ASCENT

DRAFT INITIAL STUDY/PROPOSED
MITIGATED NEGATIVE DECLARATION FOR THE

Will Rogers Learning Community Campus Expansion and Improvement Project

Prepared for:

SMMUSD

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

November 2022

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Santa Monica-Malibu Unified School District
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LIST OF ABBREVIATIONS

°C	degrees Celsius
AB	Assembly Bill
ACM	asbestos-containing materials
ADA	American with Disabilities Act
ALUC	Airport Land Use Compatibility
AQMP	air quality management plans
Basin Plan	Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties
Basin	South Coast Air Basin
BBB	Big Blue Bus
bgs	below ground surface
BMP	best management practices
BP	Board Policy
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalOSHA	California Division of Occupational Health and Safety
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBSC	California Building Standards Commission
CDOC	California Department of Conservation
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Division of Mines and Geology
CHPS	Collaborative for High Performance Schools
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon-dioxide-equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
District	Santa Monica-Malibu Unified School District
DSA	Division of the State Architect
DTSC	Department of Toxic Substances Control
ECHO	Enforcement and Compliance History Online
EIR	Environmental Impact Report
EMS	Energy management systems
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System

FIRM	Flood Insurance Rate Maps
FSI	Fareless System Initiative
FTA	Federal Transit Administration
GHG	greenhouse gases
GPF	gallon per flush
GSP	Groundwater Sustainability Plan
H_2S	hydrogen sulfide
HRI	Historic Resources Inventory
HWTS	Hazardous Waste Tracking System
I-10	Interstate 10
in/sec	inches per second
IS/Proposed MND	Initial Study/Proposed Mitigated Negative Declaration
kWh	kilowatt hours
LBP	lead-based paint
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Continuous Sound Level
L_{max}	Maximum Sound Level
L_{min}	Minimum Sound Level
LOS	level of service
LST	localized significance thresholds
MBTA	Migratory Bird Treaty Act
Metro	Metropolitan Transportation Authority
MLD	most likely descendant
MODE	Mobility On Demand Every Day
mph	miles per hour
MPO	metropolitan planning organization
MRZ	Mineral Resource Zones
$MTCO_2e$	metric tons of carbon dioxide equivalent
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NO_2	nitrogen dioxide
NV5	Alta Environmental DBA NV5
O_3	ozone
OCP	organochlorine pesticides
OPR	Office of Planning and Research
PCB	polychlorinated biphenyls
PL	Institutional/Public Lands
PM_{10}	Respirable particulate matter
$PM_{2.5}$	Fine particulate matter
PPV	peak particle velocity
PRIMP	Paleontological Resources Impact Mitigation Program
Proposed Project	Will Rogers Campus Plan Project

RCRA	Resource Conservation and Recovery Act
REC	recognized environmental conditions
RMS	root-mean-square
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SMBGSA	Santa Monica Basin Groundwater Sustainability Agency
SMFD	Santa Monica Fire Department
SMMC	Santa Monica Municipal Code
SMMUSD	Santa Monica-Malibu Unified School Districts
SMPD	Santa Monica Police Department
SO_2	sulfur dioxide
SR	State Route
SRA	source receptor area
STEM	Science, Technology, Engineering, and Math
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TIMS	Transportation Injury Mapping System
TTCP	Temporary Traffic Control Plan
UWMP	Urban Water Management Plan
VdB	Vibration Decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
WDR	Waste Discharge Requirements
ZNE	Zero Net Energy

1 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study/Proposed Mitigated Negative Declaration (IS/Proposed MND) has been prepared by the Santa Monica-Malibu Unified School District (District) to evaluate potential environmental effects resulting from Will Rogers Learning Community Campus Expansion and Improvement Project (Proposed Project). Chapter 2, "Project Description" presents the detailed Proposed Project information.

This document has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations section 15000 et seq.). An initial study is prepared by a lead agency to determine if a project may have a significant effect on the environment (State CEQA Guidelines section 15063[a]), and thus to determine the appropriate environmental document. In accordance with State CEQA Guidelines section 15070, a "public agency shall prepare…a proposed negative declaration or mitigated negative declaration…when: (a) The Initial Study shows that there is no substantial evidence…that the project may have a significant impact on the environment, or (b) The Initial Study identifies potentially significant effects but revisions to the project plans or proposal are agreed to by the applicant and such revisions would reduce potentially significant effects to a less-than-significant level." In this circumstance, the lead agency prepares a written statement describing its reasons for concluding that the project would not have a significant effect on the environment and, therefore, does not require the preparation of an Environmental Impact Report (EIR). By contrast, an EIR is required when the project may have a significant environmental impact that cannot clearly be reduced to a less-than-significant effect by adoption of mitigation or by revisions in the project design.

1.2 WHY THIS DOCUMENT?

As described in the environmental checklist (Chapter 3), the project would not result in any unmitigated significant environmental impacts. Therefore, an IS/Proposed MND is the appropriate document for compliance with the requirements of CEQA. This IS/Proposed MND conforms to these requirements and to the content requirements of State CEQA Guidelines section 15071.

Under CEQA, the lead agency is the public agency with primary responsibility over approval of the project. The District is the CEQA lead agency. The purpose of this document is to present to decision-makers and the public information about the environmental consequences of implementing the project. This disclosure document is being made available to the public for review and comment. This IS/Proposed MND will be available for a 30-day public review period from November 14, 2022 to December 14, 2022.

Supporting documentation referenced in this document is available for review at:

Santa Monica-Malibu Unified School District, Main Office
1651 16th Street
Santa Monica, CA 90404

Will Rogers Learning Community, Main Office
2401 14th Street
Santa Monica, CA 90405

https://www.smmusd.org/Page/5598

Comments should be addressed to:

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405

E-mail comments may be addressed to: cupton@smmusd.org

If you have questions regarding the IS/Proposed MND, please call Carey Upton at: (310) 450-8338 x79383. If you wish to send written comments (including via e-mail), they must be postmarked by December 14, 2022.

After comments are received from the public and reviewing agencies, the District may (1) adopt the MND and approve the project; (2) undertake additional environmental studies; or (3) abandon the project. If the Proposed Project is approved and funded, the District may proceed with the Proposed Project.

1.3 SUMMARY OF FINDINGS

Chapter 3 of this document contains the analysis and discussion of potential environmental impacts of the project.

Based on the issues evaluated in that chapter, it was determined that the project would have either no impact or a less-than-significant impact related to most of the issue areas identified in the Environmental Checklist, included as Appendix G of the State CEQA Guidelines. These include the following issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Potentially significant impacts were identified for biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, and transportation; however, mitigation measures included in this IS/Proposed MND would reduce all impacts to a less-than-significant level.

1.4 ENVIRONMENTAL PERMITS AND APPROVALS

In addition to District Board of Education approval of the Proposed Project and adoption of the MND, the project would require permits and approvals from the Division of the State Architect, State Water Resources Control Board, and City of Santa Monica. These permits are described in Chapter 2 "Project Description."

1.5 DOCUMENT ORGANIZATION

This IS/Proposed MND is organized as follows:

Chapter 1: Introduction. This chapter provides an introduction to the environmental review process. It describes the purpose and organization of this document as well as presents a summary of findings.

Chapter 2: Project Description and Background. This chapter describes the project location and existing setting, identifies project objectives, and provides a detailed description of the project.

Chapter 3: Environmental Checklist. This chapter presents an analysis of a range of environmental issues identified in the CEQA Environmental Checklist (CEQA Guidelines, Appendix G) and determines if project actions would result in no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact. If any impacts were determined to be potentially significant, an EIR would be required. For this project, however, none of the impacts were determined to be significant after implementation of mitigation measures.

Chapter 4: References. This chapter lists the references used in preparation of this IS/Proposed MND.

Chapter 5: List of Preparers. This chapter identifies report preparers.

2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The Santa Monica-Malibu Unified School District (SMMUSD or District) is proposing to expand the campus and make improvements to the Will Rogers Learning Community based on the 2020 Campus Master Plan (District 2020). The Campus Master Plan was developed to identify campus modernization efforts needed to align with the District's educational specifications. These redevelopment and modernization efforts include creating new indoor and outdoor spaces that promote collaboration, project-based learning, and the Science, Technology, Engineering, and Math (STEM) curriculum, while improving safety and access for the campus and surrounding community. Of the overall campus-wide modernization efforts identified in the Campus Master Plan, the District has identified one priority construction project that is currently funded and three future long-range projects to be performed as funding becomes available (Proposed Project). The Campus Master Plan identifies several other modernization efforts that are not currently proposed for implementation and are not reasonably foreseeable at this time.

Overall, the Proposed Project would result in the addition of the property located at 1515 Maple Street to campus and the removal/demolition of 16 portable and permanent buildings, construction of three new buildings, renovation and reuse of eight existing buildings (classrooms and cafetorium) and outdoor spaces, and reconfiguration of outdoor and parking/transportation areas over an approximate span of 10 to 15 years. Phase 1, which is currently funded, includes removal of six existing portable classrooms and one existing restroom building, construction of a new one-story early education classroom building and associated play yards, and construction of a new play field. Subsequent phases would be constructed as funding becomes available and would include removal of five additional existing modular classrooms, removal of four one-story classroom buildings, expansion and reconfiguration of an existing parking lot, construction of a new student drop-off/pick-up area, repurposing existing classrooms into STEM classrooms, repurposing outdoor spaces into outdoor classrooms, construction of a new multipurpose room/food services facility, installation of a learning garden, construction of a new parking lot, and construction of a new two-story classroom building. These improvements are described in more detail in Section 2.5, "Project Improvements."

