels, as required by AB 32. These strategies are intended to reduce carbon dioxide equivalent (CO_2e) emissions by 174 million metric tons. This reduction of 42 million $MTCO_2e$, or almost ten percent from 2002 to 2004 average emissions, would be required despite the population and economic growth forecasted through 2020.

CARB's Scoping Plan calculates 2020 BAU emissions as those 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 of the different economic sectors (e.g., transportation, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. When CARB's Scoping Plan process was initiated, 2004 was the most recent year for which actual data was available. The measures described in CARB's Scoping Plan were 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 updated 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 focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looked beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observed 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 in water, waste, natural resources, clean energy, transportation, and land use.

On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan, which identified the State's post-2020 reduction strategy. The Second Update was finalized in November 2017 and approved on December 14, 2017, and reflected the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. The 2017 Scoping Plan Update established a new Statewide emissions limit of 260 million $MTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

On December 15, 2022, CARB released the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan), 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 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 by 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 by 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 (NWL) 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.

Regional

Southern California Association of Governments (SCAG). On September 3, 2020, the Regional Council of the Southern California Association of Governments (SCAG) formally adopted the Connect SoCal: 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 from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specially, these strategies are to:

- 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, 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 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 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. These are articulated in a set of Regional Strategic Investments, Regional Planning Policies, and Implementation Strategies. The Regional Planning Policies are a resource for County Transportation Commissions (CTCs) and local jurisdictions, who can refer to specific policies to demonstrate alignment with the 2024-2050 RTP/SCS when seeking resources from state or federal programs. The Implementation Strategies articulate priorities for SCAG efforts in fulfilling or going beyond the Regional Planning Policies. 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

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 January 1, 2019, the SMMUSD School Board passed a Resolution to be exempted from the Sustainable City Plan from City of Santa Monica General Plan and zoning ordinance provisions. As such, the discussion of the City's General Plan, Sustainable City Plan, and Climate Action and Adaptation Plan is provided below as background information.

Santa Monica Climate Action and Adaptation Plan

The City's Climate Action and Adaptation Plan (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, and 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 CEQA process. As such, the CAAP was not utilized for consistency analysis.

Santa Monica General Plan Land Use and Circulation Element

The City's General Plan 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.

Santa Monica-Malibu Unified School District

Districtwide Plan for Sustainability

The District adopted the Districtwide Plan for Sustainability on March 21, 2019, which 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. In order to track and assess the District's progress toward sustainability over time, the District has documented baseline conditions in the Districtwide Plan for Sustainability and for each sustainability focus area (energy efficiency and renewables, water, solid waste, and transportation) has identified

performance indicators in the following: electrical consumption; natural gas consumption; energy use intensity; on-site solar production; percent on-site solar production; water used; total waste generation; diversion from landfill; drive alone rate; and staff average vehicle ridership. The performance indicators are applied across the District as a whole, which will allow the District to quantify the cumulative climate benefits of its sustainability program and will also provide the District with a mechanism for benchmarking against peers and aligning its goals with state, federal, and international climate goals. The Districtwide Plan for Sustainability identifies the goal for the District to adopt a Districtwide Climate Action Plan by 2025.

Thresholds of Significance

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 Section 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 Section 15064[h][3]) (CNRA 2009: 11-13, 14, 16). 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.[6]

Neither the District nor the City has adopted a numerical significance threshold for assessing impacts related to GHG emissions; however, the SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds in 2008. For the purposes of this analysis, the SCAQMD's proposed screening threshold of 3,000 $MTCO_2$ per year was used to determine the Proposed Project's impacts related to GHG emissions in combination with GHG plan consistency analysis. The methodology for evaluating the Proposed 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

[6] 14 California Code of Regulations Section 15064(h)(3).

the basis for determining the significance of the Proposed Project's GHG-related impacts on the environment.

Discussion of Impacts

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

***Less than Significant Impact*.** 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**.**

Proposed Project-Related Sources of Greenhouse Gases

Project-related GHG emissions would include emissions from construction activities, area sources, mobile sources, and refrigerants, while indirect sources would include emissions from energy consumption, water demand, and sold waste generation. As the Proposed Project would propose upgrades by demolishing old buildings, constructing new buildings, and/or renovating existing structures without increasing overall student enrollment, there would be no increase in mobile sources emissions over existing conditions during operation. The California Emissions Estimator Model version 2022.1 (CalEEMod) was utilized to calculate the Proposed Project's construction and operational GHG emissions; refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data. **Table 4.8-1** presents the estimated GHG emissions from all five construction phases of the Proposed Project.

TABLE 4.8-1 ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Total Construction Phase Emissions	Metric Tons Per Year[1,2]				
	CO_2	CH_4	N_2O	Refrigerants	CO_2e
Phase 1A	408.00	0.02	<0.01	0.05	411.00
Phase 1B	109.00	<0.01	<0.01	0.03	110.00
Phase 2	425.90	0.02	<0.01	0.09	429.90
Phase 3	346.50	0.01	<0.01	0.04	348.90
Phase 4	311.50	0.01	<0.01	0.02	313.50
Combined Construction Emissions	**1,600.90**	**0.06**	**<0.01**	**0.23**	**1,613.30**
Amortized over 30 years	**53.36**	**<0.01**	**<0.01**	**<0.01**	**53.78**

Source: Refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data for detailed model input/output data.
Notes:
1. Emissions calculated using California Emissions Estimator Model Version 2022.1 (CalEEMod) computer model.
2. Totals may be slightly off due to rounding.

As shown in **Table 4.8-1**, construction of the Proposed Project would result in a total of 1,613.30 $MTCO_2e$ per year. **Table 4.8-2** presents the estimated GHG emissions from the construction (amortized over 30 years) and operation of the Proposed Project.

TABLE 4.8-2 ESTIMATED GREENHOUSE GAS EMISSIONS

Source	Metric Tons Per Year[1,2]				
	CO_2	CH_4	N_2O	Refrigerants	CO_2e
Direct Emissions					
Construction (total of 1,613.30 $MTCO_2e$ amortized over 30 years)	53.36	<0.01	<0.01	<0.01	53.78
Area Source	0.59	<0.01	<0.01	-	0.60
Mobile Source	0.00	0.00	0.00	-	0.00
Refrigerants	-	-	-	0.02	0.02
Total Direct Emissions[2]	***53.95***	***<0.01***	***<0.01***	***0.02***	***54.40***
Indirect Emissions					
Energy	79.90	0.01	<0.01	-	80.10
Solid Waste Generation	3.40	0.34	0.00	-	11.90
Water Demand	1.66	0.03	<0.01	-	2.56
Total Indirect Emissions[2]	***84.96***	***0.38***	***<0.01***	***0.00***	***94.56***
Total Proposed Project-Related Emissions[2]	**148.96 MTCO2e/year**				
SCAQMD Screening Threshold	**3,000 MTCO2e/year**				
Exceed Thresholds?	**No**				

Source: Refer to Appendix A, Air Quality/Greenhouse Gas/Energy Data for detailed model input/output data.
Notes:
1. Emissions calculated using California Emissions Estimator Model Version 2020.4.0 (CalEEMod) computer model.
2. Totals may be slightly off due to rounding.

Direct Proposed Project-Related Sources of Greenhouse Gases

- *Construction Emissions.* Construction GHG emissions are typically summed and amortized over the lifetime of the Proposed Project (assumed to be 30 years), then added to the operational emissions.[7] As shown in **Table 4.8-1** and **Table 4.8-2**, the Proposed Project would result in 53.78 $MTCO_2e$ per year (amortized over 30 years), which represents a total of 1,613.30 $MTCO_2e$ from construction activities.
- *Area Source.*[8] Area source emissions were calculated using CalEEMod and Project-specific land use data. As a conservative analysis, the existing emissions are not deducted from the Proposed Project's emissions. Additionally, the enrollment would be same as the existing condition. As noted in **Table 4.8-2**, the Proposed Project would result in less than 0.60 $MTCO_2e$ per year of area source GHG emissions.
- *Mobile Source.*[9] As the Proposed Project would not change enrollment of the school, there would be no increase in mobile sources emissions over existing conditions during

[7] The Project lifetime is based on the standard 30-year assumption of the SCAQMD, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009.
[8] Area sources are defined by the SCAQMD as smaller sources of pollution (e.g., water heaters, gas furnaces, fireplaces, woodstoves, architectural coatings) that are typically associated with homes and non-industrial sources.
[9] Mobile sources are defined by SCAQMD as moving sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats and airplanes.

operation. As shown in **Table 4.8-2**, the Proposed Project would not directly result in mobile source-generated GHG emissions over the existing condition.

- *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 Global Warming Potential (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. As noted in **Table 4.8-2, t**he Proposed Project would directly result in 0.02 $MTCO_2e$/year from refrigerants.

Indirect Project-Related Source of Greenhouse Gases

- *Energy Consumption*. Energy consumption emissions were calculated using CalEEMod and project-specific land use data. Electricity would be provided to the campus by Southern California Edison (SCE). As shown in **Table 4.8-2**, the Proposed Project would indirectly result in 80.10 $MTCO_2e$ per year due to energy consumption.
- *Solid Waste*. Solid waste associated with operations of the Proposed Project would result in 11.90 $MTCO_2e$ per year; refer to **Table 4.8-**2**.**
- *Water Demand*. The Proposed Project's operations would result in a demand of approximately 849,204 gallons of water per year. Emissions from indirect energy impacts due to water supply would result in 2.56 $MTCO_2e$ per year; refer to **Table 4.8-1**.

Total Project-Related Sources of Greenhouse Gases

As shown in **Table 4.8-1**, the amount of Proposed Project-related GHG emissions from direct and indirect sources combined would total 148.96 $MTCO_2e$ per year. Therefore, the Proposed Project's GHG emissions would not exceed the SCAQMD screening threshold of 3,000 $MTCO_2e$ per year, and impacts would be less than significant.

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

***Less than Significant Impact*.** The following discussion focuses on the Proposed Project's consistency with SCAG's 2020-2045 RTP/SCS and CARB's 2022 Scoping Plan. The District's Districtwide Plan for Sustainability (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 4.6, Energy.

Proposed Project's Consistency with the SCAG 2020-2045 RTP/SCS

As mentioned above, the latest 2024-2050 RTP/SCS (Connect SoCal 2024) was adopted on April 4, 2024. However, CARB concluded that the technical methodology SCAG used to quantify the

GHG emission reductions for the Connect SoCal 2024 does not operate accurately (CARB 2024b). SCAG resubmitted the Sustainable Communities Strategy (SCS) Submittal Package for CARB's review in June 2024. Review by CARB is limited to acceptance or rejection of SCAG's determination that its SCS would, if implemented, achieve the region's GHG emission reduction target. If CARB rejects SCAG's determination of meeting the GHG emission target, SCAG would need to revise the SCS or adopt an alternative planning strategy demonstrating the ability to achieve the target. As such, until CARB makes the decision, Connect SoCal 2024 is not a fully adopted document and is potentially subject to further updates, especially from the GHG reduction perspective of the methods and assumptions of the calculation of Auto Operating Costs (AOC),[10] induced travel, electric vehicle incentives, job center parking and parking deregulation, off-model strategy assumptions, and emissions factors. As CARB has not made the decision at the time of preparation of this document, the consistency analysis relies upon the 2020-2045 RTP/SCS. **Table 4.8-2** demonstrates that the Proposed Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

TABLE 4.8-3 PROJECT CONSISTENCY WITH 2020-2045 RTP/SCS

Reduction Strategy	Proposed Project's Consistency Analysis
Focus Growth near Destinations and Mobility Options	
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent**. As part of the City of Santa Monica's Safe Routes to School (SRTS) Program, a number of pedestrian improvements (i.e., curb extensions, rebuilding of curb ramps, crosswalk removal, and refreshed traffic striping) were recently undertaken on several roadways and intersections within the vicinity of Franklin Elementary School.[1] Construction of these improvements commenced in November 2024; refer also to Section 4.17, Transportation. The SRTS Program is aimed at enhancing pedestrian safety within school zones for those who use such routes regularly. Additionally, the Proposed Project would add and utilize existing mobility features that would encourage a more diverse multimodal integration. Such proposed and existing features include bicycle parking, school bus use, and sidewalk improvements. As such, the Proposed Project would be consistent with this reduction strategy.
• 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.	**Consistent.** The Proposed Project is not a residential development and as such, would not increase regional housing supply. Additionally, the Proposed Project would not result in enrollment increase and therefore would not require new jobs. Additionally, the Proposed Project is located along Montana Avenue which has a bus

[10] AOC is used as key variable across several major model components of the travel demand model, such as vehicle ownership, destination choice, and mode choice. This parameter represents the expenses associated with the usage of vehicles, expressed in cents per mile or dollar per mile. AOC plays a pivotal role as a fundamental parameter within the travel demand model.

TABLE 4.8-3, CONTINUED

Reduction Strategy	Proposed Project's Consistency Analysis
	line serviced by Big Blue Bus. As such, the Proposed Project would be consistent with this reduction strategy.
• Plan for growth near transit investments and support implementation of first/last mile strategies.	**Not Applicable.** This strategy focuses on SCAG's support on new development near existing transportation investments. The Proposed Project is not a new development.
• Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	**Not Applicable.** The Proposed Project is not a retail or nonresidential development and as such, this strategy would not be applicable.
• Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	**Not Applicable.** The Proposed Project would not redevelop underutilize land. However, it should be noted that the Proposed Project would result in more amenities and classrooms for Franklin Elementary School.
• 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).	**Consistent.** As discussed, the Proposed Project would not result in an increase in daily trips to the site. Nevertheless, the Proposed Project would include features that would reduce solo car trips such as providing improved pedestrian access, vanpool parking spots, and bicycle parking spots. No net loss of bicycle parking on-site would occur with the Proposed Project; a total of 52 bicycle parking spaces would be provided at Proposed Project buildout to encourage students to bike to school. As such, the Proposed Project is consistent with this reduction strategy.
• Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	**Consistent.** The Proposed Project would demolish the existing surface parking lot in order to construct a new surface parking lot with 37 spaces. As such, the Proposed Project would construct more parking spaces while not affect existing traffic volumes. As such, the Proposed Project is consistent with this reduction strategy.
Promote Diverse Housing Choices	
• Preserve and rehabilitate affordable housing and prevent displacement.	**Not Applicable.** The Proposed Project is not a housing project. As such, this strategy would not be applicable.
• Identify funding opportunities for new workforce and affordable housing development.	**Not Applicable.** This strategy only pertains to governmental agencies and would not be applicable to development projects. As such, this strategy would not be applicable.
• Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply.	**Not Applicable**. The Proposed Project does not include accessory dwelling units. As such, this strategy is not applicable.

TABLE 4.8-3, CONTINUED

Reduction Strategy	Proposed Project's 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.	**Consistent**. The Proposed Project would install electric vehicle charging stations which would encourage clean energy vehicles. Additionally, the Proposed Project would promote bicycle and bus use as an alternative mode of transportation. Thus, the Proposed Project would be consistent with this reduction strategy.
• 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.	**Not Applicable.** This strategy focuses on SCAG's support on technology which may reduce VMT or allow for easier access to transportation options.
• Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**Not Applicable.** This strategy focuses on SCAG's support on promoting "micro-power grids."
Support Implementation of Sustainability Policies	
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions .	**Not Applicable.** This strategy focuses on SCAG's support on sustainable developments.
• Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	**Not Applicable.** This strategy focuses on SCAG's support on statewide legislation.
• 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.	**Not Applicable.** This strategy focuses on SCAG's support on statewide legislation.
• Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies.	**Consistent.** The Proposed Project would work alongside the City, the District, and SCE in implementing required sustainability programs and/or optional rebate programs. As such, the Proposed Project is consistent with this strategy.
• Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**Not Applicable.** This strategy focuses on SCAG's support with local planning organizations.
• Continue to support long range planning efforts by local jurisdictions.	**Not Applicable.** This strategy focuses on SCAG's support with local planning organizations.