2.2 PROJECT LOCATION

The Proposed Project site encompasses the existing Will Rogers Learning Community campus, which is an approximately 6.7-acre elementary school campus located at 2401 14th Street in Santa Monica, California (Assessor's Parcel Number 4284-038-900) and the addition of the District's approximately 0.55-acre property located at 1515 Maple Street (Assessor's Parcel Number 4284-038-901). The campus is bordered to the southwest by 14th Street, to the northeast by 16th Street, and to the northwest and southeast by residential housing. See Figure 2-1 for the regional location and Figure 2-2 for the campus location.

Major highways in proximity to the campus include Interstate 10 and California State Route 1, located approximately 0.6-mile northwest and 0.5 mile southwest of the campus, respectively. The existing campus is designated as Institutional/Public Lands in the City's General Plan and is zoned as Institutional/Public Lands (PL) by the City, while the proposed expansion parcel at 1515 Maple Street is designated as Low Density Housing in the City's General Plan and is zoned Low Density Residential (R2) by the City (City of Santa Monica 2021a and 2021b) (Figure 2-3).

2.3 SURROUNDING LAND USES

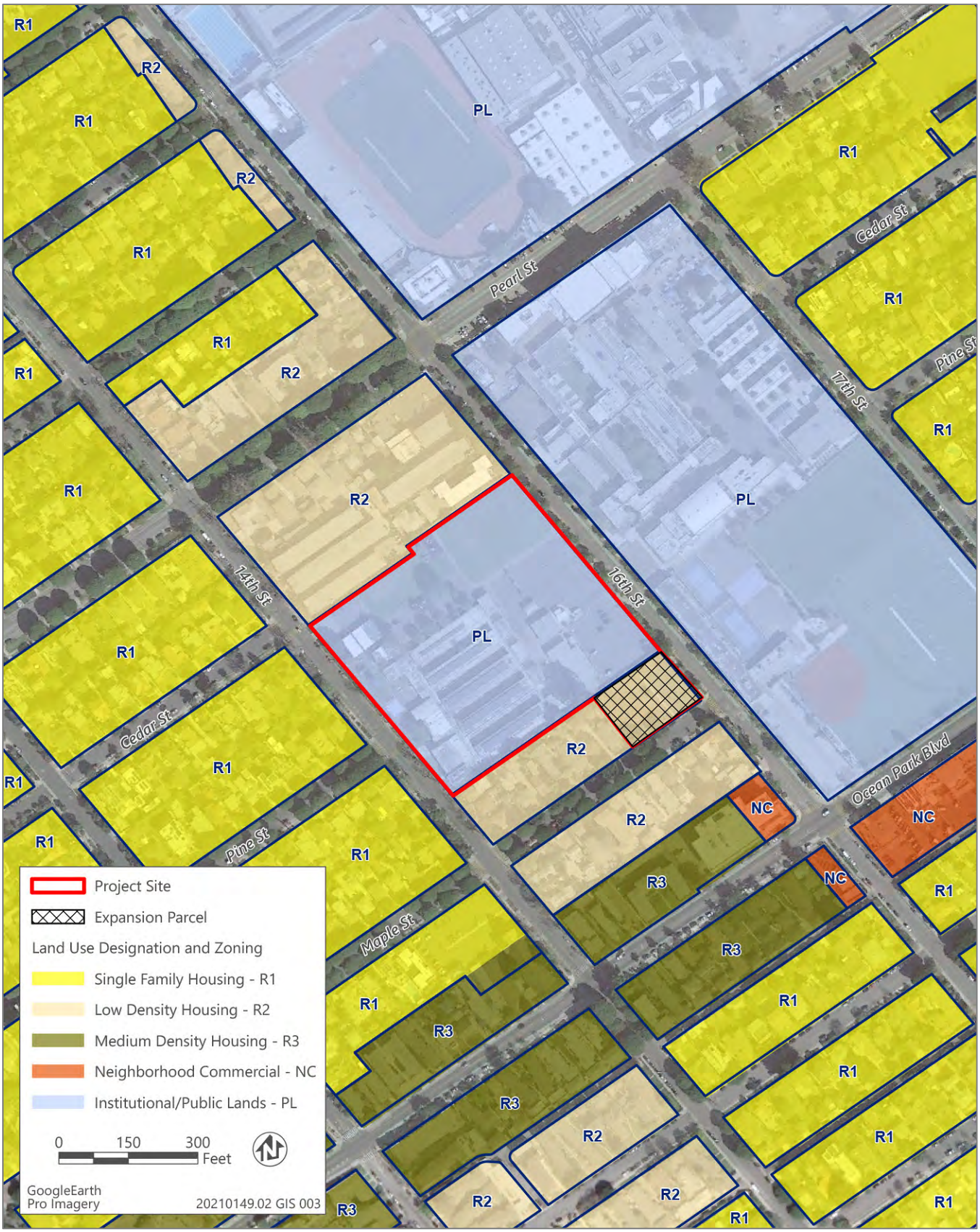
The area surrounding the campus is primarily developed with public/institutional and residential land uses (see Figure 2-3). John Adams Middle School is located to the northeast of the campus, across from 16th Street. Santa Monica College is located further northeast of the campus, along the intersection of 16th Street and Pearl Street. Low-density residential housing is located immediately adjacent to the campus to the northwest and southeast. Neighborhood commercial uses, including retail stores, restaurants, markets, and offices, are located further southeast of the campus, along Ocean Park Boulevard. Across from 14th Street to the southwest of the campus are single family residences.

Source: Adapted by Ascent Environmental in 2021.

Figure 2-1 Regional Location

Source: Adapted by Ascent Environmental in 2022.

Figure 2-2 Project Location and Surrounding Land Uses



Source: Data downloaded from the City of Santa Monica in 2021; adapted by Ascent Environmental in 2022.

Figure 2-3 General Plan Land Use Designations and Zoning

Source: Image by Johnson Favaro in 2022.

Figure 2-4 Existing Campus Facilities with Historic District Boundary

2.4 EXISTING SETTING

The Will Rogers Learning Community campus currently consists of 14 permanent buildings, 11 portable buildings, three parking lots, three play fields, and playgrounds on approximately 6.7 acres. Figure 2-4 shows the existing campus facilities onsite. The campus serves students attending preschool through fifth grade. Current 2021-2022 student enrollment is 398 students, with the highest enrollment occurring in 2015-2016 at 564 students. The expansion parcel located at 1515 Maple Street is approximately 0.55 acres and contains a gravel parking lot and a garden.

Of the overall campus, the existing buildings comprise approximately 1.2 acres (19 percent) and are concentrated in the southwest portion of the campus. The buildings are single-story and consist of approximately 49,670 assignable square feet (ASF). The permanent buildings were initially constructed in 1948 and 1950, with subsequent updates to these buildings occurring in the 1970s. The portable buildings were added in the 1990s. Renovations were completed at the school from 1992 to 2001 and modernization from 2016 to 2021. The remaining campus areas consist of approximately 2.7 acres of playgrounds and fields (41 percent), 1.2 acres of unprogrammed landscaping and open space (17 percent), 0.9 acre of pedestrian walkways (13 percent), and 0.7 acre of onsite driveways and parking areas (10 percent). Fields, courts, playgrounds, and open space are distributed along the north and east sides of the campus. The existing athletic facilities at the school are available for community use through the Civic Center Act and joint use agreements between the District and the City. Vehicular access is currently provided from 14th Street and 16th Street, with student drop-off/pick-up occurring along 14th Street in front of the main campus entrance. There are two separate parking lots off 14th Street and 16th Steet that can accommodate up to 79 vehicles.

In 2021, the District adopted two policies to establish procedures for the treatment of historical resources on district campuses (BP and AR 7113). The District committed to create an inventory of historical resources on its school campuses prior to approval of a master plan or school facilities project. In 2022, the District commissioned an Historical Resources Inventory (HRI) of the Will Rogers Learning Community campus (Historic Resources Group 2022). The purpose of the HRI was to determine if historic resources, as defined in CEQA Guidelines Section 15064.5 and Board Policy 7113 on historical resources, are present on the campus. The HRI was completed in accordance with the procedures adopted in BP and AR 7113 for the identification of historical resources at school facilities, as well as their recordation in HRI reports. Based on visual observation of the campus, research of primary and secondary sources, and an analysis of the eligibility criteria for listing at the federal, state, and local levels, the HRI identified a historic district at Will Rogers Learning Community that is eligible for listing in the California Register of Historical Resources and for designation as a City of Santa Monica historic district (see Figure 2-4). The historic district consists of 13 contributing buildings, three site features, and one additional feature with a period of significance from 1948 to 1950. Additional information regarding the historic district is provided in Section 3.5, "Cultural Resources." Contributors to the historic district are shown below in Table 2-1.

Table 2-1 Historic District Contributing Resources

Feature	Contributing Resources	
Buildings	Building A (1948) Buildings B/C (1948) Building D (1948) Building E (1948) Building F (1948) Building G (1948) Building H (1948)	Building J (1948) Building K (1950) Building L (1948) Building M (1950) Building N (1950) Building P (1950)
Site Features	Courtyards (1948) 14th Street Quad (1948) Stone Planters (c. 1948)	
Additional Features	"Will Rogers Elementary School" Sign (c. 1948)	

Source: Historic Resources Group 2022.

2.5 PROJECT BACKGROUND AND NEED

The Santa Monica-Malibu Unified School District (SMMUSD or District) Board adopted Districtwide Educational Specifications (April 2019) that provide guidance on developing future learning environments to support new developments in technology and the expectations of the twenty-first century work force (District 2019a). The Educational Specifications shift the instructional design of the past that was defined by a traditional teacher-at-the-front-of-the-classroom style of learning to one that provides for rotational learning within the classroom, 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 Education Specifications also call for larger classrooms, more and larger multipurpose rooms, and several new shared spaces which do not currently exist. The redesigned campus would have more square feet of interior space, and likely need to make use of two-story buildings to save space for outdoor activities.