TABLE 4.8-3, CONTINUED

Reduction Strategy	Proposed Project's 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.	**Not Applicable.** This strategy focuses on SCAG's support with local planning organizations.
• Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Consistent.** As discussed above, the Proposed Project would have a solar ready roof for the future installation of photovoltaic panels for on-site renewable energy production. The Proposed Project is part of the Clean Energy Alliance which would utilize 100 percent renewable energy. Additionally, the Proposed Project would include landscaping which would reduce the urban heat island effect. As such, the Proposed Project is consistent with this strategy.
• Integrate local food production into the regional landscape.	**Not Applicable.** This strategy focuses on incorporation of food production (community gardens).
• Promote more resource efficient development focused on conservation, recycling and reclamation.	**Not Applicable.** The Proposed Project is located within an urbanized and built environment.
• Preserve, enhance and restore regional wildlife connectivity.	**Not Applicable.** The Proposed Project is located within an urbanized and built environment that does not contribute to regional wildlife connectivity.
• Reduce consumption of resource areas, including agricultural land. Identify ways to improve access to public park space.	**Not Applicable.** The Proposed Project is not located on resource areas or agricultural land. This strategy focuses on SCAG's cooperation with local agencies in supporting accessibility public parks.

Source: SCAG 2020.
Notes:
1. City of Santa Monica, Pedestrian Improvements at Six Schools. n.d. https://www.santamonicaca.gov/mobility-projects/pedestrian-improvements-at-six-schools. Accessed February 26, 2025.

Proposed Project's 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 4.8-4** provides 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 4.8-4 PROPOSED PROJECT'S CONSISTENCY WITH THE 2022 SCOPING PLAN

Actions and Strategies	Proposed Project's Consistency Analysis
Smart Growth/Vehicle Miles Traveled (VMT)	
Reduce VMT per capita to 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.	**Consistent**. The Proposed Project would not result in an increase in existing trips. Additionally, the proposed project would include features that would encourage modes of transportation that would reduce overall VMT per capita. Such features include vanpool and carpool parking, short- and long-term bicycle parking, and usage of public transportation (buses). As such, the project is consistent with this action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed Statewide by 2030.	**Consistent**. The City of Santa Monica and the District has not adopted an ordinance or program requiring the use of all electric appliances in new developments. Additionally, the City also does not have any regulation that requires an all-electric development. However, if regulations related to all electric development are adopted in the future, the Proposed Project would comply with such regulations. As such, the Proposed Project would be consistent with this action.
Construction Equipment	
Achieve 25 percent of energy demand electrified by 2030 and 75 percent electrified by 2045.	**Consistent**. The City of Santa Monica and the District has not adopted an ordinance or program requiring electricity-powered construction equipment. However, if adopted, the Proposed Project would be required to comply with such regulation. As such, the Proposed Project would be consistent with this action.
Non-Combustion Methane	
Divert 75 percent of organic waste from landfills by 2025.	**Consistent**. SB 1383 establishes targets to achieve a 50-percent reduction in the level of Statewide organic waste disposal from 2014 levels 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 is recovered for human consumption by 2025. The Proposed Project would comply with local and regional regulations and recycle or compost 75 percent of waste by 2025 pursuant to SB 1383. As such, the Proposed Project would be consistent with this action.

Source: CARB 2022.

Conclusion

In summary, the plan consistency analyses provided above demonstrate that the Proposed Project complies with, or exceeds, the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2020-2045 RTP/SCS and the 2022 Scoping Plan. Thus, the Proposed Project's incremental increase in GHG emissions, as described above, would not result in a significant impact on the environment. The Proposed Project's impacts with regard to climate change would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☒	☐
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

This section is based, in part, on the Phase I Environmental Site Assessment (ESA) prepared for the Proposed Project by Alta Environmental DBA NV5, dated April 2022, and included as Appendix D. Other evaluations have been prepared for the Proposed Project, which are on file at the SMMUSD Facility Improvement Projects Office located at 2828 4th Street, Santa Monica, CA 90405, and are available for public viewing. These include the following:

- Hazardous Materials Survey Report - Franklin Elementary School, Building G and Grounds Demolition Project, prepared by NV5, Inc., October 2024.
- Hazardous Materials Abatement Specification - Franklin Elementary School, Building G, prepared by NV5, Inc., October 2024.

Overview

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

> *A "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.*
>
> *"Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.*

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

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

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

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

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

The City of Santa Monica General Plan Safety Element (Santa Monica 1995) establishes the City's goals, policies, and programs to reduce hazards from the natural and build environment including from those related to hazardous materials and waste and airport hazards. With respect to the Proposed Project, the Safety Element includes Policy 5.1, which states that "The use, storage, and transportation of toxic, explosive, and other hazardous and extremely hazardous materials shall be strictly controlled to prevent unauthorized discharges." The City also maintains a Local Hazard Mitigation Plan that identifies local disaster hazards, assesses the possibility of these hazards occurring, and identifies actions to mitigate disaster losses. The City is also in the process of updating its Safety Element and Local Hazard Mitigation Plan. As of December 2024, the Draft Safety Element is planned to be presented for recommendation to City Council for adoption.

Additionally, the Santa Monica Police Department has prepared Policy 202.1, Emergency Management Plan for use in the event of a major disaster or other emergency event.

A Phase I ESA was prepared by Alta Environmental DBA NV5 to evaluate the Proposed Project's site for potentially harmful hazardous materials; refer to Appendix D. A Tier 1 vapor encroachment screening (VES) was completed at the Proposed Project's site to evaluate for the potential for a vapor encroachment condition (VEC), which is the presence or likely presence of chemical of concern vapors in subsurface soils caused by the release of vapors from contaminated soil or groundwater on or near the site. The VES did not identify evidence of a potential VEC in connection with the site. In addition, the Phase I ESA concluded that there is no evidence of a recognized environmental condition (REC), controlled REC, or historic REC in connection with the Proposed Project's site. However, based on the age of historical and current structures on the site, arsenic, lead-based paint (LBP), asbestos containing material (ACM), pesticides, and polychlorinated biphenyls (PCBs) in caulking may have been historically used at the site. As a result, there is a potential for these compounds to be present in the shallow soils on-site. Refer to the discussion below for further analysis.

Discussion of Impacts

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

***Less than Significant Impact*.** Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners, would be routinely used on the Proposed Project's site. However, all potentially hazardous materials used during construction would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Proposed Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including but not limited to the Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts (OSHA), SCAQMD rules, and permits and associated conditions issued by the Santa Monica Building and Safety Division. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, the Proposed Project's construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Schools do not generate significant amounts of hazardous materials, and only minimal amounts of common day-to-day materials are stored on-site, such as those materials used in routine cleaning of buildings or maintenance of landscaping equipment. These materials would be used, stored, and disposed of in accordance with existing regulations and product labeling and would

not create a significant hazard to the public or to the environment. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Proposed Project would be less than significant.

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

***Less than Significant Impact with Mitigation Incorporated*.** As discussed in Response 4.9-a above, the Proposed Project would not result in the routine transport, use, or disposal, of any hazardous materials that would create a significant hazard to the public or the environment. In addition, as provided in the Phase I ESA, there is no evidence of underground or aboveground storage tanks within the campus, and no oil/gas wells are within the campus or adjoining properties.

Based on the age of historical and current structures on the campus, there is the potential that there may be hazardous materials present, consisting of arsenic (from building materials), lead (from LBP), asbestos (from building materials), pesticides (from prior termite treatment), and PCBs (in window caulking) (Alta Environmental DBA NV5 2022). According to the DTSC Hazardous Waste Tracking System (HWTS) HAZNET database, the existing school disposed of 6.7 tons of asbestos containing waste in 1984 and 8.4 tons of asbestos containing waste in 1994 (Alta Environmental DBA NV5 2022). Additionally, on October 2, 2024, NV5 conducted a hazardous building materials survey at Building G and on grounds in the vicinity and confirmed the presence of LBP and ACMs (NV5 2024). These and other compounds may be present in the shallow soils on-site, and based on their properties, do not have the tendency to migrate.

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 confirmed 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 measure **HAZ-1.**

As concluded in the Phase I ESA, it is recommended that a limited Phase II subsurface investigation be conducted in areas of proposed soil disturbance to evaluate shallow soil conditions with respect to the chemicals of concern listed above. Thus, the Proposed Project shall implement mitigation measure **HAZ-2** which would require preparation of a Phase II subsurface investigation, followed by remediation as applicable based on the results of the Phase II investigation. As the hazardous materials may be present in shallow soils, the remediation activities are expected to consist of removing the affected soils and hauling to an appropriate landfill. With implementation

of such mitigation, potential impacts related to the release of hazardous materials into the environment during the Proposed Project's construction activities would be less than significant.

As described above, the Phase I ESA also included a VES to evaluate the potential for vapor encroachment of chemicals of concern onto the campus, and to determine if such vapor encroachment constitutes evidence of a REC on the site. The VES Standard Guide requires the environmental professional to search for potential sites of concern within specific search radii—1,760 feet (1/3 mile) for non-petroleum-contaminated sites and 528 feet (1/10 mile) for petroleum-contaminated sites. The Phase I ESA identified several sites of potential concern within the VES search radii, based on review of governmental database records, regulatory agency files, and historical data sources (further detailed in Response 4.9-d below). However, based on review of available information, none of the sites appear to represent a VEC in connection with the campus. No impact would occur in this regard.

Mitigation Measure:

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 encountered, 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 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.

HAZ-2 Prior to any soil-disturbing construction activities on-site, a limited Phase II subsurface investigation shall be performed within areas of suspected of potential contamination to determine the presence of chemicals of concern in the campus. 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 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.

Level of Significance: Less than significant with mitigation incorporated.

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

***Less than Significant Impact with Mitigation Incorporated*.** The Proposed Project's site is located on an existing elementary school campus. None of the proposed uses would emit any hazardous emissions. A small amount of common household hazardous materials may be stored in a janitorial storeroom, including cleaning solutions, bleach, and automotive lubricants. As detailed in the Phase I ESA and addressed in Response 4.9-d below, according to the DTSC HAZNET database, the existing school disposed of the following: 6.7 tons of asbestos containing waste in 1984; 8.4 tons of asbestos containing waste in 1994; 0.15 tons of aqueous solution with total organic residues less than 10 percent in 2013; and 0.12 tons of PCB material in 2019 (Alta Environmental DBA NV5 2022). Nonetheless, the USEPA Facility Index System/Facility Registry System (FINDS) database and RCRA NonGen/NLR database indicate that the existing site is not listed as a handler of nonhazardous or hazardous waste. Operation of the Proposed Project would not result in significant emitted hazardous emissions or handling of hazardous materials, substances, or waste.

As previously discussed, based on the age of historical and current structures on the site, arsenic, asbestos, pesticides, and PCBs in caulking may have been historically used at the site, and recent evaluations on-site have confirmed the presence of ACMs and LBPs (NV5 2024). As a result, there is a potential for these compounds to be present in the shallow soils on-site. The Proposed Project shall implement mitigation measures **HAZ-1** and **HAZ-2** and adhere to the resultant

recommendations in order to reduce potential impacts related to the handling of hazardous materials during construction activities to a less than significant level.

Mitigation Measures: See **HAZ-1** and **HAZ-2**, above.

Level of Significance: Less than significant with mitigation incorporated.

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

Less than Significant Impact. Section 65962.5 of the Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies.

As part of the Phase I ESA, agency database lists were reviewed for known or suspected contaminated sites and for sites that store, generate, or use hazardous materials near the subject property. Based on the database search, the Proposed Project's site was listed on the USEPA Enforcement and Compliance History Online database; however, no violations are reported. According to four listings on the DTSC HAZNET database, the existing school disposed of the following: 6.7 tons of asbestos containing waste in 1984; 8.4 tons of asbestos containing waste in 1994; 0.15 tons of aqueous solution with total organic residues less than 10 percent in 2013; and 0.12 tons of PCB material in 2019 (Alta Environmental DBA NV5 2022). The USEPA FINDS database and RCRA NonGen/NLR database indicate that the campus is not listed as a handler of nonhazardous or hazardous waste. In addition, no records of the existing site were identified by the RWQCB's Geotracker database, DTSC's EnviroStor, and Santa Monica Fire Department records (SWRCB 2024).

Near the northeastern portion of the campus and across 25th Street is the site of 2502 Montana Avenue, which operated as an automobile service and gasoline station from 1928 to 1972, according to the Environmental Database Report Historical Auto Stations database. According to the Santa Monica Fire Department records, all underground storage tanks were removed from this property in 1974, and the site was redeveloped into a multifamily residential apartment building. As concluded in the Phase I ESA, based on the removal of the tanks, separation distance, and local depth to groundwater, this listing is not considered to represent an REC with respect to the campus.

Based on the above, the Proposed Project would not create significant hazard to the public or the environment, and such impacts would be less than significant.

4.9-e For a Project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

***Less than Significant Impact*.** The campus is located approximately 2.2 miles northwest of the Santa Monica Municipal Airport located at 3223 Donald Douglas Loop South. The Santa Monica Municipal Airport is governed by Santa Monica Municipal Code Chapter 10.04 (Municipal Airport), also referred to as the Santa Monica Airport Code, and the Los Angeles County Airport Land Use Plan, which was developed by the Los Angeles County Department of Regional Planning/Los Angeles County Airport Land Use Commission (ALUC). This latter document is intended to provide for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations and to protect the municipal environment from the effects of aircraft noise. Potential land use development is to be judged compatible with the airport based on criteria set forth in the ALUC Procedural Policies contained in the ALUC document.

According to the Los Angeles County Airport Land Use Plan, the campus is not located within the Santa Monica Airport Influence Area (Los Angeles County ALUC 2004). Federal Aviation Regulations (FAR) Part 77 establishes standards and notification requirements for objects affecting navigable airspace. CFR Title 14 Part 77.13 requires that any applicant who intends to perform any construction or alterations to structures that exceed 200 feet in height above ground level must notify the Federal Aviation Administration for that project's approval. The Proposed Project does not include high-rise structures in the proximity of the airport airway that would conflict with FAR Part 77 regulations. As a result, the Project would not result in safety hazards for people residing or working in the area.

Additionally, as the campus is not located within the boundaries of the Airport Influence Area, nor any noise contours for the airport, occupants of the Proposed Project would not be exposed to excessive noise from airport operations. The Proposed Project features improvements to the existing on-site school facilities; no new land use is proposed, and no increase in occupancy or student enrollment would result. Therefore, the Proposed Project would not result in the exposure of occupants of the site to increased safety hazards or noise relative to airport operations. A less than significant impact would occur.

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

No Impact. Phase 1 of the Proposed Project's construction includes the addition of a fire truck turn lane and installation of a fire water line to reach the central portion of the campus. The Proposed Project would necessitate an update to the school evacuation plan as a result of the modifications and construction on the campus. The Proposed Project would conform to the applicable City of Santa Monica General Plan Safety Element policy and Local Hazard Mitigation Plan with the storage, use, and transportation of hazardous materials used during construction. The Proposed Project would be in compliance with Fire Department codes and policies and would comply with California Senate Bill 187 requirements for Comprehensive School Safety Plans. All

campus plans, including the location of all buildings, fences, driveway gates, retaining walls, and other construction potentially affecting Fire Department access would be subject to approval by the state Fire Marshal.

The Proposed Project would also not interfere with the Santa Monica Police Department Policy 202.1, Emergency Management Plan. The Proposed Project would not affect the conditions of the nearest disaster routes, which include San Vicente Boulevard (0.7 miles to the north), Santa Monica Boulevard (0.7 miles to the south), Santa Monica Freeway I-10 (1.3 miles to the south), and San Diego Freeway 405 (2.1 miles to the east) (Los Angeles County Department of Public Works n.d.). Therefore, the Proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and no impacts would occur.

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

***No Impact*.** The campus is in a fully built-out urbanized environment. The campus is not identified by the California Department of Forestry and Fire Protection (CalFire) as being in a fire hazard severity zone or in a state responsibility area (CalFire n.d.). Therefore, there would be no impact regarding exposure of people to wildland fire hazards as a result of the Proposed Project's implementation.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY. Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or,	☐	☐	☒	☐
iv) impede or redirect flood flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Overview

The Proposed Project's school site is located in the Santa Monica Plain, an uplifted and inclined alluvial surface within the southwestern block of the Los Angeles Basin. The Proposed Project's site is mapped within the United States Geological Survey (USGS) 7.5-Minute Beverly Hills Quadrangle, which shows the Project school campus to be relative flat with an approximate elevation of ±255 to +265 feet above mean sea level (amsl) (Verdantas 2025; see Appendix C). The Federal Emergency Management Agency (FEMA) has prepared a Flood Insurance Rate Map (FIRM) depicting flood hazard areas in Los Angeles County. According to FEMA, no portion of the Proposed Project's site is located within a 100-year floodplain (Flood Map 06037C1590G); the school campus is located in Zone X, an Area of Minimal Flood Hazard (FEMA 2024). The Proposed Project's area is within the jurisdictional boundaries of the Los Angeles RWQCB, one of nine regional boards in the state. The Los Angeles RWQCB protects ground and surface water quality in the Los Angeles region, including the coastal watersheds of Los Angeles and Ventura Counties, along

with very small portions of Kern and Santa Barbara Counties. Specifically, the RWQCB identifies potential water quality problems, confirms and characterizes water quality problems through assessments, remedies problems through imposing or enforcing appropriate measures, and monitors problem areas to assess effectiveness of remedial measures. Remedies for problems include prevention and cleanup. Common means of prevention are the issuance of National Pollutant Discharge Elimination System (NPDES) permits, waste discharge requirements, and discharge prohibitions and restrictions. Cleanup is implemented through enforcement measures such as Cease and Desist Orders and Cleanup and Abatement Orders.