Following adoption of the Educational Specifications, the District assessed the Will Rogers Learning Community campus and identified priority and future improvements to be performed in accordance with the Educational Specifications guidance. The campus assessment was a result of collaboration between SMMUSD administration leadership, Will Rogers Learning Community administration, faculty, staff, and parents, as well as the campus community at large. These improvements provide the basis for the long-range SMMUSD Will Rogers Elementary School Campus Master Plan (September 1, 2020). This report presented a draft long-term test fit for the campus to implement the goals of the Educational Specifications. The long-term test fit was further assessed alongside other district priorities and realities, including the need for recreational/open space, budget, scheduling, phasing, and the historical resources analysis. Following Board Policy 7113, adopted in February 2021, a Historic Resources Report was completed by Historic Resources Group. Following this additional analysis and site/community meetings, the Board of Education defined the scope of the Proposed Project.

The primary goal of these planning efforts was to understand and scope candidate projects that could be implemented with existing Measure SMS bond funds passed by Santa Monica taxpayers in 2018, while also establishing those improvements as the first series of projects that would be implemented as part of the long-term redevelopment of the campus.

2.6 PROJECT OBJECTIVES

Section 15024(b) of the CEQA Guidelines requires a project description to include a clear statement of objectives that address the underlying purpose of the project, including any project benefits. The following project objectives have been identified for the Proposed Project:

- Redevelop and renovate the Will Rogers Learning Community campus to accommodate a population of up to 650-700 students and provide properly sized learning environments in accordance with the 2019 SMMUSD Education Master Plan and Educational Specifications.
- Improve learning by replacing undersized and inflexible facilities with adequately sized, functional, and flexible spaces that accommodate modern and diverse learning styles and allow for variable uses.
- Provide enhanced, modern, and functional support spaces, such as cafeterias, labs, maker spaces, and other student services that promote whole child development.
- Improve the arts and athletic facilities in support of both the school and the community's educational, cultural, and recreational enhancement.
- Address noise, safety, and visibility issues by relocating play areas to the center of campus away from adjacent streets and residential neighbors.
- Improve access, circulation, and drop-off and pick-up as well as increase on-campus parking in a manner that improves pedestrian and vehicle safety by expanding and relocating parking lots to the outer edges of the campus.

- Establish a logical and fiscally feasible sequence of phased development.
- Ensure that the campus remains whole and fully functional at the end of each phase.

2.7 PROJECT IMPROVEMENTS

The following sections include a detailed description of the various Proposed Project components beyond the expansion of the campus, which would be developed over the course of four phases. The funding for Phase 1 has been identified, with construction anticipated to begin in 2023 and last for approximately 19 months. Phases 2, 3 and 4 would occur at the District's discretion when funding becomes available. At this time, no funding source has been identified for Phases 2, 3 and 4. As such, the timing of these two future phases is unknown at the time of preparation of this IS/Proposed MND. Table 2-2 includes a summary of the project features by phase. Figures 2-5 through 2-8 show the proposed site plan by phase, and Figures 2-9 through 2-11 depict renderings of the various proposed facilities. Note that Figures 2-5 through 2-8 show the improvements of each prior phase as an existing improvement in the site plan key.

Table 2-2 Project Features

Phase	Existing Features to be Removed	New Features to be Constructed	Existing Structures to be Renovated and Reused
1	▶ Remove six portable buildings (P1 to P6) ▶ Remove part of the existing play field and playground in north corner of campus ▶ Remove restroom building	▶ Construct new 16,985-square foot (sf) early education (K and T-K) classroom building and 6,475 sf open-to-sky play yard in northeast corner of campus ▶ Construct sf 41,750 sf of new field, track, playgrounds, and landscaping in center of campus	▶ None
2	▶ Remove part of the existing play field, garden, playgrounds, and small parking lot along the northwest edge of campus ▶ Remove the existing parking lot adjacent to modular classrooms Q-U at the southeast corner of campus	▶ Construct new 30,000-sf parking lot and vehicular turnaround for student drop-off and pick-up along the northwestern campus boundary ▶ Expand the playground area at the southeast corner of campus (i.e., at the current location of the existing parking lot and field)	▶ Repurpose existing kindergarten classrooms (Buildings B and D) into two new 1,630-sf STEM classrooms ▶ Renovate Buildings B and D to accommodate vertically retracting glass doors opening onto adjacent new outdoor classroom spaces ▶ Renovate the courtyard areas between existing Buildings E, F, G, H, and J to become outdoor classrooms
3	▶ Remove part of the existing parking lot at the corner of 16th Street and Maple Street and playground in the southeast corner of campus	▶ Construct a new 8,000-sf multipurpose culinary café and 2,000-sf lunch shelter ▶ Retain and repair remainder of the existing parking lot at the corner of 16th Street and Maple Street	▶ Repurpose existing kitchen and servery (Building A) for faculty or auditorium support ▶ Renovate the existing learning garden
4	▶ Remove part of the existing playground in the northwest corner of the campus. ▶ Remove existing Buildings K, M, N, and P ▶ Remove existing modular buildings Q, R, S, T and U	▶ Construct a new two-story 28,000-sf classroom building in the northwest corner of campus.	▶ None

2.7.1 Phase 1 – Early Education Classroom and Play Field

EARLY EDUCATION CLASSROOM BUILDING

The existing early education and kindergarten classrooms are located in portable Buildings P3 through P6 and Building D in the northwest corner of the campus along 14th Street (see Figure 2-4). As part of Phase 1, portable Buildings P3 through P6 would be removed and a new single-story, 16,985-sf classroom building would be constructed, which would consist of three transitional kindergarten (T-K) classrooms and four kindergarten classrooms (see Figure 2-5). The classrooms would be designed with windows and garage door-style wall panels that open to an early education outdoor play yard along the north side of the new classroom building. The classroom building and play yard would be shielded from adjacent residential neighbors to the north by an 8-foot wall and landscaping, which would be installed along the border of the proposed parking lot that would be developed during Phase 2, as described in Section 2.6.2, "Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area," below. Building D would be maintained in place to allow these classrooms to be repurposed into STEM classrooms as part of Phase 2, also described in Section 2.6.2, "Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area," below.

PLAYFIELD

A portion of the existing playfield and playground at the northeast corner of the campus would be removed and a new playfield would be constructed in a more central location on the east side of the campus along 16th Street. The existing portable buildings P1 and P2, as well as the restroom building in this area, would also be removed (see Figure 2-5). In addition, existing playgrounds would be reconfigured to accommodate the new playfield. The new play field would consist of artificial turf and a track and would span an area of approximately 26,500sf. Lighting would be installed at the new playfield for the campus' emergency safe dispersal area. New trees and landscaping are planned in areas adjacent to 16th Street and at ends of the new basketball courts, along with shaded benches at key tree locations. Following construction, these facilities would be available for community use through the Civic Center Act and joint use agreements with the City of Santa Monica, similar to existing conditions.

STORMWATER MANAGEMENT

Stormwater management facilities would be installed to accommodate percolation and/or retention onsite in accordance with city, county, and state standards. The District is currently conducting percolation tests to determine whether stormwater could be infiltrated onsite. If water infiltration is not feasible, two drywells would be installed for the campus – one in the playground area, and one in the northwest portion of the campus – and the District would pay a Runoff Reduction Fee to the City.

2.7.2 Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area

STEM MAKER SPACE CLASSROOMS

Two existing kindergarten classrooms in Building D along 14th Street would be repurposed into new STEM classrooms totaling approximately 3,260 sf, with each classroom totaling approximately 1,630 sf. The existing restrooms and workrooms for these classrooms would be maintained in place. The classrooms in Buildings B and D would be renovated with vertically retracting glass doors that open to an existing central courtyard. The existing courtyard between the two classrooms would be enclosed with a new wall to create an approximately 3,930-sf outdoor STEM classroom and courtyard garden. The outdoor classroom would be available for STEM demonstration purposes and for community use after school hours.

Source: Image by Johnson Favaro in 2022.

Figure 2-5 Proposed Site Plan – Phase 1

Source: Image by Johnson Favaro in 2022.

Figure 2-6 Proposed Site Plan – Phase 2

Source: Image by Johnson Favaro in 2022

Figure 2-7 Proposed Site Plan – Phase 3

Source: Image by Johnson Favaro in 2022

Figure 2-8 Proposed Site Plan – Phase 4

Source: Image by Johnson Favaro in 2022.

Figure 2-9 Early Education Classroom Building and Play Field

Source: Image by Johnson Favaro in 2021.

Figure 2-10 STEM Maker Space Classrooms

Source: Image by Johnson Favaro in 2021.

Figure 2-11 Outdoor Classrooms

OUTDOOR CLASSROOMS

Phase 2 would also include improvements to the underutilized outdoor spaces adjacent to existing classrooms (Buildings E, F, G, H, and J) in the southwest portion of the campus. The courtyard areas between existing Buildings E, F, G, H, and J would be renovated to become outdoor classrooms. The new outdoor classroom spaces would consist of paved areas that can accommodate outdoor tables and chairs and would be covered with new permanent awnings. The new outdoor classroom spaces would also include landscaped gardens and play areas consisting of turf or other resilient play surface.

PARKING, DROP-OFF/PICK-UP, AND PLAYGROUNDS

As described in Section 2.6.1, "Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area," above, a portion of the existing play field would be relocated from the north side of the campus during Phase 1 (see Figure 2-5). As part of Phase 2, portions of the existing play field, garden, playgrounds, and small parking lot along 14th Street in the northwest edge of campus would be removed. Additionally, the existing parking lot adjacent to modular classrooms Q-U at the southeast corner of campus would also be removed in this phase. In this same location, the playground area adjacent to the new central playfield would be expanded. The remaining portion of the existing parking lot along 14th Street in the northwest portion of the campus would be reconfigured and expanded into the area of the former play fields and playgrounds. The new parking lot would be approximately 30,000 sf with up to 80 parking spaces, including early education, visitor, and accessible parking spaces. The parking lot would connect 14th Street and 16th Street, with vehicle entrances and exits at each street and a vehicle turnaround in the center that would serve as a new student drop-off and pick-up area.