The campus is located within the City of Santa Monica's water service area (Santa Monica 2021a). The City supplies potable water through a combination of local groundwater from the Santa Monica Groundwater Basin and water purchased from the Metropolitan Water District of Southern California (MWD) that is imported from the Colorado River or State Water Project. A small amount of non-potable water (less than 1 percent of the total water supply) is available to the City from the City's Santa Monica Urban Runoff Recycling Facility, which provides non-potable water for uses such as irrigation, toilet flushing, and street sweeping.

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

Discussion of Impacts

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

***Less than Significant Impact*.** The Proposed Project entails the phased demolition and construction of structures and outdoor spaces and substantial portions of the school campus. During construction, there is potential for the Proposed Project to result in degradation of water quality due to use of routine hazardous materials such as vehicle and equipment fuels, lubricants, greases, and oils; erosion and sedimentation, and release of debris during earth disturbance and demolition activities; and paints and coatings in building. As discussed in Section 4.9, Hazards and Hazardous Materials, construction of the Proposed Project would not create a significant hazard through the transport, use, or disposal of hazardous materials. The Proposed Project is subject to compliance with SMMC Chapter 7.10, Urban Runoff Pollution and Low Impact Development, which the Los Angeles RWQCB has deemed to provide equivalent if not greater water quality benefits than those derived from implementation of the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit (Order No. R4-2012-0175-A01), for which the City is also a co-permittee. As such, construction-related activities would be subject to mandates of the Los

Angeles RWQCB, which would prevent a violation of water quality standards, waste discharge requirements, and would prevent water quality degradation.

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

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

Further, the Standard Urban Stormwater Mitigation Plan (SUSMP), NPDES General Construction Permit, and Los Angeles County MS4 permit require that a project not increase stormwater flows from a site during operations. The Proposed Project has been designed such that stormwater flows generated would be managed on-site to ensure that an increase in volumes or rates above existing conditions does not result with the Proposed Project's implementation. Such design methods would reduce the potential for the Proposed Project to contribute to the degradation of downstream waters over the life of the proposed campus improvements.

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

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

Less than Significant Impact. The City of Santa Monica, and the campus, lie within the Santa Monica Groundwater Basin, which is a subbasin of the Los Angeles Plain Groundwater Basin (DWR Basin 4-011.01). The City currently relies on groundwater to supplement its water supply. From 2016 to 2020, approximately 65 percent of the water supply was from local water resources and

35 percent was imported. An estimated 64 percent of the City's water supply during this time period was from groundwater; 35 percent was provided by MWD; and 1 percent was from recycled water sources (City of Santa Monica 2021a).

The Proposed Project is located within an established educational campus. While there may be new landscaped or turf areas on-site requiring additional watering following the Proposed Project's completion, the District implements a water conservation program that includes upholding an agreement with the City to reduce water consumption by 2 million gallons per year to support the City's 20 percent water reduction goal (SMMUSD 2019). The District currently implements water conservation efforts at Franklin Elementary School by utilizing water monitoring software and smart (weather-based) irrigation controllers to track real-time water consumption, performance, and water system operations. Additionally, it is anticipated that resurfacing of the existing natural turf playfield during Phase 1 may involve installation of artificial turf, which would reduce the amount of water needed for field irrigation, as has been previously demonstrated at the District's Lincoln Middle School (SMMUSD 2019). Recycled water is not currently used at the Franklin Elementary School site for landscaping irrigation purposes, nor is the use of such resources proposed with the new campus improvements. With incorporation of the school's active water conservation practices and design, in accordance with the District's agreement with the City, the Proposed Project would not substantially increase groundwater demand or otherwise deplete area groundwater supplies.

Although potential use of artificial turf with the proposed playfield improvements would decrease direct infiltration of on-site stormwater into the underlying substrate, as compared to existing conditions, with implementation of BMPs that would improve infiltration, including using of biofiltration and bioswales, it is anticipated that the volume of stormwater infiltration would be maintained. As discussed above, the Proposed Project would be subject to conformance with local and state requirements pertaining to the regulation of on-site stormwater flows to ensure that the Proposed Project does not result in degradation in the quality of downstream waters or groundwater supplies, or otherwise affect overall groundwater management within the basin.

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

In accordance with Section 7.10.050(b), the City requires that new development prepare an Urban Runoff Mitigation Plan. The Plan is intended to identify design measures to infiltrate or treat projected runoff by an amount equal to (or greater than) the volume of runoff produced from a storm event. Suh design measures may include: 1) maximizing permeable areas to increase percolation of runoff through biofilters, green strips, and/or swales, and encouraging use of permeable materials in lieu of (or to replace) hardscapes; 2) maximizing the amount of runoff directed to on-site permeable areas and/or maximizing stormwater storage for reuse or

infiltration through roof runoff toward permeable surfaces, drywells, French drains, or other structural BMPs; grading to divert flow to permeable areas; use of cisterns, retention structures, or green rooftops to store precipitation or runoff for reuse; or removing or designing curbs or berms to avoid isolation of permeable or landscaped areas; or 3) removing pollutants through installation of treatment control BMPs.

Alternatively, a waiver from the requirement to provide a design that infiltrates or treats projected runoff for new development by an amount equal to or greater than the volume of runoff produced from a storm event (SMMC section 7.10.050[b]) may be issued by the City of Santa Monica Director of the Department of Environmental and Public Works Management if it can be demonstrated that implementing such requirements is impractical. Recognized circumstances may include where the following conditions occur: extreme limitations of space for treatment; unfavorable or unstable soil conditions at a site to attempt infiltration; or risk of groundwater contamination because a known unconfined aquifer lies beneath the land surface or an existing or potential underground source of drinking water is less than 10 feet from the soil surface. If a waiver is granted, the applicant is required to transfer the savings in cost, as determined by the Director, to a City stormwater mitigation fund to be used to promote regional or alternative solutions for urban runoff pollution in the storm watershed. The mitigation fund may be operated by a public agency or a nonprofit entity (SMMC section 7.10.050[h]).

Existing soils on the Proposed Project's site consist of undocumented artificial fill (dark brown to reddish brown sandy lean clay to silty clay with varying amounts of salty gravel) and Quaternary old alluvial fan deposits (brown, dark grayish brown, and reddish brown silty clay and sandy clay locally channelized with sand and salty gravels, ranging from very stiff to hard and medium dense to very dense) (Verdantas 2025). Due to their composition, the alluvial fan deposits are anticipated to have a low infiltration rate. As such, the District may opt to request a waiver, allowing for calculation of the average runoff from the site and instead making payment of in-lieu-of fees to meet the City's stated groundwater protection requirements.

Whether through engineering design methods or payment of in-lieu-of fees, the Proposed Project would conform to the City's requirements to ensure that groundwater recharge is not adversely affected over the life of the Proposed Project. With the Proposed Project's conformance to such local regulations, the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the Proposed Project would impede sustainable groundwater management of the basin. Impacts would be reduced to less than significant, and no mitigation is required.

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

i) result in substantial erosion or siltation on- or off-site;

***Less than Significant Impact*.** Refer also to the discussion under 4.10-b, above, regarding the addition of impervious surfaces on-site and controls for stormwater runoff. Currently, the campus is fully developed and does not contain any natural surface water features. Implementation of the

Proposed Project may alter the existing drainage patterns on the site during construction during earthwork activities, and during operations by adding hardscapes which currently do not exist. However, the District would be required to prepare and implement a SWPPP for construction related drainage, to comply with the RWQCB's General Construction Stormwater Permit and comply with SMMC Chapter 7.10, Urban Runoff Pollution and Low Impact Development. The SWPPP and SMMC Chapter 7.10 will identify BMPs to be implemented on the Proposed Project's site to minimize soil erosion and protect existing drainage systems.

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

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than Significant Impact. The campus does not contain any surface water features; however, implementation of the Proposed Project would alter existing drainage patterns and increase impervious surfaces. However, as mentioned, the Proposed Project would also be designed in accordance with the applicable California Building Code and California Green Building Standards Code, which prohibit an increase or concentration of post-construction runoff; and SMMC Chapter 7.10, which includes implementation of LID design and preparation of an Urban Runoff Mitigation Plan, to demonstrate that the projected runoff from the site is reduced by at least a volume equivalent to the impermeable surfaces times 0.75. The Proposed Project design would be reviewed and approved as part of the required construction and building permits. Compliance with existing state and local regulations would reduce potential impacts during construction or operations to a less than significant level.

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

***Less than Significant Impact*.** See also discussion under 4.10-a and 4.10-c in this subsection. Under existing conditions, the school campus is developed with hardscape surfaces that influence infiltration and affect stormwater runoff from the site. Stormwater from the site currently is accommodated by connection to the City's public stormwater drainage system. Implementation of the Proposed Project would alter existing drainage patterns on-site and increase impervious

surfaces that could have the potential to concentrate and increase runoff and exceed the existing stormwater drainage system capacity.

As discussed above, the Proposed Project would be designed in accordance with the 2022 California Building Code, 2022 California Green Building Standards Code, and SMMC Chapter 7.10, and would require LID design measures and preparation of an Urban Runoff Mitigation Plan. The Proposed Project would incorporate engineering design methods and BMPs consistent with state and local standards and regulations to ensure that runoff from the campus would not substantially increase in rate or volume compared to existing conditions. As such, development of the campus as planned would not contribute increased amounts of runoff to the City's existing stormwater drainage system in a manner that would exceed capacity over short- or long-term operations. The City's existing stormwater system is expected to be adequate to accommodate stormwater runoff from the subject site, and expansion of existing City drainage facilities to serve the Proposed Project is not necessary or proposed.

Redevelopment of the campus could generate polluted runoff that includes sediment from soil disturbances; oil and grease from construction equipment, roadways, and parking lots; pesticides and fertilizers from landscaped areas; metals, paints, and hazardous materials from building demolition; and/or construction debris and trash. As discussed above, potential pollutants and runoff from the Proposed Project's construction and operation activities would be managed with implementation of the Proposed Project's SWPPP, Urban Runoff Mitigation Plan, and required practices identified in SMMC Chapter 7.10. As a result, compliance with existing regulations developed to reduce surface and polluted runoff would reduce this impact during construction and operations to a less than significant level.

iv) impede or redirect flood flows?

Less than Significant Impact. As discussed above, the Proposed Project's drainage would be designed in accordance with the 2019 and/or 2022 California Building Code, 2022 California Green Building Standards Code, and SMMC Chapter 7.10. The Proposed Project would be designed to maintain the existing surface flow characteristics and reduce runoff in accordance with LID design requirements and measures identified in the Urban Runoff Mitigation Plan prepared for the Proposed Project. As a result, compliance with existing state and local regulations would reduce this impact during construction and operations to a less than significant level.

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

No Impact. The campus is located approximately 2 miles from the Pacific Ocean. Additionally, according to tsunami inundation maps for the Santa Monica area produced by the CDOC, the Proposed Project's site is not located within a Tsunami Hazard Area or in an area affected by a seiche (CDOC 2024c). Additionally, the topography of the Proposed Project's site is essentially flat and is not at risk of mudflows. Implementation of the Proposed Project would not result in any impacts related to seiche, tsunami, or mudflow.

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

Less than Significant Impact. Refer also to discussion under 4.10-a and 4.10-b, above. The Proposed Project would be designed to be consistent with the Statewide NPDES General Construction Permit and the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit (Order No. R4-2012-0175-A01) for water quality control, for both construction and site improvements.

As mentioned above, the City's water supply is composed of approximately 60-70 percent groundwater, which is produced from the Santa Monica Groundwater Basin, which is a subbasin of the Los Angeles Plain Groundwater Basin (DWR Basin 4-011.01). The Santa Monica Groundwater Basin is not adjudicated and is managed by the Santa Monica Basin Groundwater Sustainability Agency (GSA), which comprises the City of Santa Monica, City of Los Angeles Department of Water and Power, City of Culver City, City of Beverly Hills, and the County of Los Angeles. The Santa Monica Groundwater Basin is considered a medium-priority groundwater basin; therefore, preparation of the *Groundwater Sustainability Plan for the Santa Monica Groundwater Subbasin* (GSA 2022) was required. The purpose of the Groundwater Sustainability Plan is to define the groundwater conditions that will be used to ensure the long-term sustainability of groundwater resources for current and future uses. Historically, the primary inflows have been mountain front recharge from the Santa Monica Mountains and precipitation. Historical estimates for the sustainable yield (or maximum quantity of groundwater, calculated over a base period representative of long-term conditions and including any temporary surplus that can be withdrawn annually from a groundwater supply without causing an undesirable result) of the subbasin range from 10,800 AFY to 19,700 AFY. Currently, no undesirable results related to groundwater extraction have been observed in the Silverado aquifer, which is the primary source of groundwater in the subbasin.

As mentioned above, the campus is an established school campus and the Proposed Project does not involve an increase of student population. While there may be an increase in landscaped or turf areas requiring additional watering, the District has implemented a water conservation program and has an agreement with the City to reduce water consumption by 2 million gallons per year to support the City's 20 percent water reduction goal (SMMUSD 2019). The water conservation efforts at Franklin Elementary School, including conducting water audits to identify inefficient or wasteful water consumption and using water monitoring software and smart water meters, contribute to the District's agreement with the City to conserve water. The Proposed Project would not affect any regional groundwater management measures in the Groundwater Sustainability Plan, and would have a less than significant impact on the Santa Monica Groundwater Basin groundwater management and replenishment activities.

4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Overview

The SMMUSD proposes to reconfigure and improve the existing Franklin Elementary School campus. As discussed in Section 3.0, Project Description, of this IS/MND, the Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility over four phases. The Proposed Project's site is zoned and designated by the City of Santa Monica as Institutional/Public Lands (PL) for the western portion of the Proposed Project's site and Multi-Unit Low-Density Residential (R2) for the northeastern parcel of the Proposed Project's site along Montana Avenue. No changes are proposed in current land use designations or zoning.

Discussion of Impacts

4.11-a Physically divide an established community?

***No Impact*.** While there are developed residential uses within the vicinity, the Proposed Project is located within an established school campus, the original construction of which dates back to 1924 and underwent reconstruction in 1937 and expansion to the northeastern parcel along Montana Avenue in 1948. The Proposed Project's activities would occur entirely within the campus. Therefore, no impacts related to the physical division of an established community would result from the Proposed Project.

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

***Less than Significant Impact*.** The Franklin Elementary School campus has a City of Santa Monica General Plan and zoning designation of Institutional/Public Lands (PL) for the western portion of the Proposed Project's site and Multi-Unit Low-Density Residential (R2) for the northeastern parcel of the campus along Montana Avenue (City of Santa Monica 2022; City of Santa Monica 2021b). The PL zoning district permits public or semi-public facilities, including municipal offices, schools, libraries, museums, performance spaces, cemeteries, corporation yards, utility stations, and similar uses. The R2 zoning district permits two or more dwelling units within a single building or within two or more buildings on a site or parcel.

All activities associated with the Proposed Project would occur on the Franklin Elementary School campus. Implementation of the Proposed Project would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change. No changes to the existing land use designation or zoning are required or proposed with the Proposed Project. Additionally, the Proposed Project would result in a continuation of the existing use of the site (academic uses), and would not conflict with the intended use of the campus or with surrounding land uses. For the reasons above, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
MINERAL RESOURCES. Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Overview

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

Discussion of Impacts

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

***No Impact*.** According to the CDOC California Geologic Emergency Management Division (CalGEM), no mineral resource recovery sites are located on or in the immediate vicinity of the Proposed Project's site. The nearest oil and gas well to the Proposed Project's site is located approximately 0.55 miles to the northeast along Berkeley Street, which is categorized as being idle. An additional oil and gas well is located approximately 0.94 miles to the northeast along S. Gretna Green Way; this well is identified as plugged (CDOC n.d.). No other types of mineral resources are identified on or near the campus in the City's General Plan. As a result, the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and no impact would occur.

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

No Impact. As discussed in Response 4.12-a. above, no mineral resource recovery sites are located on or in the immediate vicinity of the campus. Therefore, the Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

4.13 NOISE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE. Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Overview

Sound is mechanical energy transmitted by pressure waves in a compressible medium, such as air, and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear deemphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of approximately 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and approximately 7.5 dBA per doubling of distance.

There are a number of metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period of time is often evaluated based on the day-night sound level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10 dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime

hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. Similarly, community noise equivalent level (CNEL) is a measure of 24-hour noise levels that incorporates a 5 dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10 dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Two methods that reduce levels of environmental sounds are increasing the distance and/or having intervening obstacles, such as walls, buildings, or terrain features, between the sound source and the receiver. Factors that act to increase the loudness of environmental sounds include moving the sound source closer to the receiver, sound enhancements caused by reflections, and focusing of sound caused by meteorological conditions.

Regulatory Setting

State of California

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 land use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of CNEL. A noise environment of 50 CNEL to 60 CNEL is considered to be "normally acceptable" for residential uses. OPR recommendations also note that, under certain conditions, more restrictive standards than the maximum levels cited may be appropriate.

Local

City of Santa Monica

City of Santa Monica General Plan

The City's General Plan Noise Element also 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 Ordinance places limitations on noise produced by equipment operation, human activities, and construction. 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 (SMMC)

SMMC Chapter 4.12 (Noise) includes limitations on unnecessary, excessive, and annoying noises in the City. The following sections from the SMMC are applicable to the Proposed Project:

Section 4.12.030 – Exemptions

Section 4.12.30 of the SMMC 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

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; except, 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 (refer to **Table 4.13-1**). 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 4.13-1 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 through Friday**		
	10 p.m. to 7 a.m.	50 dBA	55 dBA
	7 a.m. to 10 p.m.	60 dBA	65 dBA
	Saturday and Sunday		
	10 p.m. to 8 a.m.	50 dBA	55 dBA
	8 a.m. to 10 p.m.	60 dBA	65 dBA
II	**All days of week**		
	10 p.m. to 7 a.m.	60 dBA	65 dBA
	7 a.m. to 10 p.m.	65 dBA	70 dBA
III	Anytime	70 dBA	75 dBA

Source: Santa Monica Municipal Code Section 4.12.060.

Section 4.12.070 – 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 a.m. and 6:00 p.m. on Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturday, with some exceptions for construction that the City deems to be in the public interest. Construction activity is prohibited on Sunday 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 a.m. and 3:00 p.m. 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 is required to be provided to persons occupying property within 500 feet of the proposed construction activity. The form of the notification shall be approved by the City and contain procedures for the submission of public comments, prior to the approval of the permit.

Existing Conditions

Existing Noise Sources

The Proposed Project area is subject to typical urban noises, such as noise generated by traffic, school-related, and day-to-day outdoor activities. Noise around the school campus 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 site is primarily subject to traffic noise generated from adjacent roadways.

Noise Measurements

In order to quantify existing ambient noise levels in the Proposed Project's area, Michael Baker conducted five (total) short-term noise measurements on January 21, 2022; refer to **Table 4.13-2**. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Proposed Project's site. The 10-minute measurements were taken between 8:00 a.m. and 10:00 a.m. To establish noise levels during both the peak student drop-off time and ambient conditions, two noise measurements were conducted at both Site 1 and Site 3; only one noise measurement was conducted at Site 2. Refer to Appendix E, Noise Data, and **Figure 4.13-1, Noise Measurement Locations**.

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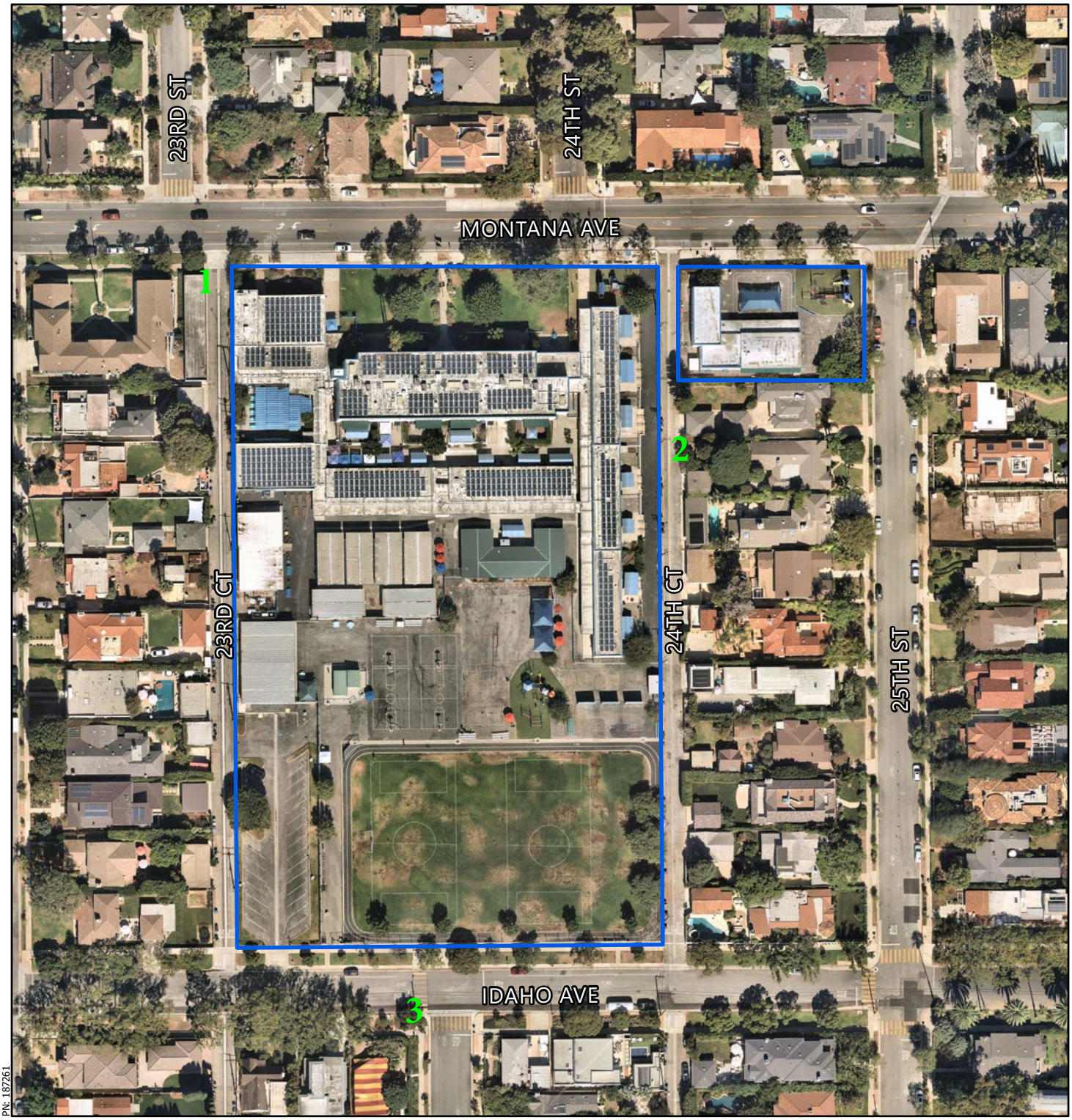

PN: 187261

Project Area

1 Noise Measurement Locations

Michael Baker INTERNATIONAL

0 50 100 200 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Santa Monica, California*

FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Noise Measurement Locations

Figure 4.13-1

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TABLE 4.13-2 NOISE MEASUREMENTS

Site No.	Location	Condition	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	Alley entrance between Franklin Elementary School and 2316 23rd Street	Drop-Off	66.1	46.7	86.1	8:21 a.m.
		Ambient	65.6	40.9	76.5	9:00 a.m.
2	Alley between Franklin Elementary School and the backyard of 818 25th Street	Ambient	53.5	43.8	68.4	9:21 a.m.
3	South corner of intersection of Idaho Avenue and 24th Street	Drop-Off	57.3	47.8	71.3	8:06 a.m.
		Ambient	53.5	40.5	67.2	9:38 a.m.

Source: Appendix E, Noise Data.

Meteorological conditions when the measurements were taken were clear skies, cool temperatures, with moderately light wind speeds (less than five miles per hour), and low humidity. Measured noise levels during the daytime measurements ranged from 53.5 to 66.1 dBA L_{eq}. The sources of peak noise are aircraft and traffic along Montana Avenue. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for Type I (precision) sound level meters. The results of the field measurements are included in Appendix E.

Sensitive Receptors

Sensitive populations are more susceptible to the effects of noise than the general population. Generally, a sensitive receptor is identified as a location where human populations (especially children, senior citizens, and sick persons) are present. 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. Land uses less sensitive to noise are business, commercial, and professional developments. Noise receptors categorized as being least sensitive to noise include industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, and transit terminals. Some of these types of land uses often generate high noise levels. Moderately sensitive land uses typically include multifamily dwellings, hotels, motels, dormitories, and outpatient clinics.

The nearest off-site noise-sensitive land uses in the Proposed Project's vicinity are single-family residences located immediately adjacent to the satellite school facility on the northeast corner of the Proposed Project's site. However, the distance from demolition, grading, and construction activities would change with each phase of construction. Refer to **Table 4.13-3**, **Off-site Sensitive Receptors**.

TABLE 4.13-3 OFF-SITE SENSITIVE RECEPTORS

Site Number	Description	Location	Distance from Project Site (feet)
1	Single-Family Residential	North	75
2	Single-Family Residential	South	80
3	Single-Family Residential	East	20
4	Single-Family Residential	West	20
5	Multi-family Residential	Northwest	20
5	Single-Family Residential	South of Satellite Facility	Immediately Adjacent to the Satellite Facility

Source: Google Earth Pro. Accessed October 22, 2024.

On-site noise-sensitive receptors would include students in classrooms. During each construction phase, displaced school faculty and students would be relocated to different locations on campus as needed.

Discussion of Impacts

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

Less than Significant Impact with Mitigation Incorporated.

Short-Term Noise Impacts

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction activities associated with the Proposed Project would include demolition, grading, building construction, paving, and architectural coating. Ground-borne noise and other types of construction-related noise impacts typically occur during the initial demolition and earthwork phases. These phases of construction have the potential to create the highest levels of noise.

The Proposed Project would be implemented in four phases (Phases 1A and 1B and Phase 2 through 4); however, the District is proceeding with design and engineering of the first phase (Phases 1A and 1B), with subsequent phases occurring at the District's discretion when funding becomes available. Construction of Phase 1A is expected to commence in 2026, with full buildout of the Proposed Project by approximately 2040. The estimated construction schedule for each phase is shown in **Table 3-2**, **Construction Schedule**. Because the school campus has been fully developed, construction of each phase would generally involve demolition of some existing structures, followed by minor grading and foundation work, building construction, and architectural coating.

The potential for construction-related noise to affect nearby sensitive receptors would depend on multiple variables, including specific equipment types, size and number of equipment used, amount of time each piece is in operation, the load factor that the equipment is being used, and the location and proximity of construction activities to these receptors.

Off-Site Receptors

The closest sensitive receptors to the Proposed Project's site are the single-family residential uses approximately 20 feet to the east of the campus and immediately south of the existing satellite facility proposed in the northeast corner of the Proposed Project's site. According to the FTA *Transit Noise and Vibration Impact Assessment Manual* General Noise Assessment methodology (FTA 2018), noise can be considered as concentrated at the center of the site. As such, estimated noise levels were calculated from the center of the Proposed Project site. Although the closest sensitive receptor is located approximately 20 feet to the east of the campus and immediately south of the existing satellite facility when measured from the boundary, the geographic center of the campus is approximately 205 feet from the closest sensitive receptor (residential use). The following analysis quantifies noise levels from construction activities at occurring at a distance of 205 feet (center of the Proposed Project site).

SMMC Section 4.12.110 sets limits for noise from construction activities relative to the noise standards set in SMMC Section 4.12.060, with the equivalent noise level not to exceed 20 dBA above standards and the maximum instantaneous noise level (L_{max}) not to exceed 40 dBA above standards. Land uses surrounding the campus are located in Noise Zone I. Typical noise levels generated by the Proposed Project's construction equipment are shown in **Table 4.13-4** and were modeled using the Federal Highway Administration's Roadway Construction Noise Model (RCNM). To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment is assumed to operate simultaneously; refer to Appendix E. Results from RCNM also assume a clear line-of-sight and no other machinery or equipment noise that would mask construction noise generated by the Proposed Project; however, shielding of buildings and other barriers that interrupt line-of-sight conditions would help further reduce noise levels below those shown in **Table 4.13-4**. The construction equipment list is based on CalEEMod. Per CalEEMod defaults, Proposed Project construction activities would utilize similar construction equipment; however, Phases 1A and 1B would require the use of more equipment than Phase 2 through Phase 4 due to preliminary site grading and excavation activities. Other primary sources of acoustical disturbance would be due to random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

TABLE 4.13-4 NOISE LEVELS GENERATED BY CONSTRUCTION EQUIPMENT

Construction Phase	Estimated Exterior Construction Noise Level at 205 feet (Center of Proposed Project Site) (dBA L_{eq})
Phase 1A	
Demolition	75.1
Grading	73.6
Building Construction	71.2
Paving	70.8
Architectural Coating	61.4
Phase 1B	
Demolition (Staff Parking Lot and Soccer Field)[1]	74.2
Grading (Staff Parking Lot and Soccer Field)[1]	72.3
Paving	72.0
Phase 2 through Phase 4	
Demolition	74.2
Grading	72.3
Building Construction	71.6
Paving	72.0
Architectural Coating	61.4

Notes:
Phase 1 would occur in two phases: Phase 1A for construction of the staff parking lot (temporary), TK/K facilities, and temporary athletic field, and Phase 1B for construction of the new U-10 soccer field and permanent faculty and staff parking lot. Phase 1A and Phase 1B would utilize the same construction equipment, and therefore, resulting construction noise levels are anticipated to be similar.
Source: Federal Highway Administration, Roadway Construction Noise Model (RCNM), 2006 (Appendix E).

Construction Equipment Noise Impacts

As shown in **Table 4.13-4**, the nearest receptors to the site could be exposed to temporary and intermittent construction noise levels ranging from approximately 61.4 to 75.1 dBA L_{eq}. As previously mentioned, 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 and no nighttime construction work is anticipated to occur. However, as appropriate, the District may request a waiver from the City to allow for construction to occur outside of the standard hours of construction. As needed, a noise permit from the City authorizing construction activity to begin at 7:00 a.m. on weekdays may be requested. Approval of the permit would allow construction workers to arrive on the school campus and begin working prior to the arrival of students.

Construction activities undertaken during permitted hours are a typical part of living in an urban environment and do not cause a significant disruption. The Proposed Project's construction activities would be conducted during allowable hours per the SMMC, unless otherwise allowed with City approval. Based on the analysis above, construction noise would not have the potential to exceed the 80 dBA L_{eq} threshold (60 dBA daytime [7:00 a.m. to 10:00 p.m.] residential exterior threshold plus 20 dBA L_{eq} increase) pursuant of SMMC Section 4.12.060. Additionally, noise levels in **Table 4.13-4** assume that construction equipment would be operating simultaneously and does

not factor in noise shielding from existing classrooms that may block the line-of-sight to sensitive receptors.

While the Proposed Project's construction noise levels would not exceed adopted noise thresholds, the Proposed Project would implement mitigation measure **NOI-1** to further lessen construction noise to the extent feasible. Mitigation measure **NOI-1** would require the District, through its construction contractor, to prepare a construction noise control plan that incorporates best management practices during construction to reduce noise nuisances. Implementation of mitigation measure **NOI-1** would further minimize impacts from construction noise as it would require construction equipment to be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices, such as noise shielding devices. Thus, with implementation of mitigation measure **NOI-1**, impacts would be less than significant.