2.7.3 Phase 3 – Multipurpose Culinary Café, Learning Garden, and Parking

During Phase 3, food services operations would be relocated from the school's auditorium (Building A) in the southwest corner of the campus to a new food services facility in the southeast corner of the campus. The new food services facility would consist of an approximately 8,000-sf multipurpose culinary café and 2,000-sf lunch shelter. A portion of the existing parking lot at the corner of 16th Street and Maple Street as well as a portion of the playground would be removed to accommodate the new food services facility. The existing kitchen and servery in Building A would be maintained in place and repurposed for faculty or auditorium support uses. In addition, the existing learning garden in the southeast corner of the campus would be renovated under this phase. The remainder of the existing parking lot at the corner of 16th Street and Maple Street would be retained and repaired. This parking lot would continue to be accessed from 16th Street and would include up to 18 parking spaces.

2.7.4 Phase 4 – Elementary Classroom Building

During Phase 4, part of the existing playground in the northwest corner of the campus would be removed. In its place, a new two-story, 28,000-sf building with 10 classrooms serving grades 1-5 would be constructed in the northwest portion of the campus. The playground currently at this location would be relocated to the area south of the new play field, expanding on the playground developed as part of Phase 2. In addition, this phase includes the demolition of existing Buildings K, M, N, and P, and modular Buildings Q, R, S, T and U.

2.8 PROJECT CONSTRUCTION

The Proposed Project would be constructed in four phases, with construction activities anticipated to begin in June 2023 and end in December 2030. The approximate timing for construction of each phase is summarized in Table 2-3. Although the exact timing for implementation of each phase is currently unknown, the following dates were selected

for the purpose of evaluating the Proposed Project's environmental impacts, using reasonable assumptions based on the District's best estimates at this time.

Table 2-3 Construction Phasing

Phase	Construction Start Date	Completion Date	Duration
Phase 1 – Early Learning Classroom and Play Field	June 2023	December 2024	19 months
Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area	January 2025	December 2025	12 months
Phase 3 – Multipurpose Culinary Café, Learning Garden, and Parking	June 2026	December 2027	18 months
Phase 4 – Elementary Classroom Building	June 2029	December 2030	18 months

Source: Provided by Santa-Monica Malibu Unified School District in 2022.

Overall, construction of the Proposed Project is estimated to result in excavation to a maximum depth of 5 feet, involve 5.34 acres of ground disturbance, result in a net decrease in impervious surface area by 0.64-acre, and generate 25,900 cubic yards of solid waste. Table 2-4 includes a summary of assumptions regarding maximum excavation depth, acres of ground disturbance, net change in impervious surface area, and construction-related solid waste generated for each phase of the Proposed Project.

Table 2-4 Construction Assumptions

Phase	Maximum Excavation Depth (feet)	Area of Ground Disturbance (acres)	Net Change in Impervious Surface Area (acres)	Solid Waste Generated (cubic yards)
Phase 1 – Early Education Classroom and Play Field	5	1.6	-0.43	7,800
Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area	5	2.54	+0.06	12,300
Phase 3 – Multipurpose Culinary Café, Learning Garden, and Parking	5	0.54	+0.06	2,600
Phase 4 – Elementary Classroom Building	5	0.66	-0.33	3,200
Total	--	**5.34**	**-0.64**	**25,900**

Source: Provided by Johnson Favaro in 2022.

Construction activities would involve demolition, building construction, site preparation, grading, and architectural coating. Because the site is relatively flat, it is anticipated that only minor grading would be required. All construction equipment staging would occur within the boundaries of the school site, specifically within the area between the north side of the new early learning classroom building and the northern property line. Refer to Appendix A for details regarding the types of construction equipment that are expected to be used, the number of workers that would be involved, and the anticipated duration of each activity. In accordance with South Coast Air Quality Management District standards, the District would require all construction contractors to utilize equipment with Tier 4 engines.

The Will Rogers Learning Community campus would remain open and continue operations during construction activities. Santa Monica Municipal Code Section 4.12.1.110 limits construction to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday. Construction is not allowed on Sundays or on holidays. The City may grant the District a waiver to allow construction to occur from 7:00 a.m. to 5:00 p.m. The District would be required to follow this code and any allowances made by the City. This waiver is needed to improve safety and congestion, allowing the contractor to arrive and begin before major drop-off of students.

As described in Section 2.4, "Existing Setting," 13 contributing buildings, three site features, and one additional feature were identified as contributors to a historic district at Will Rogers. The Proposed Project would involve the rehabilitation and adaptive reuse of the following contributing buildings and features: Buildings A, B, and D; and linear courtyards between and adjacent to Buildings E, F, G, H, and J. The District adopted Board Policy (BP) 7113 on

February 9, 2021, which outlines objectives and establishes procedures for the treatment of historical resources on district campuses. In compliance with BP 7113, the rehabilitation and adaptive reuse of identified historical resources on the Will Rogers campus would be consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation*.

2.9 OPERATIONS

The Proposed Project would not result in any changes to the existing operations of the school, nor would it increase the school's capacity or change its attendance boundaries. Rather, the improvements would provide larger facilities to accommodate the same number of students and staff in accordance with the District's Educational Specifications. Upon completion of the Proposed Project, the new play field would be available for community use through the Civic Center Act, as well as joint use agreements between the District and the City, similar to existing conditions. The project does not propose any changes to the frequency or duration of use of the playfields on the campus. As under existing conditions, the play field would not be lighted.

In addition, the existing main campus entrance along 14th Street would be maintained. As described in Section 2.7.2, a new parking lot with a pick-up and drop-off area would be established along the northwest boundary of the campus with vehicle ingress/egress provided at 14th Street and 16th Street. The proposed parking lot off 16th Street described in Section 2.7.2 would also serve as another campus entrance.

The Districtwide Plan for Sustainability includes current initiatives and recommended strategies to reduce energy consumption and greenhouse gas emissions from the District's school campuses (District 2019b). New buildings and major renovations would be designed to meet the most current Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Energy Code) and exceed the District's Collaborative for High Performance Schools (CHPS) minimum criteria by 25 percent. The CHPS criteria includes design considerations for topics that include energy and water efficiency; daylighting opportunities; the use of use of recycled, regional, and low-carbon impact building materials; indoor environmental and air quality; building orientation and envelope design; stormwater collection and treatment; and pollution minimization. In accordance with these programs, the proposed facilities would include the following sustainability features:

- New buildings would be designed to allow for the future installation of solar panels. If solar panels are not installed in the future, the District would opt to receive a higher tier of sustainable energy supplies to ensure a similar reduction in the use of fossil fuels. The District is currently receiving the lean power rate, which is comprised of 36 percent clean energy.
- Landscaping would consist of drought-tolerant and native plants that support local biodiversity and minimize water use.
- Occupancy sensors would be installed in all classrooms and offices to allow lights to be shut off when unoccupied.
- New HVAC units, lighting, and equipment would meet or exceed Title 24 standards.
- Wireless thermostats would be installed for new HVAC units to allow the District to implement energy saving strategies, such as thermostat lockout temperatures and occupied/unoccupied scheduling.
- Energy management systems (EMS) would be installed to allow control on the campus. Wireless thermostats would be connected to the EMS system.
- Faucet aerators and showerheads would be upgraded with high-efficiency alternative.
- Domestic plumbing fixtures would be replaced with high-efficiency fixtures, including:
    - 0.125 gallon per flush (GPF) models for urinals;
    - 0.8 GPF models for tank toilets;
    - 1.1 or 1.26 GPF models for flush valve toilets;

- Additional bike racks would be installed to accommodate a minimum of 10 percent of regular building occupants, with a goal to reach 20 percent capacity by 2030;
- Buildings would incorporate Collaborative for High Performance Schools (CHPS) Green Building Resolution Standards; and
- Stormwater percolation and/or retention facilities would be incorporated in accordance with city, county, and state requirements.

2.10 POTENTIAL PERMITS AND APPROVALS REQUIRED

The District is the lead agency for the Proposed Project under the California Environmental Quality Act (CEQA). Table 2-5 includes a summary of the anticipated permits and approvals required for the project.

Table 2-5 Required Permits and Approvals

Agency	Approval/Permit
District Board of Education	Approval of the Proposed Project, adoption of the MND, and adoption of the Mitigation Monitoring and Report Program (MMRP)
Division of the State Architect	Approval of the construction drawings
State Water Resources Control Board	Issuance of the National Pollution Discharge Elimination System Construction General Permit
City of Santa Monica Fire Department	Approval of the site plan for emergency access
City of Santa Monica Public Works/ Engineering	Issuance of the Grading Permit

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3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

1. Project Title: Will Rogers Learning Community Campus Expansion and Improvement Project

2. Lead Agency Name and Address: Santa Monica-Malibu Unified School District
   2828 4th Street
   Santa Monica, CA 90405

3. Contact Person and Phone Number: Carey Upton, Chief Operations Officer
   (310) 450-8338 x79383

4. Project Location: 2401 14th Street
   Santa Monica, CA 90405

5. Project Sponsor's Name and Address: Same as Lead Agency

6. General Plan Designation: Institutional/Public Lands; Low Density Housing

7. Zoning: Institutional/Public Lands (PL); Low Density Residential (R2)

8. Description of Project:
   The Santa Monica-Malibu Unified School District (District) is proposing to expand the campus and make improvements to the Will Rogers Learning Community based on the 2020 Campus Master Plan (Proposed Project). The purpose of the Proposed Project is to expand the campus and implement campus modernization efforts needed to align with the District's educational specifications. Overall, the Proposed Project would occur over four phases and would result in removal/demolition of 16 permanent and temporary buildings, construction of three new buildings, renovation and reuse of eight existing buildings and outdoor spaces, and reconfiguration of outdoor and parking/transportation areas over an approximate span of 10 to 15 years. Phase 1, which is currently funded, includes removal of six existing portable classrooms and 1 restroom building, construction of a new one-story early education classroom building and associated play yards, and construction of a new play field. Subsequent phases would be constructed as funding becomes available and would include removal of five additional existing modular classrooms, removal of four one-story classroom buildings, expansion and reconfiguration of an existing parking lot, construction of a new student drop-off/pick-up area, repurposing existing classrooms into STEM classrooms, repurposing outdoor spaces into outdoor classrooms, construction of a new multipurpose room/food services facility, installation of a learning garden, construction of a new parking lot, and construction of a new two-story classroom building. Refer to Chapter 2, "Project Description" for additional information.