Construction Truck Noise Impacts

In addition to construction noise on-site, construction activities would also 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 receptors along roadway segments leading to the Proposed Project's site. The maximal hauling during construction of the Proposed Project would occur during Phase 1B and is estimated to export approximately 2,300 cubic yards of soil. Based on Proposed Project's construction estimates, it is anticipated that construction would generate a maximum of 13 hauling trips per day (during Phase 1B), 20 worker trips per day (during Phase 1B), and five vendor trip per day (during Phase 2); refer to Appendix E. As a result, mobile source noise would increase along access routes to and from the Proposed Project's site during construction, mainly along Idaho Avenue. Per Caltrans' Technical Noise Supplement, a doubling of traffic volumes would result in a 3 dB increase in traffic noise levels, which is barely detectable by the human ear (Caltrans 2013). A total of 38 construction-related truck trips per day would not double existing traffic volumes along Montana Avenue or Idaho Avenue, and any increase in traffic noise levels would be imperceptible. Further, SMMC Section 4.12.110 restricts the hours for construction activity to between 8:00 a.m. and 6:00 p.m. Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturday. However, a permit maybe issued authorizing certain construction activity outside of the restricted hours if such allowances are found to be in the public interest. The District intends on obtaining this permit to conduct allowable construction activities after normal hours, but not during typical sleeping hours. Therefore, upon compliance with the City's allowable construction hours, or in accordance with City approval for allowable exceptions for construction activities per SMMC Section 4.12.110(e), noise impacts from Proposed Projects construction activities would be less than significant.

Long-Term Noise Impacts

The Proposed Project would not result in an increase in noise over existing conditions. The new construction and reconfiguration of the Franklin Elementary School Campus would not increase the number of HVAC units on the buildings or decrease the distance to the nearest sensitive receptors. Additionally, the Proposed Project would not involve an increase in student enrollment

at the school. As a result, the traffic generated by student drop-off/pick-up is not expected to increase. In addition, although the project would relocate on-site athletic fields and playgrounds, these facilities would be located at approximately the distance from the nearest sensitive receptors, and therefore noise levels from athletic, theatrical, and community events that take place after standard school hours, are not expected to increase. Per SMMC Section 4.12.30, activities conducted on public parks, public playgrounds, and public or private school sites are exempt from noise laws and ordinances. Therefore, operational noise impacts as a result of the Proposed Project would be less than significant.

Mitigation Measure:

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, are equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of Proposed Project construction. 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 District that equipment is properly muffled, shielded, and maintained. All equipment shall be properly maintained to ensure that no additional noise due to worn or improperly maintained parts would be generated.

- The construction noise control plan shall depict the location of construction equipment storage and maintenance areas, and document methods to be employed to minimize noise disruptions 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 District 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 District's Facility Improvements 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 construction contractor shall demonstrate to the satisfaction of the District's Facility Improvements 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.

4.13-b Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact with Mitigation Incorporated.

Construction Vibration Impacts

Proposed Project construction would have the potential to generate varying degrees of ground-borne vibration, depending on the construction procedure and the construction 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 located in the vicinity of a 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.

Types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. The Caltrans *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. This evaluation uses the Caltrans architectural damage thresholds for continuous vibrations of 0.3 inch/second peak particle velocity (PPV) for older residential structures and 0.25 inch/second PPV for historical and some older buildings. Typical vibration levels produced by construction equipment expected to be used for the Proposed Project are listed in **Table 4.13-5**, **Typical Vibration Levels for Construction Equipment**.

TABLE 4.13-5 TYPICAL VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Reference peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 10 feet (inch/sec)	Approximate peak particle velocity at 15 feet (inch/sec)	Approximate peak particle velocity at 20 feet (inch/sec)
Large Bulldozer	0.089	-	0.1915	0.1244
Loaded Trucks	0.076	-	0.1635	0.1062
Small Bulldozer	0.003	0.0119	0.0065	0.0042
Vibratory Rollers	0.210	-	-	0.2935

Notes:
1. Calculated using the following formula:
PPV equip = PPV ref x (25/D)$^{1.5}$
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 7-4 of the FTA Transit Noise and Vibration Impact Assessment Guidelines
D = the distance from the equipment to the receiver
Source: California Department of Transportation, Transportation and Construction Vibration Manual, April 2020.

Groundborne vibration decreases rapidly with distance. The nearest sensitive receptors to where major construction activities would occur are the existing single-family residences located approximately 10 feet to the south of the nearest construction activities on the satellite facility and 20 feet to the east of the nearest construction activities on the main campus, across the 24th Place alleyway. It should be noted that due to the limited size of the satellite campus, loaded trucks and large construction equipment such as large bulldozers would not be accommodated on-site, and therefore, would not operate near the residence to the south; for these reasons, the use of only small bulldozers was analyzed. As indicated in **Table 4.13-5**, vibration velocities from small bulldozers would be approximately 0.0119 inch/second PPV at 10 feet, and vibration velocities from typical heavy construction equipment would range from 0.0042 to 0.1244 inch/second PPV at 20 feet, which would not exceed the 0.3 inch/second PPV thresholds for older residential structures.

It is anticipated that vibratory rollers would be used during construction of the proposed surface parking lot on the existing satellite campus for laying the asphalt, as well as elsewhere on the campus for soil compaction. As shown in **Table 4.13-5**, at a distance of 20 feet, vibratory rollers would result in vibration velocities of 0.2935 inch/second PPV which would not exceed the 0.3 inch/second PPV thresholds; impacts at this distance would be less than significant.

The existing residence to the south of the satellite campus is located approximately 5 feet from the southern property line. As such, the use of vibratory rollers in constructing the proposed parking lot at a distance of less than 15 feet from the property boundary (i.e., less than 20 feet from the off-site residence) would have the potential to generate vibration velocities that exceed the 0.3 inch/second PPV threshold, thereby resulting in a significant impact. Mitigation measure **NOI-2** is therefore proposed to restrict the use of vibratory rollers for construction of the proposed satellite parking lot to greater than 15 feet from the southern property boundary of the satellite campus; rather, alternative equipment would be used (i.e., heavy rollers, oscillating rollers) within such distances, and monitoring would be required during active construction to ensure that vibration velocities remain below the acceptable threshold. The use of vibratory

rollers would not be required for proposed perimeter landscaped areas within the parking lot, nor would the use of such equipment be restricted at a distance of greater than 15 feet from the southern property boundary.

Similarly, existing single-family residences (across the 24th Place alleyway) are located approximately 20 feet to the east of the nearest construction activities planned on the main campus. As the use of vibratory rollers at a distance of 20 feet would result in vibration velocities of 0.2935 inch/second PPV, use of such equipment at a closer distance may cause exceedance of the 0.3 inch/second PPV threshold, resulting in a significant impact. Implementation of mitigation measure **NOI-2** would therefore ensure that proper distance is maintained or that alternative means are used to meet required vibration levels during construction.

Additionally, there is a historic building on-site (Building B), that would be located as close as 15 feet from the nearest major construction activities. Based on **Table 4.13-5,** vibration velocities from typical heavy construction equipment operations anticipated to be used during Proposed Project construction range from less than 0.0065 to 0.1915 inch/second PPV at 15 feet from the source of activity and would not exceed the 0.25 inch/second PPV threshold for historic buildings; it is not anticipated that the use of vibratory rollers would be required at a distance of less than 15 feet from Building B. Impacts would be less than significant in this regard.

Operational Vibration Impacts

The Proposed Project's operation would not include or require equipment, facilities, or activities that would result in perceptible groundborne vibration. Operation of the Proposed Project may require daily bus activities; however, 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.[11] As such, the Proposed Project's operations would not create perceptible vibration impacts to the nearest sensitive receptors. A less than significant impact would occur pertaining to vibration impacts from operation of the Proposed Project.

Mitigation Measure:

NOI-2 The construction contractor shall utilize a construction vibration monitoring system with the ability to measure low levels of vibration (i.e., 0.3 inch/second PPV) to ensure that the architectural damage criterion (0.3 inch/second PPV) is not exceeded at any off-site structure. If vibrations are measured at 0.3 inch/second PPV or above, construction in the area shall cease and alternate methods shall be employed to ensure the architectural damage vibration criterion is not exceeded.. The greatest potential for this criterion to be exceed during Proposed Project construction is from the use of vibratory rollers within 15 feet of the southern property boundary of the satellite campus or within 20 feet of the easterly property boundary of the main campus. Alternate equipment and/or construction techniques, such as oscillating rollers, or other similar equipment with a lower vibratory intensity, are available to be utilized should measure construction

[11] Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual.

vibration velocities approach or exceed 0.3 inch/second PPV at the closest off-site structure.

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

No Impact. The campus is not located within an airport land use plan and there are no public or private airports or airstrips within 2 miles of the campus. The nearest airport to the Proposed Project's site is the Santa Monica Municipal Airport, located at 3233 Donald Douglas Loop South in the City of Santa Monica, approximately 2.4 miles to the southeast; the campus is not located within the Santa Monica Municipal Airport CNEL contours (Santa Monica 2021c). Therefore, the Proposed Project's implementation would not expose people residing or working in the campus area to excessive airport noise levels. No impact would occur.

4.14 POPULATION AND HOUSING

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

Overview

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

Discussion of Impacts

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

***No Impact*.** The campus is located within an established school campus, and no new roads or extensions of existing roads are proposed. The Proposed Project does not include the construction of any new homes or businesses. As discussed in Section 3.0, Project Description, of this IS/MND, construction activities of the Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility over four phases. Implementation of the Proposed Project would not increase the capacity of Franklin Elementary School, nor would the attendance boundaries change. Similar to other construction projects in the region, the Proposed Project's construction workers are expected to be drawn from the large, available regional labor force, who would commute to the campus during the construction phases. As such, the Proposed Project would not induce construction employees to move to the Proposed Project's vicinity. Therefore, no direct or indirect increases in population growth would result with the Proposed Project's implementation, and no impact would occur.

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

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

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Overview

Fire Protection

The City of Santa Monica Fire Department (SMFD) provides fire protection and emergency medical services to the campus. The SMFD operates five fire stations throughout the City that respond to over 16,000 calls for service each year (Santa Monica n.d.-a). The SMFD provides full-time fire and paramedic services, fire prevention, urban search and rescue, hazardous material response, and airport firefighting capabilities. The fire station closest to the Proposed Project's site is Station #3 located at 1302 19th Street, approximately 1.1 miles south. Fire Station 3 has two paramedic-staffed fire engines, and the station's crews respond to all fire and life safety emergencies in their district, including medical emergencies (Santa Monica n.d.-b).

Police Protection

The Santa Monica Police Department (SMPD) provides law enforcement services to the Proposed Project's site. The police department is located at 333 Olympic Drive, approximately 2.9 miles southwest of the Proposed Project's site. As of October 2024, the SMPD had 483 staff positions, including 233 sworn police officers and 250 civilian staff members (Santa Monica n.d.-c). SMPD personnel are organized into five divisions: Office of the Chief, Special Operations, Criminal Investigations, Patrol Operations, and Professional Services. Additionally, the SMPD has a Neighborhood Resource Office Program, comprising eight officers that are assigned to four geographic areas within the City and work alongside Crime Prevention Coordinators to address issues affecting the neighborhoods. The campus is located within Beat 4 for the Neighborhood Resource Office Program (Santa Monica n.d.-d).

Schools

The SMMUSD serves 8,700 students in transitional kindergarten through twelfth grade in eight elementary schools, three middle schools, two comprehensive high schools, a continuation high school, a K–8th grade alternative school, and Project-Based Learning High School pathway. The District is also home to 11 early childhood education centers and an adult school (SMMUSD 2024).

Parks

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

Other Public Facilities

Other public facilities in the City include public libraries and City administrative facilities. The Santa Monica Public Library has five branch libraries that serve the City (Santa Monica n.d.-f). The closest branch library to the Proposed Project's site is the Montana Branch Library, located at 1704 Montana Avenue, 0.6 miles west. City facilities include the PAL Youth Center, Camera Obscura Art Lab, Ken Edwards Center, and Miles Playhouse.

Discussion of Impacts

4.15-a Fire protection?

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

New buildings, as well as those proposed for upgrading, would be subject to current fire code and SMFD requirements for fire alarm and sprinkler systems, fire flows, and any firefighting equipment, fire hydrants, and emergency access. All improvements would be designed and constructed in conformance with applicable fire code standards at the time of construction and would be subject to plan review to ensure that potential hazards to life or property in the event of a fire are minimized. Further, the Proposed Project would be designed in accordance with Division of the State Architect requirements to ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by the Division of the State Architect and the California Building Code (Title 24 of the California Code of Regulations). The Division of the State Architect would review fire department and emergency access roadways and school drop-off and pickup areas to ensure that adequate emergency access is maintained. Fire alarm systems, elevator systems, and building occupancies would also be reviewed for compliance with current safety standards and regulations. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire.

During construction, which would span multiple years, notice to and coordination with the SMFD would be ongoing and emergency access to all portions of the Proposed Project's site would be maintained. Additionally, the Proposed Project would be constructed in accordance with

applicable City, county, and state regulations, codes, and policies pertaining to fire hazard reduction and protection.

As noted previously, improvements are planned in the vicinity of the school campus as part of the City's SRTS program to enhance student safety and pedestrian circulation. Improvements are planned along Idaho Avenue as part of the program to construct several new curb extensions. The planned improvements would be completed before construction of Phase 1 of the Proposed Project commences, and therefore, such activities would not conflict, nor adversely affect, the provision of fire protection services.

For the reasons above, the Proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives such that environmental impacts would result. Impacts would be less than significant.

4.15-b Police protection?

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

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

4.15-c Schools?

***No Impact*.** The Proposed Project would help meet the goals of the District through updating the campus to have adaptable learning spaces, larger classrooms, larger multipurpose rooms, new shared spaces, and more recreational/open space. The Proposed Project would increase the campus building area by approximately 29,286 (gross) square feet (from 63,002 square feet to 92,288 square feet), which would allow for more classrooms and storage, and creation of flexible teaming spaces which can be split into additional classrooms. The planned two-story building at the campus perimeter along 24th Place would open up the heart of the campus for better visibility and more shared activities while providing a clearer security perimeter. As such, the Proposed Project would have a beneficial impact to the District. Additionally, implementation of the Proposed Project would not increase the capacity of the school, nor would the attendance

boundaries change. Therefore, the Proposed Project would not create a need for new or expanded schools and no impact would occur.

4.15-d Parks?

***No Impact*.** An increase in population or housing is generally associated with an increase in demand for parks. The Proposed Project would not increase the capacity of the school nor result in an increase in housing or population in the City. Therefore, the Proposed Project would not create a need for new or expanded parks or cause substantial adverse physical impacts on existing parks. No impact would occur in this regard.

4.15-e Other public facilities?

No Impact. An increase in population or housing is generally associated with an increase in demand for other public facilities. As the Proposed Project would not increase the capacity of the school nor result in an increase in housing or population in the City, it is not anticipated that implementation of the Proposed Project would impact other public facilities. No impact would occur.

4.16 RECREATION

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
RECREATION.				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the Project include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Overview

The City of Santa Monica Community & Cultural Services (CCS) Department is responsible for overseeing park planning, programming, and staffing the Recreational and Parks Commission. The CCS Department's Open Space Management Division develops policy and coordinates all park and beach-based services. The City of Santa Monica Community Maintenance Department is responsible for the daily ongoing management and operation of all recreational facilities and parks in Santa Monica. Additionally, the City of Santa Monica Public Works Department is responsible for providing park maintenance for the City's parks, open space, medians, City facilities, and the Civic Center complex, as well as parks and recreation facilities, such as ball fields, courts, playgrounds, swimming pools, and gardens.

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

Parks and recreational facilities maintained by the City within the vicinity of the campus include Douglas Park, approximately 0.4 miles to the southeast; Colorado Center Park, approximately 0.9 miles to the southeast; and Christine Emerson Park, approximately 1.4 miles to the southwest. Will Rogers State Historic Park lies approximately 1.8 miles to the northwest, with the larger Topanga State Park and the Santa Monica Mountains just beyond to the northwest.

Discussion of Impacts

4.16-a Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

***Less than Significant Impact*.** The City of Santa Monica and the SMMUSD entered into a Master Facilities Use Agreement in May 2012, which was renewed in 2022. The agreement allows the City and the community to use the District's school facilities, including the Franklin Elementary School

campus. Under the Master Facilities Use Agreement, the Franklin Elementary School playfields, recreational facilities, and buildings are available for non-school programming rentals when school and school programs are not in session. The Master Facilities Use Agreement includes a Playground Partnership Agreement that provides recreation space use at Franklin Elementary School—including the playground facing Idaho Avenue, the athletic facilities (soccer field and basketball courts), and lawn areas along Montana Avenue—to Santa Monica children and families on weekends and during school breaks when school is not in session.

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

The Proposed Project proposes to replace and/or improve a number of existing recreational facilities on-site. As discussed in Section 3.0, Project Description, of this IS/MND, Phase 1A of the Proposed Project would include demolition of the existing soccer field, asphalt track, and basketball court; a temporary play field (approximately 160 feet by 140 feet) would be constructed on a portion of the former on-site parking lot. Phase 1B would include construction of a permanent synthetic turf soccer green (U10 soccer green) and running track in the southwestern portion of the site. Additionally, the existing handball walls in the eastern portion of the site would be removed. Phase 3 would include demolition of existing facilities located in the central portion of the campus, including the tetherball courts, hopscotch courts, and playground equipment; new foursquare courts, handball walls, tetherball and hopscotch courts, and playground equipment would be installed. Other improvements proposed with Phase 3 would include reorienting the outdoor space to accommodate three full basketball courts (from the existing one full and two half basketball courts).

No increase in student population would occur with the Proposed Project as proposed and, therefore, increased demand on the school's recreational amenities would not occur. The Proposed Project would not involve construction of recreational facilities beyond what is proposed to serve the existing and future students (as well as the public under continued implementation of the Master Facility Use Agreement). As the proposed facilities and upgrades would be adequate to serve the existing and future student population, increased demand for off-site recreational resources, parks, or other facilities within the City is not anticipated as a result of the Proposed Project's implementation.

As such, the Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that the substantial physical deterioration of recreational facilities would occur or be accelerated. Impacts would be less than significant in this regard.

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

Less than Significant Impact. Refer to Response 4.16-a, above. The campus is currently developed/disturbed with the existing elementary school facilities and associated recreational amenities. The Proposed Project would result in development of new and/or improved recreational facilities on the school property. However, environmental effects associated with the construction of such facilities are evaluated in this IS/MND as part of the Proposed Project. No adverse physical effects on the environment beyond those evaluated herein would occur. Further, no increase in student population would occur with the Proposed Project, and the Proposed Project does not propose housing that would result in population growth. As such, the Proposed Project would not require the construction or expansion of off-site recreational facilities. Impacts would be less than significant in this regard.

4.17 TRANSPORTATION

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

Overview

This section incorporates information from the Pedestrian/Circulation Safety Evaluation, prepared in February 2025 for the Proposed Project by Michael Baker International. Refer to Appendix F for additional information.

The campus is located in central Santa Monica in an urbanized residential and built-out portion of the City. Under current conditions, the main entrance to the campus and student drop-off/pickup area is off Montana Avenue, which bounds the school campus on the northwest. The main campus is bordered by 23rd Place to the southwest, 24th Place to the northeast, and Idaho Avenue on the southeast. The Proposed Project's site is three blocks or approximately 2,000 feet northwest of Wilshire Boulevard, 1.3 miles north of Interstate 10, 2 miles southwest of Interstate 405, and 1.75 miles northeast of Santa Monica State Beach and the Pacific Coast Highway.

The closest airport to the campus is the Santa Monica Airport, located approximately 2.2 miles southeast. However, the airport will be closed permanently after December 31, 2028 (Santa Monica 2024). The next closest airport is Los Angeles International Airport, approximately 7.4 miles south of the Proposed Project's site.

Discussion of Impacts

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

***Less than Significant Impact*.**

SCAG Regional Transportation Plan/Sustainable Communities Strategy

The Proposed Project would result in the modernization and redevelopment of the existing Franklin 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 an 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 Connect SoCal 2024 RTP/SCS. As the Proposed Project would operate in the same capacity as existing conditions, it would not conflict with the 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 Connect SoCal 2024 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 4.17-1**, the Proposed Project would be consistent with the intent of relevant goals and policies from the City of Santa Monica's General Plan.

TABLE 4.17-1
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 pedestrian access points to the campus along Montana Avenue (via main entry) and Idaho Avenue, providing drop-off and pickup zones to enhance student safety and avoid conflict with other area traffic. Therefore, operations at the school would remain compatible with the surrounding neighborhoods. No off-site improvements are proposed that would interfere with pedestrian movement.
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 28-space parking lot would be relocated to the satellite campus along Montana Avenue/24th Place and would be used by faculty and staff. Although access to the west of the parking lot to/from 24th Place would be provided, such access is not intended for daily use and would be limited to special circumstances, such as periodic events held at the school, thereby reducing the potential for vehicular conflicts with pedestrians crossing 24th Place along Montana Avenue. Relocation of the parking lot would avoid TK/K students having to cross the alleyway (24th Place) to access the main campus. Further, the Proposed Project would provide student drop-

TABLE 4.17-1, CONTINUED

Policy	Consistency
	off and pickup areas directly along Montana Avenue and Idaho Avenue to avoid students having to cross the roadway to access the campus and to ensure student safety during such times. Additionally, no net loss of on-site bicycle parking would occur with the Proposed Project. A total of 52 bicycle parking spaces would be provided at buildout to encourage students to bike to school; refer also to Appendix F which identifies existing and proposed bicycle parking with the Proposed Project.
Goal T8. Provide a beautiful and attractive pedestrian environment throughout the City.	**Consistent.** The Proposed Project would not include off-site improvements 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 drop-off and pickup areas directly along Montana Avenue and Idaho Avenue to avoid students having to cross the roadway to access the campus and to ensure student safety during such times.
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 28-space surface parking lot would be relocated to the satellite campus adjacent to Montana Avenue/24th Place. The new parking lot would be available to faculty and staff and would increase on-site parking capacity by 9 spaces (for a total of 37 spaces) to meet existing needs. 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 TK/K students along Idaho Avenue, • main entryway to the school campus along Montana Avenue, • enhancement of the community lawn along Montana Avenue and, • relocation of the existing 28-space parking lot to the satellite campus, along with increasing capacity to 37 spaces to meet existing needs; refer also 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 28-space parking lot would be relocated to the satellite campus along the span of Montana Avenue/24th Place and would be increased by 9 spaces (for a total of 37 spaces) to meet existing needs. The Proposed Project would not conflict with the SMMC.

Santa Monica Pedestrian Action Plan

The Proposed Project would include pedestrian access points to the campus along Montana Avenue (via main entry) and Idaho Avenue. As described below, the Proposed Project would not conflict with the City of Santa Monica Pedestrian Action Plan, adopted in 2016. The Pedestrian Action Plan recognizes and celebrates walking as a core part of Santa Monica's identity and character, while laying out a specific vision, standards, priority projects, and programs to guide improvements through 2031. The goals of the Plan are:

- **Goal 1:** Vision Zero. The safety of people walking in Santa Monica is a shared responsibility.

The City's Safe Routes to School (SRTS) program would provide pedestrian safety near the Franklin campus. The District would continue to coordinate with the City, as appropriate, at the time when any modifications to pedestrian accessways under the SRTS program are implemented.

- **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 school campus 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 school campus 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 Franklin campus, which currently serves the surrounding community. The Proposed Project would continue to serve local residents and would not be constructed in or modify the surrounding circulation network, including roads or pedestrian facilities. The Proposed Project would not alter attendance boundaries, and therefore would not alter or increase walking distance for students attending the school.

- **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 or 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 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 on-site circulation and access are provided. As appropriate, the District would also continue to coordinate with the City if the City implements any additional SRTS program improvements near the campus to encourage the viability of walking within surrounding neighborhoods; however, no off-site improvements are 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 ongoing implementation of the SRTS program; however, the Proposed Project would not modify the surrounding circulation network, including roads and pedestrian facilities. As off-site 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.

Safe Routes to School

As stated earlier, several improvements are planned to be implemented or have been recently constructed in the vicinity of the school at various intersections along Montana Avenue, Idaho Avenue, and Washington Avenue as part of the City's SRTS program. The improvements are intended to enhance student safety and pedestrian circulation, better facilitating student movement to and from the school. Additionally, improvements are planned along Idaho Avenue as part of the SRTS program to construct several new curb extensions. The planned improvements would be completed before construction of Phase 1 of the Proposed Project commences, and therefore, such activities would not overlap.

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 connections 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 school campus and would not be constructed 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.

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

Less than Significant Impact. CEQA Guidelines section 15064.3 pertains to the assessment of a project's potential transportation impacts based on the vehicle miles traveled (VMT) generated by a project (i.e., "the amount and distance of automobile travel attributable to a project," Section 15064.3[a]). The Proposed Project would improve the overall design of the campus, but would not change the land use, increase the capacity, or change the attendance boundaries of the school. The Proposed 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. Because total VMT is a function of the total number of trips multiplied by the average trip lengths, the Proposed Project would not result in a VMT increase. Therefore, impacts would be less than significant.

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

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

***Less than Significant Impact with Mitigation*.** The Proposed Project would improve the overall design of the campus, resulting in increased campus building area with increased classrooms and storage, and creation of flexible teaming spaces. No changes outside of the existing campus boundaries would occur and the use of the school would remain unchanged. During construction, vehicles associated with construction personnel commute trips would be a compatible use on the local road networks. However, as the Proposed Project's site is located within a residential neighborhood, haul trucks and equipment deliveries to and from the Proposed Project's site throughout the day may increase hazards. Thus, implementation of mitigation measure **TR-1** would be required during construction to reduce impacts to a less than significant level. Operation of the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses.

Mitigation Measure:

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:

- 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: Less than significant with mitigation incorporated.

4.17-d Result in inadequate emergency access?

***Less than Significant Impact*.** The City of Santa Monica Police Department implements its Emergency Response Plan to ensure that emergency access is provided and maintained throughout the City; refer to discussion under Response 4.9-f. The Proposed Project would not interfere with implementation of the plan or create conditions that would result in inadequate emergency access.

Construction of the Proposed Project would span multiple years and occur in phases. However, all construction activities would be confined to the Proposed Project's site with the exception of haul trucks, deliveries, and construction worker trips. Any construction-related traffic would be temporary and coordinated with operations of the school, ensuring that trucks are not moving in or out during drop-off or pickup times and emergency access is not impeded. During construction, ingress and egress to the Proposed Project's site would be maintained at all times. Notice to and coordination with emergency service providers, including the SMFD and SMPD, would be ongoing regarding the construction schedule and worksite traffic control plans so as to coordinate emergency response routing and maintain emergency access. During operation, emergency access to the Proposed Project's site would remain similar to existing conditions, with the exception that Phase 1A of the Proposed Project would add a fire truck turn lane within the southwestern portion of campus. Therefore, construction and operation of the Proposed Project would result in less than significant impacts related to inadequate emergency access.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Overview

Assembly Bill 52

Assembly Bill (AB) 52 requires the lead agency (in this case, the SMMUSD) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the Proposed Project prior to the release of a negative declaration, mitigated negative declaration, or EIR if: 1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of development projects proposed within the geographic area that is traditionally and culturally affiliated with the tribe, and 2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code Section 21080.3.1[d]). Pursuant to AB 52, the SMMUSD has compiled a list of California Native American tribes that have requested consultation regarding development projects on lands with which such tribes were culturally and traditionally affiliated. These tribes include the Torres Martinez Desert Cahuilla Indian tribe and the Gabrieleño Band of Mission Indians–Kizh Nation. Additional discussion is provided below.

AB 52 Tribal Consultation

Pursuant to AB 52 requirements, notification letters were prepared by the District and sent to Mr. Michael Mirelez, Cultural Resources Coordinator, of the Torres Martinez Desert Cahuilla Indians and Mr. Andrew Salas, Chairman, of the Gabrieleño Band of Mission Indians–Kizh Nation (Kizh Nation) via email and registered mail on September 12, 2024. The letter 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 Proposed Project's potential to impact tribal cultural resources.

No response was received from the Torres Martinez Desert Cahuilla Indians within the 30-day response period. On September 19, 2024, the SMMUSD received an email from Ms. Brandy Salas, Administrative Specialist of the Gabrieleño Band of the Kizh Nation with a letter attached from Mr. Andrew Salas, Chairman, dated September 19, 2024. The letter indicated that the Proposed Project's site is located within the Ancestral Tribal Territory of the Kizh Nation and that the tribe's Tribal Government was requesting to schedule consultation with the SMMUSD to discuss the Proposed Project and surrounding location in further detail.

On September 27, 2024, SMMUSD responded to Chairman Salas's request in an email identifying specific dates and times of availability of SMMUSD staff, including Carey Upton, SMMUSD's Chief Operations Officer, to hold a virtual meeting to discuss the tribe's request. Pursuant to AB 52 regulations, a tribe is given a period of 30 days in which to reply to a lead agency's outreach in response to tribal request for consultation. Ms. Salas replied on September 27, 2024, indicating availability of tribal members for a meeting. The meeting between representatives of the Kizh Nation and SMMUSD was held on November 12, 2024 at 3:00 p.m. Based on the discussion, members of the Kizh Nation indicated they would forward correspondence to the SMMUSD with recommendations for potential measures to address potential discovery of unknown cultural resources during ground disturbing activities associated with construction of the Proposed Project. The SMMUSD replied via email on December 19, 2024, requesting additional information regarding the location of potential tribal cultural resources in relation to the school campus, as well as information pertaining to construction monitoring activities; no reply from the Kizh Nation was received. A follow-up letter from the SMMUSD was emailed to Mr. Andrew Salas on January 30, 2025, requesting to receive the information noted by no later than February 10, 2025. No reply was received from the Tribe in response to the SMMUSD's request.

Known Resources within the Proposed Project's Area

The analysis as discussed below is based on the Franklin Elementary School Campus Plan; the Historical Resources Inventory Report for Franklin Elementary School (ARG 2022a; see Appendix B-1); and results of consultation efforts between the SMMUSD and the affected tribes, pursuant to AB 52 requirements.

Discussion of Impacts

4.18-a. Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or

4.18-b Cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact with Mitigation Incorporated. The subject campus has been developed and used for school-related activities for many years. The Proposed Project would result in demolition of existing facilities on-site. Specifically, the Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings;

construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility activities on the elementary school campus.

No known resources within the campus area have been 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 Proposed Project Site has been extensively disturbed by prior grading, construction, and use related to the campus' development history from the 1920s through the year 2000, which would have likely destroyed any tribal cultural resources that may have existed on the site. Refer also to Section 4.5, Cultural Resources.

However, as the potential for the Proposed Project's construction to impact unknown tribal cultural resources does exist, mitigation measures **TCR-1** to **TCR-3** would be implemented to reduce potential impacts to less than significant. Mitigation measures **TCR-1** to **TCR-3** would require the District to demonstrate that a qualified, on-call archaeologist and a tribal monitor meeting the Secretary of the Interior's standards are retained prior to each phase of construction to observe the Proposed Project's grading and other significant ground-disturbing activities; documentation of relevant ground disturbing activities and any discovered tribal cultural resources; cessation of the Proposed Project's construction activities if unknown resources are found in order to allow for evaluation of potential significance; proper documentation and treatment of the find, consistent with applicable federal, state, and local regulations; and, compliance with applicable state regulations in the unanticipated discovery of human remains. With implementation of mitigation measures **TCR-1** to **TCR-3,** potential impacts on tribal cultural resources would be reduced to less than significant. Refer also to Section 4.5, Cultural Resources, for additional discussion.

Mitigation Measures:

TCR-1: Monitor During Ground-Disturbing Activities

A. Monitoring for tribal cultural resources shall be conducted during the Proposed Project's construction ground-disturbance activities. The monitor shall meet the Secretary of the Interior's standards for professional archaeology and shall be retained prior to the commencement of ground-disturbing activity for the proposed project at the campus and satellite locations. "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor shall maintain monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Native Americans.

Monitoring logs shall identify and describe any discovered tribal cultural resources (TCRs), including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc. (collectively, "TCRs"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of the monitoring logs shall be provided to the District.