9. Surrounding Land Uses and Setting:
   The area surrounding the campus is primarily developed with public/institutional and residential land uses (see Figure 2-3). John Adams Middle School is located to the northeast of the campus, across from 16th Street. Santa Monica College is located further northeast of the campus, along the intersection of 16th Street and Pearl Street. Low-density residential housing is located immediately adjacent to the campus to the northwest and southeast. Neighborhood commercial uses, including retail stores, restaurants, markets, and offices, are located further southeast of the project stie, along Ocean Park Boulevard. Across from 14th Street to the southwest of the campus are single family residences.

10. Other public agencies whose approval is required:
    - District Board of Education: Approval of the Proposed Project and adoption of the Mitigated Negative Declaration
    - Division of the State Architect: Approval of the construction drawings

- State Water Resources Control Board: Issuance of the National Pollution Discharge Elimination System Construction General Permit
- City of Santa Monica Fire Department: Approval of the site plan for emergency access
- City of Santa Monica Public Works/Engineering: Issuance of the Grading Permit

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?
Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

    In accordance with Assembly Bill (AB) 52 and Public Resources Code Section 21080.3.1, the District sent formal notification letters for the Proposed Project, dated June 21, 2022, to two Native American tribes that have requested notification from the District. These tribes include the Gabrieleño Band of Mission Indians – Kizh Nation and the Torres Martinez Desert Cahuilla Indians. Neither tribe responded. Refer to Section 3.18, "Tribal Cultural Resources," of this Draft Initial Study/Proposed Mitigated Negative Declaration (IS/Proposed MND) for additional information.

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. Where checked below the topic with a potentially significant impact will be addressed in an environmental impact report.

- ☐ Aesthetics
- ☐ Agriculture and Forest Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology / Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards / Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities / Service Systems
- ☐ Wildfire
- ☐ Mandatory Findings of Significance
- ☐ None
- ☒ None with Mitigation Incorporated

DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Signature _____ Date 11/9/22

Printed Name: Carey Upton Title: Chief Operations Officer

Agency: Santa Monica-Malibu Unified School District

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 AESTHETICS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics.				
Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), 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 non-urbanized 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 points.) 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?	☐	☐	☒	☐

3.1.1 Environmental Setting

The Proposed Project's site is in a fully developed urbanized area. The Will Rogers campus is comprised of 14 permanent one-story buildings as well as 11 temporary portable buildings, parking lots, play fields, and playgrounds. Views from the campus include one- and two-story buildings and landscaping associated with the adjacent residential and institutional development.

Scenic resources within the City of Santa Monica include the Santa Monica Pier and the panoramic views of the Santa Monica Bay and coastline (City of Santa Monica 1975).

The nearest officially designated state scenic highway is a segment of State Route 27, located approximately 6.8 miles northwest of the campus. Eligible state scenic highways in proximity to the campus include: (1) an approximately 47-mile segment of State Route 1 from Interstate 10 in the City of Santa Monica to U.S. Route 101 in the City of Oxnard, with the nearest segment located approximately 0.8 mile northwest of the campus; and (2) an approximately 1.1-mile segment of State Route 1 from Ozone Avenue in the City of Santa Monica to Lucille Avenue in the City of Los Angeles, with the nearest segment located approximately 0.6 mile southwest of the campus (Caltrans 2018).

The campus and vicinity include levels of lighting that are characteristic of an urban environment. Existing light sources within the project site include interior and exterior building lighting and wayfinding lighting along campus pathways. Light sources surrounding the campus include interior and exterior lighting from residential and commercial buildings, sport field lighting from the adjacent John Adams Middle School across 16th Street, and street and vehicle lighting on surrounding roadways.

3.1.2 Discussion

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

No Impact. Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. As described in Section 3.1.1, scenic views within the City of Santa Monica are concentrated around the coastline and include views of the Santa Monica Bay and Santa Monica Pier. The campus is approximately 1.3 miles inland from the Santa Monica coastline and Pacific Ocean and is within an urbanized area characterized by residential and institutional uses. Due to the flat topography of the campus and intervening urban development, the campus is not visible from a scenic vista nor does it offer views toward scenic vistas. Views from the project site are limited to surrounding urban development, including the surrounding roadways as well as one- and two-story buildings and landscaping associated with the adjacent residential and institutional development.

Furthermore, the improvements proposed as part of Phase 1 would be primarily limited to the removal of existing portables and construction of a new, one-story classroom building and playfield, which would not block or diminish views to and from the campus. Phase 2 would similarly involve the removal of existing portables and would also include expansion and reconfiguration of an existing parking lot, construction of a new student drop-off/pick-up area, and repurposing of existing indoor classrooms and outdoor spaces into STEM and outdoor classrooms, respectively. Under Phase 3, a new multipurpose culinary café and lunch shelter would be constructed, portions of Building A would be repurposed for faculty or auditorium support uses, and the existing learning garden would be renovated. Improvements proposed under these phases would not include any elements that would obstruct views to and from the campus. Lastly, Phase 4 includes the removal of part of the existing playground in the northwest corner of the campus; removal of existing Buildings K, M, N, and P; removal of existing modular buildings Q, R, S, T and U; construction of a new two-story elementary classroom building; and expansion of the playground constructed under Phase 2. While the new two-story classroom building would replace an existing playground, the building would be of similar massing and height as other existing two-story buildings in the surrounding neighborhood. Specifically, there are existing two-story multi-family residential structures immediately adjacent to the north-northwest of the campus, near the location of the new two-story classroom building. Consequently, the Proposed Project would not result in a noticeable change to existing viewsheds, and as noted previously, the campus is not visible from a scenic vista, nor does it offer views toward scenic vistas. Therefore, there would be no impact on scenic vistas and no mitigation is required.

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

No Impact. There are no rock outcroppings onsite or in the Proposed Project's vicinity. Additionally, existing trees on the campus are ornamental and part of the school's overall landscaping. As discussed in Section 3.1.1, the campus is 0.8 mile from State Route 1, the nearest eligible state scenic highway, and 6.8 miles from State Route 27, the nearest officially designated state scenic highway. All Proposed Project's improvements would occur within the Will Rogers campus and would not encroach onto a state scenic highway or damage scenic resources. Although the Will Rogers campus contains a historic district, the campus is not within the viewsheds of these highways due to the distance, the relatively flat topography, and the intervening urban development. Therefore, no impact on scenic resources, including trees, rock outcroppings, historic buildings, or any other scenic resources within a state scenic highway would occur.

c) In non-urbanized 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 points.) 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. The campus consists of a built-out school campus in a fully developed urbanized area. The campus is zoned for Institutional/Public Lands (PL) and has a land use designation of Institutional/Public Lands in the City's General Plan. Schools are allowable within the Institutional/Public Lands designation, as established in Section

9.15.010 of the City's Municipal Code. The Proposed Project would not change the campus' existing land use designation and therefore would continue to be consistent with the City's land use designation for the site.

Construction activities would occur within the Will Rogers campus. Of the four phases, Phase 2 would have the shortest construction period of approximately 12 months and Phase 1 would have the longest construction period of approximately 19 months. During the construction period, various types of construction equipment (e.g., backhoes, forklifts, skip loaders, and compaction rollers) would be present on-site. Before construction activities begin for any phase, temporary fencing would be installed around the construction areas. Construction activities occurring at ground level would be largely obscured from off-site viewpoints by intervening fencing, buildings, and vegetation on the campus. Furthermore, visual effects from construction activities would be temporary and short-term. As such, construction of the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality.

All new buildings constructed in Phases 1 and 3 would be one-story, and therefore would not exceed the height limit for the PL zone of 32 feet as established in Section 9.15.030 of the City's Municipal Code. No new structures would be constructed during Phase 2. However, Phase 4 would include a new two-story elementary classroom building. At this time, no specific design is available for the new two-story classroom building, as Phase 4 is currently unfunded. While it is anticipated that the new two-story building would not exceed the height limit in the City's Municipal Code, rooftop equipment and associated screening materials required by Section 9.21.140 of the City's Municipal Code could potentially extend above the roof height limit. However, this exceedance is acceptable pursuant to Section 9.21.160 of the City's Municipal Code if the equipment and screening materials do not extend greater than 12 feet above the 32-foot roof line height limit. Furthermore, the height of the proposed facilities would be consistent with the height of other two-story structures within the surrounding neighborhood, including those present immediately adjacent to the campus on the north-northwest.

Based on the Historic Resources Inventory Report prepared for the campus, a portion of the Will Rogers campus was identified as a historic district that is eligible for listing in the California Register of Historical Resources and for designation as a City of Santa Monica historic district (Historic Resources Group 2022) (see Figure 2-4). The historic district consists of 13 contributing buildings, three site features, and one additional feature with a period of significance from 1948 to 1950, which are described in more detail in Section 3.5, "Cultural Resources." As discussed further in Section 3.5, the Proposed Project would involve demolition of contributing Buildings M, N, P, and K, but would also include improvements to several of the contributing features. The District adopted Board Policy (BP) 7113 on February 9, 2021, which outlines objectives and establishes procedures for the treatment of historical resources on District campuses. In compliance with BP 7113, the rehabilitation and adaptive reuse of identified historical resources on the Will Rogers campus would be consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation*. As discussed further in Section 3.5, "Cultural Resources," the Proposed Project would retain the majority of the character-defining features on contributing buildings and would preserve the features that convey the historical and architectural values. Therefore, the proposed improvements would not conflict with applicable zoning and other regulations governing scenic quality.