D. Monitoring shall conclude upon: (1) completion of ground-disturbing activities for the proposed project; or (2) a determination by the monitor that no future, planned construction activity and/or development/construction phase at the Proposed Project site has the reasonable potential to affect TCRs. Additionally, if after two weeks without discovery of any TCRs, the Santa Monica-Malibu Unified School District shall have the ability to suspend monitoring at that location.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any potential TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and the monitor shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the monitor, work shall be permitted to continue in the area. If deemed appropriate by the monitor, the appropriate Native American Tribe shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the Proposed Project site, then Public Resource Code 5097.9, as well as Health and Safety Code Section 7050.5, shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Overview

The City of Santa Monica Department of Public Works is responsible for wastewater, water, storm drainage, and solid waste services for the City, including the Franklin Elementary School campus.

Wastewater Collection and Treatment

Wastewater infrastructure in the City, including the Proposed Project's site, is maintained by the Santa Monica Water Resources Division. The City's wastewater system includes approximately 152 miles of pipelines, two flow monitoring and sampling stations, and one 26 million gallon per day (mgd) pumping station. Wastewater generated in the City is currently conveyed to the City of Los Angeles' Hyperion Water Reclamation Plant for treatment. On average, 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day. Because the amount of wastewater entering the plant can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd (Los Angeles n.d.).

Water Services

The City currently provides over 10,500 acre-feet of water annually to approximately 18,400 service connections, including to institutional uses such as schools, which accounts for 3 percent of total water usage in the City. In FY 2018-2019, Franklin Elementary School used approximately 2.2 million gallons of water, or approximately 185,000 gallons of water per month (SMMUSD 2022). The District has goals to reduce water consumption by 20 percent compared to the 2017-2018 baseline by 2025, and by 30 percent by 2030. To achieve this, the District is working with the City to implement water conservation and efficiency measures, such as installing faucet aerators; high-efficiency shower heads, toilets, and urinals; irrigation system repairs and controllers; and water monitoring software. The District is also working with the City of Malibu to install flow restrictors and pre-rinse spray valves for food service facilities.

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

TABLE 4.19-1 WATER SUPPLY AND DEMAND

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

Source: Santa Monica 2021a.

[1] Multiple Dry Years Scenario includes the average supply and demand for the five consecutive dry years from Table 7-5 of the 2020 UWMP.

Storm Drainage

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

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

Solid Waste

The District has adopted a solid waste program that strives to minimize waste production and landfill disposal resulting from daily operations and construction activities through the implementation of comprehensive waste minimization, reuse, recycling, organic waste, and education programs. The District has a goal of reducing total waste generation by 10 percent compared to the 2017-2018 baseline by 2025, and by 20 percent by 2030. The District also has a goal to increase diversion from landfills to 85 percent by 2030. Current initiatives include water bottle filling stations, banning plastic straws and containers, reusing green waste, and a trash-free lunch program, the latter of which Franklin Elementary participates in. The District is also committed to managing construction and demolition waste using waste prevention/diversion principles and strives to exceed the CalGreen (California Building Standards Code, Part 11) waste diversion requirements. According to the 2019 Districtwide Plan for Sustainability, Franklin Elementary School generated 229,416 pounds of waste, made up of 169,403 pounds of landfill waste, 50,193 pounds of recyclables, and 9,280 pounds of green waste, and had a diversion rate of approximately 26 percent in FY 2017-2018.

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

The Santa Monica Resource and Recycling Division provides solid waste and recycling collection in the City. The majority of the City's solid waste is disposed of at the Chiquita Canyon Sanitary Landfill. According to the figures published by the California Department of Resources Recycling and Recovery in 2019, the Chiquita Canyon Sanitary Landfill received approximately 64 percent of the City's waste, or 46,256 tons; Sunshine Canyon City/County Landfill received 24 percent, or 17,452 tons; and other landfills throughout the state received approximately 12 percent, or 8,824 tons (CalRecycle 2019a). The Chiquita Canyon Sanitary Landfill has a remaining capacity of 58,259,767 million cubic yards with a maximum permitted throughput of 12,000 cubic yards (CalRecycle 2019b). The Sunshine Canyon City/County Landfill has a

remaining capacity of 77,900,000 million cubic yards with a maximum permitted throughput of 12,100 cubic yards (CalRecycle 2019c).

Electricity and Natural Gas Facilities

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

Telecommunication Facilities

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

Discussion of Impacts

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

***Less than Significant Impact*.** The Proposed Project would not increase capacity as part of the Proposed Project. No additional demand for water from the City's water supply or increase in wastewater flows entering the City's wastewater treatment plant is anticipated. The newly constructed buildings would include water and energy conservation features that would be more efficient than existing systems, including low-flow plumbing that would serve to reduce the amount of wastewater entering the City's system. The Proposed Project would not require the construction of new water or wastewater facilities that would result in a physical impact to the environment. Impacts would be less than significant.

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

No electric power, natural gas, or telecommunications facilities would be relocated, constructed, or expanded as a result of the Proposed Project. No impact would occur related to these facilities.

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

***Less than Significant Impact*.** Construction of the Proposed Project would require nominal amounts of water for construction-related activities, such as dust suppression and washing equipment. These activities would not result in significant water demand and would cease after construction is complete. During operation, the Proposed Project would not result in measurable more water usage than existing conditions as the Proposed Project would not increase capacity. Additionally, the new school buildings would be designed to meet the California 2022 Building Code which would require installation of water conservation features, such as faucet aerators and high-efficiency toilets, and urinals. Thus, the Proposed Project has the potential to reduce water consumption from the campus. As shown in **Table 4.19-1** above, the City has adequate water supply to meet projected demand through 2040 during normal, dry, and multiple dry years. Therefore, impacts would be less than significant.

4.19-c Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?

***Less than Significant Impact*.** The Proposed Project would continue to be provided sanitary sewer service by the City of Santa Monica through its wastewater collection and treatment system, similar to existing conditions. As no increase in capacity is associated with development of the Proposed Project, the Proposed Project would not result in greater wastewater collection and treatment demand than that associated with current operations at the site. Impacts would be less than significant.

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

***Less than Significant Impact*.** During construction, the Proposed Project would generate solid waste from demolition of existing buildings and pavement. However, the Proposed Project is required to comply with construction and demolition waste prevention and diversion principles set by the District, which strives to exceed the CALGreen waste diversion requirements. Additionally, the generation of construction and demolition waste would cease once construction is complete.

During operation, as no increase in student population is anticipated with development of the Proposed Project, the Proposed Project would not measurably increase the amount of solid waste already generated by Franklin Elementary School. Additionally, the school would continue participating in the District's initiatives to increase diversion from landfills. Solid waste would continue to be disposed of at the Chiquita Canyon Sanitary Landfill in the City of Castaic, which has projected adequate capacity through 2047 (CalRecycle 2019b), the Sunshine Canyon City/County Landfill in the City of Sylmar, which has projected adequate capacity through 2037 (CalRecycle 2019c), and other landfills throughout the state. The Proposed Project would not substantially increase solid waste in the City and existing landfills have sufficient capacity to

accommodate the relatively minor amounts of waste that would be generated by the Proposed Project. Impacts would be less than significant.

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

Less than Significant Impact. The City of Santa Monica and the District comply with state requirements to reduce the volume of solid waste through recycling and organic waste diversion. The City's 2022 per capita disposal rates of 3.3 pounds per person per day (ppd) per residents and 3.5 ppd per employee are below the CalRecycle targets of 10.9 ppd per resident and 13.5 ppd per employee (CalRecycle 2019d). The District also implements its Sustainability Plan, which outlines its recycling, diversion, and waste generation goals.

The District currently complies with federal, state, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act and local recycling and waste programs. The District and its construction contractor would comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. CALGreen Section 5.408, Construction Waste Reduction, Disposal and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The Proposed Project would comply with all applicable federal, state, and local statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant.

4.20 WILDFIRE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Overview

According to current CalFire maps, the campus is not located in a State Responsibility Area (SRA) or a fire hazard severity zone (FHSZ); however, the site is designated as a Local Responsibility Area (LRA) (CalFire n.d). As such, the Proposed Project would not result in a significant impact relative to wildfire, as discussed below.

Discussion of Impacts

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

No Impact. As stated above, the campus is not located in or near an SRA or lands classified as very high fire hazard severity zones (VHFHSZ). Therefore, the Proposed Project would not impair an adopted emergency evacuation or response plan within such an area. No impact would occur in this regard.

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

No Impact. The Proposed Project site is not located in or near an SRA or lands classified as VHFHSZ. Therefore, the Proposed Project would not exacerbate wildfire risks or expose the Proposed Project's occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire within such an area. No impact would occur in this regard.

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

No Impact. The Proposed Project site is not located in or near an SRA or lands classified as VHFHSZ. The Proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment within such area. No impact would occur in this regard.

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

No Impact. The Proposed Project site is not located in or near an SRA or lands classified as VHFHSZ. Therefore, the Proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes within such an area. No impact would occur in this regard.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE.				
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wild-life population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the Project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?	☐	☐	☒	☐
c) Does the Project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?	☐	☒	☐	☐
d) Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion of Impacts

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

Less than Significant Impact with Mitigation Incorporated. The campus is currently developed and located in an urbanized residential setting. No riparian habitat or other natural habitat as designated by the CDFW and USFWS are present. The potential for the presence of special-status species to occur at the site is limited, as vegetation and animal species supported in the limited ornamental landscaping include species that are commonly found in urban environments. The Proposed Project has the potential to directly or indirectly impact nesting birds if construction activities occur during the nesting season (February 1 through August 31); however, compliance with the requirements of the MBTA via implementation of **PDF-BIO-1** would ensure that potential impacts on nesting birds remain less than significant.

Although no known cultural or tribal cultural resources are present on-site, mitigation measures **CUL-1** and **TCR-1** to **TCR-3** would be implemented to ensure that the Proposed Project's impacts to undiscovered cultural and/or tribal cultural resources are reduced to a less than significant level. Refer to Section 4.5, Cultural Resources, and Section 4.18, Tribal Cultural Resources.

With incorporation of such mitigation, the Proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant with mitigation incorporated and there would not be a mandatory finding of significance in this regard.

Mitigation Measures: Implement mitigation measures **CUL-1** and **TCR-1** to **TCR-3**.

Level of Significance: Less than significant with mitigation incorporated.

4.21-b Have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less than Significant Impact. The Proposed Project would not result in the achievement of short-term environmental goals to the disadvantage of long-term environmental goals. Potential short-term (construction phase) and long-term (operation phase) impacts that could occur as a result of the Proposed Project's implementation have been considered and evaluated herein in Sections 4.1 through 4.20. Such discussions consider the existing environmental setting and conditions; applicable policy and regulatory conditions; Proposed Project's characteristics; and findings of the Proposed Project's specific technical studies.

Where appropriate, mitigation measures have been identified to avoid potential impacts or to reduce potential impacts to a level of less than significant. The Proposed Project would be required to demonstrate conformance with applicable regulatory requirements at the local, state, and federal level and would not preclude the state from meeting its long-term environmental goals. Additionally, the Proposed Project would be consistent with measures identified in the SMMUSD Sustainability Plan to further ensure that the Proposed Project contributes to meeting the District's adopted goals and objectives for reducing or avoiding potential impacts on the physical environment, as well as those impacts that may contribute to adverse effects felt for generations to come (e.g., climate change and global warming). For the reasons above, the Proposed Project is not considered to have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Impacts would be less than significant and there would not be a mandatory finding of significance in this regard.

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

Less than Significant Impact with Mitigation Incorporated. A cumulative impact could occur if the Proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. No direct significant impacts were identified for the Proposed Project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the Proposed Project may result in the potential to contribute to a significant cumulative impact.

Similar improvements are being undertaken by the District at several school campuses within the City, including John Adams Middle School, Grant Elementary School, McKinley Elementary School, Will Rogers Learning Community, and Roosevelt Elementary School. Such improvements are anticipated to occur between 2024 to 2029. As such, construction activities would likely overlap with construction of the Proposed Project. McKinley Elementary School and Lincoln Middle School are within closest proximity to the Franklin Elementary School campus and would therefore have the greatest potential to contribute to cumulative impacts, in combination with the Proposed Project. Other development and infrastructure improvement projects are also proposed throughout the City of Santa Monica.

As described in Sections 4.1 through 4.20 of this IS/MND, construction activities associated with the Proposed Project would result in short-term and temporary environmental effects, including the following: changes to the visual setting; increases in air pollutants and noise levels; erosion and degradation of water quality; potential releases of hazardous materials into the environment; potential disturbance to nesting birds; potential destruction of cultural, tribal cultural, and paleontological resources; and increases in demand for utilities and services. The Proposed Project would also introduce new stationary noise sources. An evaluation of the potential for the Proposed Project to contribute to a cumulatively considerable impact is provided for each of these resource areas.

As discussed in Sections 4.1 through 4.20, the Proposed Project would have no impact related to the following resource areas: agriculture and forestry resources, mineral resources, population and housing, public services, recreation, and wildfire. Therefore, the Proposed Project would not contribute to a cumulative effect to these resources and no further analysis is required.

Aesthetics

The geographic scope for evaluating cumulative aesthetics impacts is the Franklin Elementary School campus and surrounding areas with views to and from the campus. The Proposed Project setting is highly developed and urbanized, with existing views consisting of one- and two-story buildings and ornamental landscaping associated with residential, commercial, and public facilities land uses. The cumulative study area also includes light sources that are characteristic of a typical urban environment, including lighting associated with buildings, wayfinding, sports fields,

streets, and vehicles. The City enforces standards to ensure that development complies with regulations governing scenic quality and lighting. Therefore, a less-than-significant cumulative impact exists in the area with respect to aesthetics.

Construction activities associated with the improvements to the Franklin Elementary School, in combination with improvements planned at other SMMUSD schools, could potentially overlap and be visible from neighboring communities. However, construction activities would generally be obscured by temporary fencing and would be short-term. Once constructed, the physical improvements would not obstruct any existing important views and would not have the potential to damage any scenic resources. Future development undertaken by the District would be required to comply with City zoning regulations governing scenic quality, as well as the District's BP 7113, which requires campus improvements to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation. As such, the architectural value of the individual school campuses would be preserved for the long-term. To minimize the potential for cumulative lighting effects, all new light sources would be directed on-site and would be of similar intensity as existing light sources in the surrounding area, thereby minimizing the potential to result in a measurable contribution to sky glow or night sky pollution. For the reasons above, the Proposed Project would not result in a cumulatively considerable contribution to cumulative aesthetics impacts.

Air Quality

The geographic scope for evaluating cumulative air quality impacts is the South Coast Air Basin, which is designated as a nonattainment area for ozone and $PM_{2.5}$ with respect to both the NAAQS and CAAQS and a nonattainment area for PM_{10} with respect to the CAAQS. Therefore, a significant cumulative impact exists in the South Coast Air Basin with respect to these criteria air pollutants.

Construction activities associated with the improvements to the Grant Elementary School, McKinley Elementary School, John Adams Middle School, Will Rogers Learning Community, and Roosevelt Elementary School campuses would result in cumulative air pollutant emissions when construction activities overlap with construction of the Proposed Project. Based on the analysis in Section 4.3-b, construction of the Proposed Project would not generate emissions of criteria air pollutants or precursors that would exceed SCAQMD's localized significance thresholds. These thresholds were developed as a metric to indicate whether a project's emissions would cumulatively contribute to the nonattainment designations in the South Coast Air Basin. Criteria air pollutant emissions would be further reduced because the District would require all construction contractors to utilize equipment with Tier 4 engines and comply with SCAQMD Rule 403, which regulates fugitive dust emissions. Health risks from air pollutants would be minor and at sufficient distance to not result in health effects to nearby sensitive receptors. Additionally, vehicle trips generated from construction of these projects would not result in traffic volumes at intersections around the Franklin Elementary School campus that would exceed 100,000 vehicles per day and would not contribute to CO concentrations that exceed standards. Furthermore, impacts related to odors would not be cumulatively considerable because odors would dissipate rapidly from the source with an increase in distance.

Following construction, the Proposed Project would not introduce new stationary sources of emissions. Additionally, the Proposed Project would not increase capacity or enrollment at the school, and therefore would not result in long-term increases in vehicle trips during operations. Therefore, the Proposed Project would not result in operational emissions that would exceed SCAQMD's localized significance thresholds.

The Proposed Project, in combination with the proposed improvements at other District campuses, would not expose sensitive receptors to quantities of pollutants greater than significance thresholds or to significant risks of adverse health impacts. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Biological Resources

The geographic scope for evaluating cumulative biological resources impacts is the campus and surrounding areas within a 0.5-mile buffer. This area is characterized as highly developed and urbanized and offers limited habitat for sensitive biological resources.

Implementation of the cumulative projects would occur on developed properties with low biological habitat value. However, ornamental trees could potentially provide habitat for migratory birds, and some of the projects could involve removal of these trees. However, all projects are required to comply with the MBTA and implement measures to avoid the take or destruction of nesting birds. The Proposed Project's compliance with MBTA would avoid impacts on nesting birds; therefore, project-level impacts are less than significant. As a result, the Proposed Project would not in a cumulatively considerable contribution to significant cumulative impacts on biological resources.

Cultural Resources

The geographic scope for evaluating cumulative cultural resources impacts is the Southern California region. Significant historic and archaeological resources have been documented within the region; however, many have been destroyed or substantially altered as the result of ongoing development. Although extensive regulations have been adopted for the protection of such resources, many were destroyed during the period before such protection measures were in place through grading and excavation activities associated with construction.

As discussed in Section 4.5, Cultural Resources, the Proposed Project includes building demolition and new building construction on-site. The original campus building (Main Building) on the Franklin Elementary School site was evaluated for historical significance and determined to be individually eligible for listing in the CRHR and for local (City of Santa Monica) listing. The evaluation also included the lawn at the front (north) of the site. No other buildings or site features located on the campus satisfy the definition of a historical resource for purposes of CEQA (ARG 2022a). The Proposed Project does not include demolition or any exterior changes to the Main Building. Demolition activity would be limited to removal of seven permanent buildings, two modular buildings, and seven portable buildings, none of which are historical resources. The Main Building, including its associated landscape, would be retained during all phases of the Proposed

Project. The Proposed Project would result in alterations to the Main Building during Phase 4, which would involve interior renovations of the building. As discussed above, interior spaces in the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. Additionally, a one-story projecting volume (not associated with the historic design) at the building's northeast corner would be removed. The alterations proposed as part of Phase 4 would not materially impair those physical characteristics that convey the significance of the resource. Therefore, the Main Building would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark following the Proposed Project's implementation (ARG 2025).

Additionally, new buildings and outdoor spaces, including the Maker-Space building, classroom building, and cafeteria and culinary education building would not require demolition or alteration of the Main Building. The new classroom building would result in some changes to the immediate setting of the Main Building by introducing additional massing adjacent to the historical resource, but would not compromise the important spatial relationship that historically and currently exists between the Main Building and Montana Avenue. The sequence of entry from the street, through the lawn, and to the entrance of the Main Building would remain intact. Additionally, the new classroom building would not be physically attached to the Main Building. The Main Building would continue to retain its integrity of setting at the Proposed Project's completion (ARG 2025).

For the reasons stated above, the Proposed Project, as designed, would not result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5. For these reasons, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on historical resources.

As discussed in Section 4.5, records search results indicated that no previously conducted studies or previously recorded archaeological sites were identified within the boundaries of the Proposed Project campus, nor within one-quarter mile radius of the campus. As the campus has been previously developed and because of the low sensitivity for archaeological resources, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on archaeological resources. Implementation of mitigation measure **CUL-1** would further protect against the potential for the project to affect unknown buried resources during construction activities.

Energy

The geographic scope for evaluating cumulative energy impacts consists of the service areas for Southern California Edison and Southern California Gas, which are the electric and natural gas service providers for the Proposed Project site. The use of alternative fuels and renewable energy supplies are replacing conventional fossil fuel supplies, thereby contributing to cleaner energy sources. Development in the region has been incorporating more energy efficient design and fixtures to reduce energy consumption in compliance with State regulations, such as CALGreen. The District has also adopted and has been implementing its Sustainability Plan to improve energy efficiency in existing and new buildings and incorporate renewable technologies, such as solar

panels and provision of vehicle charging facilities. Therefore, a less-than-significant cumulative impact exists in the region with respect to energy.

As described under threshold 4.6-a, the Proposed Project would increase energy consumption for temporary construction activities related to vehicle use and material transport. However, construction activities would be temporary and would not increase long-term energy or fuel demand. The Proposed Project's energy consumption for building operation would support the State's goals to improve energy efficiency through complying with the California Building Code, providing solar readiness, and decreasing use of grid electricity. The Proposed Project would not develop uses or involve activities that would conflict with goals of: (1) decreasing per capita energy consumption, (2) decreasing reliance on oil (petroleum), and (3) increasing uses of renewable energy sources. Additionally, the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative energy impacts.

Geology and Soils

The geographic scope for evaluating geology and soils impacts is generally site-specific, rather than cumulative in nature. Potential cumulative impacts resulting from soil conditions would be minimized on a site-specific basis as needed via incorporation of standard construction methods and compliance with code requirements. Although Southern California is a seismically active region and is susceptible to various geologic hazards, new development is required to comply with applicable State and local building codes and site-specific geotechnical measures to reduce or avoid the potential to exacerbate existing or result in new geologic hazards. The Proposed Project is not considered to result in a cumulatively considerable contribution to cumulative impacts on geology and soils for these reasons.

The geographic scope for evaluating cumulative impacts on paleontological resources is the Southern California region. Many paleontological resources within the region have been previously destroyed prior to adoption of protective measures at the federal, State, and/or local levels or have been inadvertently destroyed during grading and excavation activities. Such conditions have resulted in the loss of scientific data. The Franklin Elementary School campus is located within an area that has been previously developed and is predominantly underlain by fill materials; however, the potential remains for the discovery of unknown paleontological resources during Proposed Project ground-related disturbance. Mitigation measure GEO-1 requires a pre-construction meeting to educate construction workers on the potential for paleontological resources. Mitigation measure GEO-2 would require paleontological monitoring during ground-disturbing activities and identifies specific procedures to be followed in the event of an unanticipated discovery of a paleontological resource. With implementation of mitigation measures GEO-1 and GEO-2, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on paleontological resources.

Greenhouse Gas Emissions

The geographic scope for evaluating cumulative GHG impacts is global. GHG emissions contributing to climate change and global warming are inherently a cumulative impact in the

context of CEQA. No single project alone would measurably contribute to an incremental change in the global average temperature, or to global, local, or microclimates. GHG emissions are attributable largely to the transportation sector and electricity generation from fossil fuel combustion. New development or operational characteristics from cumulative projects that contribute prominent GHGs contribute to a significant cumulative impact on GHGs.

As discussed in Section 4.8-a, GHG emissions from the Proposed Project would be below SCAQMD's 3,000 $MTCO_2e$ numerical threshold recommended for non-industrial projects and the adoption of sustainable design features by the District would further reduce emissions over the life of the Proposed Project. In addition, the Proposed Project would not conflict with State and local plans for reducing emissions from these activities and sources in order to meet its targets and goals for GHG reduction in 2030 and beyond. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to GHG emissions.

Hazards and Hazardous Materials

The geographic scope for evaluating cumulative hazards and hazardous materials impacts is the Franklin Elementary School campus and adjacent properties. The Franklin Elementary School campus is listed on the DTSC HWTS HAZNET database as a result of the disposal of asbestos containing waste in 1984 and 1994 during previous renovation and modernization efforts.

As discussed in Section 4.9, the Proposed Project, as well as other cumulative projects, are subject to local, state, and federal regulatory requirements to evaluate, disclose, and mitigate the potential for releases of hazardous materials into the environment prior to grading activities, if such conditions are suspected or known. Implementation of mitigation measure HAZ-1 would ensure that such materials would be properly removed, handled, and disposed of. With implementation of such mitigation, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to hazards and hazardous materials.

Hydrology and Water Quality

The geographic scope for evaluating cumulative hydrology and water quality impacts is the watershed within which Franklin Elementary School is located. Development within the watershed has the potential to contribute to increased stormwater runoff volumes and pollutant loads in the storm drain system that discharge to creeks and ultimately to the Pacific Ocean. However new development is required to conform with standard State and local drainage and grading regulations to control stormwater runoff and regulate water quality. New development occurring within the watershed would be required to demonstrate that stormwater volumes generated following improvement activities would be managed on-site, and that flooding would not be induced. New projects would be required to comply with applicable local, state, and federal regulations governing stormwater discharge during construction (e.g., NPDES Construction General Permit and SWPPP). Such projects would be subject to review and approval by the affected agencies to ensure that appropriate BMPs are implemented to reduce pollutants in stormwater and avoid adverse impacts to surface water quality. Through implementation of such

measures and project compliance on a project level, a less-than-significant cumulative impact exists within the watershed with respect to hydrology and water quality.

As described in Section 4.10, Hydrology and Water Quality, the Proposed Project would result in temporary and localized ground disturbance during construction. The District would be required to demonstrate compliance with NPDES requirements, including design, management, and monitoring in order to protect and maintain water quality and to reduce potential impacts related to storm water discharges during construction through implementation of BMPs. Further, the Proposed Project would result in a similar land use on-site as under existing conditions and would not substantially increase impervious surfaces. For these reasons, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to hydrology and water quality.

Land Use and Planning

The geographic scope for evaluating cumulative impacts related to land use and planning is the campus and immediate vicinity. Development projects within this area are reviewed for consistency with land use policies and zoning regulations to prevent impacts on the public and the environment from incompatible land uses.

As discussed in Section 4.11, the Franklin Elementary School campus is zoned for Institutional/Public Lands (PL) and the satellite campus is zoned Multi-Unit Low-Density Residential (R2), and is designated for Institutional/Public Lands (main school campus) and Low Density Housing (adjacent satellite facility) uses in the City's General Plan. Schools are allowable within these designations, as established in Section 9.15.010 of the City's Municipal Code. The Proposed Project would not change the existing land use of the campus and would comply with all applicable zoning regulations, including height standards. Therefore, the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Other development within the campus vicinity would be subject to the same land use polices and zoning regulations. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to land use and planning.

Noise

The geographic scope for evaluating cumulative noise impacts is the campus and immediate surroundings. Noise effects are localized by nature because noise attenuates with increasing distance from the source. The City has established standards to regulate noise levels and protect the public welfare.

The Proposed Project construction activities would result in increases in noise levels. These noise sources would be intermittent, temporary, and would cease at the end of the construction phase. With implementation of mitigation measure NOI-1, which requires multiple noise reducing measures, including equipping power construction equipment with noise shielding and muffling devices, implementation of a Construction Mitigation Plan, notification of property owners and occupants within 500 feet of the Proposed Project grading limits, placement of stationary

construction equipment such that emitted noise is directed away from sensitive receivers, etc., construction-related impacts from the Proposed Project would be reduced to levels that would not be cumulatively considerable. Additionally, mitigation measure NOI-2 would reduce potential vibrational effects from on-site use of construction equipment to a less than significant level. During operations, the Proposed Project would not increase vehicle trips nor increase stationary noise sources to a significant degree. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts relative to noise or vibration.

Transportation

The geographic scope for evaluating cumulative transportation impacts is the transportation network serving the campus. Continued development within the City of Santa Monica has contributed to increased use of the existing transportation network. However, State and local policies have been adopted to encourage the use of alternate modes of transportation, such as walking, bicycling, and taking public transit.

The proposed improvements would increase vehicle trips on the surrounding roadway network associated with construction worker commutes, haul trips, and the transportation of construction equipment. These trips would be distributed throughout the workday and across multiple roadways. Additionally, construction activities would be temporary and would not result in long-term increases in vehicle trips. The Proposed Project would not increase the existing capacity or enrollment of the schools and would not expand the school's geographic attendance zone. Thus, the Proposed Project would not generate permanent increases in vehicle trips and would not increase the vehicle miles travelled associated with the school. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to vehicle trips or vehicle miles traveled.

However, as the Proposed Project's site is located within a residential neighborhood, haul trucks and equipment deliveries to and from the Proposed Project's site throughout the day may increase hazards. Implementation of mitigation measure TR-1 would require the construction contractor to prepare and implement a Construction Traffic Mitigation Plan to address safety hazards, which would require the scheduling of construction staging and delivery outside of peak student pick-up/drop-off times, notifying students and parents on drop-off and pickup routes and procedures for each phase of construction (if different than the previous), and use of portable message and information signs at the construction areas, as needed. With implementation of mitigation measure TR-1, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to roadway hazards.

Tribal Cultural Resources

The geographic scope for evaluating cumulative impacts on tribal cultural resources is the geographic area that is traditionally and culturally affiliated with the Gabrieleño Band of Mission Indians - Kizh Nation. Past development of lands within the region has contributed to the loss and destruction of tribal cultural resources.

In accordance with AB 52 and PRC section 21080.3.1, the District sent formal notification letters to two Native American tribes that requested notification from the District (Torres Martinez Desert Cahuilla Indians and Gabrieleño Band of Mission Indians–Kizh Nation). No response was received from the Torres Martinez Desert Cahuilla Indians. Correspondence was received from the Gabrieleño Band of the Kizh Nation indicating that the Proposed Project's site is located within the Ancestral Tribal Territory of the Kizh Nation and that the tribe's Tribal Government was requesting to schedule consultation with the SMMUSD to discuss the Proposed Project and surrounding location in further detail. The SMMUSD met with representatives of the Kizh Nation on November 12, 2024. Based on the discussion, members of the Kizh Nation indicated they would forward correspondence to the SMMUSD with recommendations for potential measures to address potential discovery of unknown cultural resources during ground disturbing activities associated with construction of the Proposed Project. The SMMUSD subsequently contacted the Tribe to request the information noted; no further response was received.

Because the Proposed Project site has been fully developed since the 1930s and no known tribal cultural resources have been identified in the campus, it is not anticipated that tribal cultural resources would be encountered during construction-related ground disturbing activities; however, implementation of mitigation measures **TCR-1** to **TCR-3** would reduce Proposed Project impacts to a less than significant level. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to significant cumulative impacts on tribal cultural resources.

Utilities and Service Systems

The geographic scope for evaluating cumulative impacts on utilities and service systems is the City of Santa Monica. The City of Santa Monica is largely built out and existing infrastructure is generally able to serve the utility needs for new development throughout the City. New development continues to occur within the City and has resulted in an incremental increase in demands on water supply, stormwater drainage facilities, wastewater treatment, electricity, telecommunications, and solid waste disposal systems.

The Proposed Project would be required to comply with applicable regulations intended to increase water and energy efficiencies and reduce stormwater discharges and solid waste generation. Compliance with such measures would reduce potential demands from new development on existing utility providers.

Construction of the Proposed Project would result in the consumption of water, electricity, and natural gas in powering construction equipment and vehicles. Due to the scale of the improvements proposed, such demands are anticipated to be limited, while also being temporary. Operation of the Proposed Project would not result in an increase in student population or staff at the campus, and therefore, would not increase demands on utility providers in this regard. The Proposed Project would not require relocation or construction of new or expanded utilities to serve the proposed campus facilities. Proposed Project compliance with applicable State regulations (e.g., CALGreen) and Districtwide sustainability policies would further reduce water and energy consumption over the life of the project. As such, the Proposed Project is not

anticipated to result in a cumulatively considerable contribution to cumulative impacts relative to utilities and service systems.

Summary

The Proposed Project would not have impacts that are individually limited, but cumulatively considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects. All impacts would be less than significant, with or without mitigation incorporated. There would not be a mandatory finding of significance in this regard.

4.21-d Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings was considered in the response to certain questions in the following sections: aesthetics; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; noise; population and housing; transportation; and wildfire. As a result of this evaluation, no potential environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, were identified. Impacts would be less than significant.

As discussed in Section 4.9, Hazards and Hazardous Materials, based on the age of historical and current structures on the Proposed Project's site, there is the potential that hazardous materials may be present, consisting of arsenic (from building materials), lead (from lead-based paint), asbestos (from building materials), pesticides (from prior termite treatment), and PCBs (in window caulking). These compounds may be present in the shallow soils on-site, and based on their properties, do not have the tendency to migrate. As concluded in the Phase I ESA, it is recommended that a limited Phase II subsurface investigation be conducted in areas of proposed soil disturbance to evaluate shallow soil conditions with respect to the chemicals of concern listed above. Thus, the Proposed Project would incorporate mitigation measure **HAZ-1** which would require preparation of a Phase II subsurface investigation, followed by remediation as applicable based on the results of the Phase II Investigation. As hazardous materials may be present in shallow soils, the remediation activities are expected to consist of removing any affected soils and hauling them to an appropriate landfill. With implementation of such mitigation, potential environmental effects that may cause effects on human beings, either directly or indirectly, would remain less than significant. Therefore, there would not be a mandatory finding of significance in this regard.

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