Based on the above discussion, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant, and no mitigation is required.

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. The Proposed Project site consists of a built-out school campus in a fully developed urbanized area. As described in Section 3.1.1, existing light sources within the campus include interior and exterior building lighting and wayfinding lighting along campus pathways. Light sources surrounding the campus include interior and exterior lighting from residential and commercial buildings, sport field lighting from the adjacent John Adams Middle School across 16th Street, and street and vehicle lighting on surrounding roadways. As such, the campus is in a generally lit area, characteristic of a typical urban environment.

Light-sensitive receptors are generally considered to be residential properties, and may also include hospital, or nursing home uses, where excessive nighttime lighting may affect the use of the property. The nearest residences are

single-family homes on 14th Street and Maple Street that the school property on the southeast, as well as multi-family residences on 14th Street that abut the school property on the northwest. Additionally, single-family homes are present across the street from the campus along 14th Street. With a permit from the City of Santa Monica, construction activities would occur between the hours of 7:00 a.m. and 6:00 p.m. on Monday through Friday and between the hours of 9:00 a.m. and 5:00 p.m. on Saturday. No nighttime lighting would be required during construction. Therefore, construction activities would not create new sources of light that would adversely affect nighttime views or disrupt sleep at the residences.

The Proposed Project would primarily involve the renovation and repurposing of existing buildings and courtyards on the campus that currently contain interior and exterior lighting elements. However, Phases 1, 3, and 4 would include the construction of new permanent buildings where none currently exist. In addition, Phase 2 would include a new parking lot along the northwestern portion of the campus that would connect 14th Street and 16th Street. While these improvements would introduce new sources of interior and/or exterior lighting on the campus, the lighting associated with the proposed buildings and parking lot would be similar in intensity to existing conditions and adjacent properties. Consistent with existing conditions and the District's lighting standards, the Proposed Project would include only the minimum amount of outdoor lighting necessary to maintain safety and comfort. Nighttime lighting would be limited to wayfinding and security lighting, which would be shielded and directed onsite to minimize spillover effects and night sky pollution. Consequently, new lighting from the Proposed Project would not result in a noticeable change to nighttime views in the area.

Daytime glare is typically caused by reflective building materials, such as glass, stainless steel, aluminum, and photovoltaic panels. During construction, glare would be introduced to the campus from windshields of vehicles and construction equipment. These sources of glare would be minor, limited to the ground level, and would not adversely affect daytime views of the area. The Proposed Project would not involve the use of reflective building materials that would create new sources of glare during operation. Vertically retracting glass doors would primarily be situated towards the interior of the Will Rogers campus and would be limited to the lower story of the buildings. As such, any glare reflecting from the glass doors would be screened such that surrounding roadways and residences would not be adversely affected. Solar panels could potentially be installed on the rooftops of new buildings in future phases. These roof-mounted panels would not be visible from surrounding uses and therefore would not result in glare for nearby receptors. For these reasons, the Proposed Project is not anticipated to introduce a new substantial source of glare to the project area such that daytime views are adversely affected.

Based on the above discussion, the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts related to scenic quality would be less than significant and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts on aesthetics and no mitigation measures are required.

3.2 AGRICULTURE AND FORESTRY RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forestry Resources.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land 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 non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.2.1 Environmental Setting

According to the California Department of Conservation (CDOC) Farmland Mapping and Monitoring Program, there are no lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland) within the City of Santa Monica. The City of Santa Monica, including the campus, is entirely within an area classified as "Urban and Built-Up Land" (CDOC 2020).

The campus is developed with an elementary school in an urbanized area. The campus is currently zoned Institutional/Public Lands (PL) and has a land use designation of Institutional/Public Lands. There are no lands within the City of Santa Monica that are enrolled in a Williamson Act contract (CDOC 2017). Further, there are no agricultural or forest land uses within or in proximity to the campus.

3.2.2 Discussion

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

No Impact. As discussed in Section 3.2.1, the campus is in an urbanized area where there are no farmlands or agricultural resources. The campus is developed with an elementary school and is classified as "Urban and Built-Up Land" by the California Department of Conservation. There is no land classified as Important Farmland within the campus or the City of Santa Monica (CDOC 2020). Therefore, the Proposed Project would have no impact related to the conversion of Important Farmland to non-agricultural use and no mitigation is required.

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

No Impact. As discussed in Section 3.2.1, the campus is developed with an elementary school in an urbanized area where there are no farmlands or agricultural resources. In addition, the campus is zoned Institutional/Public Lands (PL) and has a land use designation of Institutional/Public Lands. There are no lands within the City of Santa Monica that are enrolled in a Williamson Act contract, which applies to parcels within an established agricultural preserve consisting of at least 20 acres of Prime Farmland or at least 40 acres of land not designated as Prime Farmland (CDOC 2017). Therefore, the Proposed Project would have no impact related to conflicts with existing zoning for agricultural use or a Williamson Act contract and no mitigation is required.

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

No impact. As discussed in Section 3.2.1, the campus is developed with an elementary school in an urbanized area. There is no forest land or timberland within the campus or in the project vicinity. The campus is zoned Institutional/Public Lands (PL) and has a land use designation of Institutional/Public Lands (PL). The campus is classified as "Urban and Built-Up Land" and is not zoned as forest land, timberlands, or timberland zoned Timberland Production (CDOC 2020). Therefore, the Proposed Project would have no impact related to conflicts with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production and no mitigation is required.

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

No impact. As discussed in Section 3.2.1, the campus is developed with an elementary school and does not contain forest land. Therefore, the Proposed Project would have no impact related to the loss or conversion of forest land to non-forest use and no mitigation is required.

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. As discussed in Section 3.2.1, the campus consists of an elementary school within a developed, urban area. There is no farmland or forest land within or in proximity to the campus. Therefore, the Proposed Project would have no impact related to changes in the existing environment that could result in the conversion of Important Farmland or forest land and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts on agriculture and forestry resources and no mitigation measures are required.

3.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?	☒ Yes		☐ No	
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 non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 Environmental Setting

CLIMATE, METEOROLOGY, AND TOPOGRAPHY

The campus is located within the South Coast Air Basin (Basin), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Basin, which is a coastal plain with connecting broad valleys and low hills. The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (i.e., weather and topography) as well as human-made influences (i.e., development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

The greatest air pollution impacts in the Basin occur from June through September and are generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. These conditions frequently reduce pollutant dispersion, thereby causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day ozone (O_3) concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert.

The local meteorology of the campus and surrounding area is represented by measurements recorded at the Santa Monica Monitoring Station (ID 047950). The average low is reported at 43.7°F in January, and the average high is

70.5°F in August (WRCC 2012). In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. The historical rainfall average for the project area is 14.59 inches per year (WRCC 2012).

AMBIENT AIR QUALITY

As required by the federal Clean Air Act (CAA), the U.S. Environmental Protection Agency (EPA) has identified National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, which are particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively), and lead. The State of California has also established California Ambient Air Quality Standards (CAAQS) for these six pollutants as well as sulfates, hydrogen sulfide (H_2S), vinyl chloride, and visibility reducing particles. NAAQS and CAAQS are summarized in Table 3.3-1. A brief description of each criteria air pollutant's source types, and health effects is provided below in Table 3.3-2.

Table 3.3-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California (CAAQS)[a,b]	National (NAAQS)[c] Primary[b,d]	National (NAAQS)[c] Secondary[b,e]
Ozone	1-hour	0.09 ppm (180 µg/m^3)	–[e]	Same as primary standard
	8-hour	0.070 ppm (137 µg/m^3)	0.070 ppm (147 µg/m^3)	Same as primary standard
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	Same as primary standard
	8-hour	9 ppm[f] (10 mg/m^3)	9 ppm (10 mg/m^3)	Same as primary standard
Nitrogen dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57 µg/m^3)	53 ppb (100 µg/m^3)	Same as primary standard
	1-hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	—
Sulfur dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	—	—
	3-hour	—	—	0.5 ppm (1300 µg/m^3)
	1-hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	—
Respirable particulate matter (PM_{10})	Annual arithmetic mean	20 µg/m^3	—	Same as primary standard
	24-hour	50 µg/m^3	150 µg/m^3	Same as primary standard
Fine particulate matter ($PM_{2.5}$)	Annual arithmetic mean	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
	24-hour	—	35 µg/m^3	Same as primary standard
Lead [f]	Calendar quarter	—	1.5 µg/m^3	Same as primary standard
	30-Day average	1.5 µg/m^3	—	—
	Rolling 3-Month Average	–	0.15 µg/m^3	Same as primary standard
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m^3)	No National standards	No National standards
Sulfates	24-hour	25 µg/m^3	No National standards	No National standards
Vinyl chloride [f]	24-hour	0.01 ppm (26 µg/m^3)	No National standards	No National standards
Visibility-reducing particulate matter	8-hour	Extinction of 0.23 per km	No National standards	No National standards

Notes: µg/m^3 = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million.

a California standards for ozone, carbon monoxide, SO_2 (1- and 24-hour), NO_2, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

c National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. The PM_{10} 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. The $PM_{2.5}$ 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.

d National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

e National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

f The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: CARB 2016a.

Table 3.3-2 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute[1] Health Effects	Chronic[2] Health Effects
Ozone	Secondary pollutant resulting from reaction of VOC and NO_X in presence of sunlight. VOC emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels	Increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	Permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide (CO)	Incomplete combustion of fuels; motor vehicle exhaust	Headache, dizziness, fatigue, nausea, vomiting, death	Permanent heart and brain damage
Nitrogen dioxide (NO_2)	Combustion devices; e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines	coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, death	Chronic bronchitis, decreased lung function
Sulfur dioxide (SO_2)	Coal and oil combustion, steel mills, refineries, and pulp and paper mills	Irritation of upper respiratory tract, increased asthma symptoms	Insufficient evidence linking SO_2 exposure to chronic health impacts
Respirable particulate matter (PM_{10}), Fine particulate matter ($PM_{2.5}$)	Fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO_2 and VOC	Breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	Alterations to the immune system, carcinogenesis
Lead	Metal processing	Reproductive/ developmental effects (fetuses and children)	Numerous effects including neurological, endocrine, and cardiovascular effects

Notes: NO_X = oxides of nitrogen; VOC= volatile organic compounds.

[1] "Acute" refers to effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.

[2] "Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.

Sources: EPA 2016.

ATTAINMENT DESIGNATION

As shown in Table 3.3-3, the Basin is designated as a nonattainment for ozone with respect to both the NAAQS (8-hour standard) and CAAQS (1-hour Classification and 8-hour standard), nonattainment for PM_{10} with respect to the CAAQS, and nonattainment for $PM_{2.5}$ with respect to the NAAQS and CAAQS.

Table 3.3-3 Attainment Status Designations for Los Angeles County Portion of Basin

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone	Nonattainment (1-hour) - - Extreme	Nonattainment (1-hour)
	Nonattainment (8-hour) - Extreme	Nonattainment (8-hour)
Respirable particulate matter (PM_{10})	Attainment (Maintenance) (24-hour)	Nonattainment (24-hour)
	Attainment (Maintenance) (24-hour)	Nonattainment (Annual)
Fine particulate matter ($PM_{2.5}$)	Nonattainment (24-hour) - Serious	(No State Standard for 24-Hour)
	Nonattainment (Annual) - Serious	Nonattainment (Annual)
Carbon monoxide (CO)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen dioxide (NO_2)	Unclassified/Attainment (1-hour)	Attainment (1-hour)
	Attainment (Maintenance) (Annual)	Attainment (Annual)
Sulfur dioxide (SO_2)	(Attainment Pending) (1-Hour)	Attainment (1-hour)
	(Attainment Pending) (1-Hour)	Attainment (24-hour)
Lead (Particulate)	Nonattainment (3-month rolling average) (partial)[1]	Attainment (30 day average)
Hydrogen Sulfide	No Federal Standard	Attainment (1-hour)
Sulfates	No Federal Standard	Attainment (24-hour)
Visibly Reducing Particles	No Federal Standard	Unclassified (8-hour)
Vinyl Chloride	No Federal Standard	Attainment (24-hour)

[1] Note that the Los Angeles County portion of the Basin is nonattainment for the NAAQS lead standard. The remainder of the Basin is in attainment.

Source: SCAQMD 2016, CARB 2020.

TOXIC AIR CONTAMINANTS

According to the *California Almanac of Emissions and Air Quality* (CARB 2013), the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being diesel PM. Diesel PM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike the other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, the California Air Resources Board (CARB) has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM_{10} database, ambient PM_{10} monitoring data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

According to CARB, diesel engine emissions are believed to be responsible for about 70 percent of California's estimated known cancer risk attributable to TACs. Also, diesel PM comprises about 8 percent of outdoor $PM_{2.5}$, which is a known health hazard. As a significant fraction of $PM_{2.5}$, diesel PM contributes to numerous health impacts that have been attributed to particulate matter exposure, including increased hospital admissions, particularly for heart disease, but also for respiratory illnesses, and even premature death. CARB estimates that diesel PM contributes to approximately 1,400 (95 percent confidence interval: 1,100-1,800) premature deaths from cardiovascular disease annually in California. Additionally, exposure to diesel exhaust may contribute to the onset of new allergies; a clinical study of human subjects has shown that diesel exhaust particles, in combination with potential allergens, may actually be able to produce new allergies that did not exist previously (CARB 2022).

ODORS

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant). It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. Odor sources of concern include wastewater treatment plants, sanitary landfills, composting facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting operations, rendering plants, and food packaging plants (SCAQMD 2005). None of these odorous land uses are within proximity to the campus.

SENSITIVE RECEPTORS

The South Coast Air Quality Management District (SCAQMD) defines sensitive receptor locations as residential, commercial, and industrial land use areas, as well as other locations where sensitive populations may be located, such as schools, hospitals, convalescent homes, day care centers, and other locations where children, chronically ill individuals, or other sensitive persons could be exposed (SCAQMD 2005).

The area surrounding the campus is primarily developed with public/institutional and residential land use. John Adams Middle School is located to the northeast of the campus, across from 16th Street. Santa Monica College is located further northeast of the campus, along the intersection of 16th Street and Pearl Street. Low-density residential housing is located immediately adjacent to the campus to the northwest and southeast. Neighborhood commercial uses, including retail stores, restaurants, markets, and offices, are located further southeast of the project stie, along Ocean Park Boulevard. Across from 14th Street to the southwest of the campus are single family residences.

SCAQMD AIR QUALITY MANAGEMENT PLANS

The campus lies within the Los Angeles County portion of the Basin, which is under the jurisdiction of SCAQMD. SCAQMD has jurisdiction over an area of approximately 10,743 square miles, including all of Orange County, Los Angeles County (except for the Antelope Valley), the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The Basin is a sub-region of SCAQMD's jurisdiction. Although air quality in this area has improved, the Basin requires continued diligence to meet air quality standards.

SCAQMD has adopted a series of air quality management plans (AQMPs) to meet the CAAQS and NAAQS. These plans require, among other emissions-reducing activities, control technology for existing sources, control programs for area sources and indirect sources, an SCAQMD permitting system that allows no net increase in emissions from any new or modified (i.e., previously permitted) emissions sources, and transportation control measures. The most recent adopted AQMD is the 2016 AQMP, which is intended to serve as a regional blueprint for achieving the federal air quality standards for healthful air. The Draft 2022 AQMP was released for public comment in May 2022. As of August 2022, the 2022 AQMD remains in Draft form. The 2016 AQMP addressed the 1997 8-hour (80 parts per billion [ppb]) and 2008 8-hour ozone standards (75 ppb), as well as $PM_{2.5}$ standards. The 2022 AQMD is focused on attaining the 2015 8-hour ozone standard of 70 ppb.

The 2016 AQMP is a thorough analysis of existing and potential regulatory control options and includes available, proven, and cost-effective strategies to pursue multiple goals in promoting reductions in GHG emissions and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public

health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the NAAQS are not met by the established date (SCAQMD 2016).

The Draft 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard (SCAQMD 2022a).

3.3.2 Discussion

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

Less-than-significant Impact. According to SCAQMD, an air quality impact would be significant if implementation of the Proposed Project would conflict with or obstruct implementation of SCAQMD's AQMP. Implementation of the Proposed Project would involve renovation and demolition of existing buildings, as well as construction of new buildings on the Will Rogers Learning Community campus. However, these improvements would not change the nature of the existing land uses on the campus and would not result in an increase in school capacity or operational changes aside from operation of the new buildings. Thus, the land uses proposed under the Proposed Project are consistent with the current land uses and designations for the campus.

Pursuant to SCAQMD guidelines, because the Proposed Project would be consistent with the land use designation in the General Plan, the Proposed Project is considered consistent with the region's AQMP. As such, Proposed Project-related emissions are accounted for in the AQMP, which has been developed to bring the Basin into attainment status for all nonattainment pollutants and precursors thereof. Accordingly, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant and no mitigation would be required.

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

Less-than-significant Impact. According to SCAQMD, an air quality impact would be significant if implementation of the Proposed Project would generate construction and operational emissions in exceedance of SCAQMD's mass emission thresholds shown in Table 3.3-4 below.

Table 3.3-4 SCAQMD Significance Thresholds (pounds per day)

	VOC[a]	NOx	CO	PM_{10}	$PM_{2.5}$	SO_2	Pb[b]
Regional Mass Emissions							
Construction	75	100	550	150	55	150	3
Operations	55	55	550	150	55	150	3
Localized Significance Thresholds							
Construction[c]	--	103	562	4	3	--	--
Operations[c]	--	103	562	1	1	--	--

Notes: VOC = volatile organic compounds; NOx = oxides of nitrogen; CO = carbon dioxide; PM_{10} = particulate matter with aerodynamic diameter 10 micrometers; PM_{10} = particulate matter with aerodynamic diameter 10 micrometers; SO_2 = sulfur dioxide; Pb = lead.

[a] ROGs and VOCs are used interchangeably to refer to the hydrocarbons that are a precursor to O_3 formation. However, because SCAQMD uses VOCs in the formulation of its thresholds, VOCs are presented herein.

[b] The Proposed Project would result in no lead emissions during construction or operations. As such, lead emissions are not evaluated.

[c] Localized thresholds are based on a 1-acre project site and 25-meter distance to receptors within SRA 2 (Northwest Los Angeles County Coastal). SCAQMD has not developed LSTs for VOC, SO_2, or Pb emissions.

Source: SCAQMD 2008, 2019.

With respect to localized emissions, SCAQMD has developed localized significance thresholds (LSTs) and mass rate look-up tables to help public agencies analyze the Proposed Project-related effects of pollutants on nearby receptors. The LSTs are based on the size or total area of the emissions source, the ambient air quality in each source receptor area (SRA) where the emissions sources are located, and the distance to nearby sensitive receptor locations.

The Proposed Project encompasses the 6.7-acre school site in the City of Santa Monica. Construction is estimated to involve 5.34 acres of ground disturbance in total, but activities at each phase encompass an average of approximately one acre at a time (see Table 2-2 in Section 2, "Project Description"). Therefore, because LSTs are based on the potential area disturbed on any given day and in any portion of the site (i.e., at the edge of the project site near adjacent receptors), and each phase encompasses approximately one acre, the LST analysis assumes one acre is disturbed per day and the worst-case scenario of 25-meter (82 feet) receptor distance to receptors consistent with SCAQMD methodology. These thresholds are the strictest thresholds in the SCAQMD's LST lookup table and hence would be the most conservative thresholds for the analysis. Similarly, the same one-acre assumption is applied to operations because new operational emissions would be limited to new buildings only, which encompass much less than one acre.

The Proposed Project would contribute to regional air pollutant emissions during short-term construction and long-term operations. However, these emissions would not exceed the threshold of any criteria pollutant for which the Basin is non-attainment under CAAQS and NAAQS. An analysis of the construction- and operation-related effects of the Proposed Project is presented below. Note that the emissions presented in Tables 3.3-5 and 3.3-6 were estimated using preliminary site plans based on the Will Rogers Learning Community Campus Master Plan (September 1, 2020). Since then, refinements have been made to certain Proposed Project components, including some changes in square footages. These changes do not alter the conclusions presented in the analysis below.

Construction

Construction of the Proposed Project has the potential to create air quality impacts through the use of vehicles and equipment such as heavy-duty construction equipment, construction workers' vehicle trips, material deliveries, and trips by heavy-duty haul trucks. In addition, earthwork activities would result in fugitive dust emissions, and paving operations would release VOCs from off-gassing. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources. Fugitive PM_{10} and $PM_{2.5}$ emissions estimates reflect compliance with SCAQMD Rule 403, which is mandatory. Compliance with SCAQMD's Rule 403 requires watering three times a day during construction to suppress fugitive dust. Additionally, this assessment considers that the District would require all construction contractors to utilize equipment with Tier 4 engines.

Construction-related regional mass emission estimates are shown in Table 3.3-5. Although the exact timing for implementation of each phase is currently unknown, to provide a realistic worst-case scenario, the analysis herein assumes that construction activities in Phase 1 would occur in 2023 and 2024, Phase 2 in 2025, Phase 3 in 2026 and 2027, and Phase 4 in 2029 and 2030. This analysis also assumes that none of the phases would overlap in construction.

As shown in Table 3.3-5, maximum daily Proposed Project-related criteria pollutant emissions would not exceed SCAQMD regional and localized construction-period thresholds.

Table 3.3-5 Estimated Regional and Localized Construction Emissions – Unmitigated Pounds Per Day

Construction Phase	ROG	NOx	CO	PM_{10}	$PM_{2.5}$	SO_2
Regional Emissions						
Phase 1 – Early Learning Classroom and Play Field	5	11	13	3	1	<0.1
Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area	2	17	15	4	1	<0.1
Phase 3 – Multipurpose Culinary Café, Learning Garden, and Parking	3	8	13	1	<1	<0.1
Phase 4 – Elementary Classroom Building	8	8	13	1	<1	<0.1
Maximum Daily Activities	8	17	15	4	1	<0.1
Mass Emissions Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Phase 1 – Early Learning Classroom and Play Field	N/A	8	10	2	<1	N/A
Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area	N/A	2	9	1	<0.1	N/A
Phase 3 – Multipurpose Culinary Café, Learning Garden, and Parking	N/A	7	11	<1	<1	N/A
Phase 4 – Elementary Classroom Building	N/A	7	11	<1	<1	N/A
Maximum Daily Activities	N/A	8	11	2	<1	N/A
Localized Significance Threshold	**N/A**	**103**	**562**	**4**	**3**	**N/A**
Exceed Threshold?	**N/A**	**No**	**No**	**No**	**No**	**N/A**

Notes: Emissions may not add up exactly because of rounding.

Source: Modeled by Ascent Environmental in 2022.

Operations

Once operational, the Proposed Project would result in air pollutant emission sources that are similar to, but expand upon, existing sources, but in different quantities. It was assumed that the only new operational elements would include new buildings, playgrounds, parking lots, and cafeteria. This increase in building area may increase area and energy consumption, which are based on building size. Because the Proposed Project would not increase student or staff capacity, the Proposed Project is not assumed to increase motor vehicle trips over existing conditions. Thus, the operational analysis is based on the potential increase in building area and energy sources only, and mobile sources are not included.

As shown in Table 3.3-6, the increase in maximum daily Proposed Project-related criteria pollutant emissions over existing conditions would be minor and would not exceed SCAQMD operations-period regional and localized significance thresholds for any pollutant.

Table 3.3-6 Estimated Regional and Localized Operational Emissions – Unmitigated Pounds Per Day

	ROG	NOx	CO	PM_{10}	$PM_{2.5}$	SO_2
Phase 1 – Early Learning Classroom and Play Field	<1	<0.1	<0.1	<0.1	<0.1	<0.1
Phase 2 – STEM Maker Space Classrooms, Outdoor Classrooms, Parking, and Drop-Off/Pick-Up Area	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Phase 3 – Multipurpose Culinary Café, Learning Garden, and Parking	<0.1	1	1	<0.1	<0.1	<0.1
Phase 4 – Elementary Classroom Building	1	<0.1	<0.1	<0.1	<0.1	<0.1
Total	1	1	1	<0.1	<0.1	<0.1
Mass Emissions Threshold	55	55	550	150	55	150
Localized Significance Threshold	N/A	103	562	1	1	N/A
Exceed Threshold?	No	No	No	No	No	No

Notes: Emissions may not add up exactly because of rounding

Source: Modeled by Ascent Environmental in 2022.

Summary

As shown in Tables 3.3-5 and 3.3-6, the Proposed Project would not generate maximum daily Proposed Project-related criteria pollutant emissions in exceedance of SCAQMD regional and localized thresholds during construction and operation. Therefore, impacts would be less than significant and no mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less-than-significant Impact. According to SCAQMD, an air quality impact would be significant if implementation of the Proposed Project would:

- generate construction and operational emissions in exceedance of the SCAQMD's localized significance thresholds shown in Table 3.3-4;
- generate long-term operational mobile-source CO emissions that would result in, or contribute to, an exceedance of the CAAQS (exceedance of 20 ppm over a 1-hour period or exceedance of 9 ppm over an 8-hour period) or NAAQS (exceedance of 35 ppm over a 1-hour period or exceedance of 9 ppm over an 8-hour period) for CO; or
- expose sensitive receptors to TAC concentrations that result in an incremental increase in cancer risk greater than 10 in one million and/or a noncarcinogenic hazard index of 1.0 or greater.

The Proposed Project would contribute to localized air pollutant emissions during construction (short term) and operations (long term). The analysis of receptor pollutant exposure includes a discussion of short-term exposure to criteria pollutants (i.e., LSTs) and TACs (i.e., exposure to diesel exhaust), while the long-term analysis includes a discussion of criteria pollutants, TACs, as well as concentrations of CO (i.e., CO hot spots) due to increased congestion and degraded roadway conditions as a result of the Proposed Project's implementation.

Localized Emissions

The Proposed Project's construction would emit localized pollutants through the on-site use of heavy-duty construction equipment as well as fugitive dust from ground-disturbing activities. These localized emissions could expose nearby sensitive receptors to substantial pollutant concentrations. SCAQMD has developed a set of localized mass emissions rate look-up tables that can be used to evaluate localized impacts that may result from construction-period and operational emissions. According to SCAQMD, only those emissions that occur on-site are to be considered in the LST analysis. Consistent with SCAQMD LST methodology, emissions related to haul truck and employee commuting activity during construction are not considered in the evaluation of localized impacts.

As shown in Tables 3.3-5 and 3.3-6, localized emissions during construction and operations, respectively, would not exceed the applicable LSTs for the campus area. Consistent with SCAQMD guidance, because LSTs would not be exceeded, no further analysis is warranted.

Toxic Air Contaminants

With respect to TACs, the closest sensitive land uses are the residential areas to the northwest and southeast of the campus. The Proposed Project would be constructed in four phases, with construction activities anticipated to begin in June 2023 and end in December 2030. Construction activities would be sporadic in both duration and location, with actual construction anticipated to take place over four-plus years (beginning in June 2023 and ending in December 2030), which is much shorter than the assumed 70-year exposure period used to estimate lifetime cancer risks. Furthermore, SCAQMD does not consider diesel-related cancer risks from construction equipment to be an issue because of the short-term nature of construction activities (SCAQMD 2022b). Construction activities associated with the Proposed Project would be sporadic (i.e., occurring in phases), transitory (i.e., occurring over the entire campus), and short term in nature at any given location on-site. As such, construction of the Proposed Project alone is not anticipated to result in an elevated health risk to exposed persons because of the short-term nature of construction-related diesel exposure.

Long-term, the only operational change would be the increase in building square footage associated with the new buildings, playgrounds, parking lots and cafeteria, which may increase the area and energy source emissions relative to existing conditions. The Proposed Project would not increase student or staff capacity and would thus not increase vehicle travel. Thus, the emissions from operational TAC sources and the associated health risk to the surrounding community is expected to be minimal. Therefore, operation of the Proposed Project is not anticipated to result in elevated health risk exposure for sensitive receptors (e.g., nearby residences).

Carbon Monoxide

Elevated levels of CO concentrations are typically found in areas with significant traffic congestion. CO is a public health concern because at high enough concentrations, it can cause health problems such as fatigue, headache, confusion, dizziness, and even death. Ambient concentrations of CO have declined dramatically in California because of existing controls and programs. Most areas of the state, including the region in which the Proposed Project is located, meet the state and federal CO standards (CARB 2004). SCAQMD's 2003 AQMP (SCAQMD 2003), which is the most recent AQMP that addresses CO concentrations, includes a revision to the Federal Attainment Plan for Carbon Monoxide that was originally approved in 1992. The 2003 AQMP included a CO hot spots analysis at four specified heavily traveled intersections in Los Angeles at the peak morning and afternoon time periods. These four intersection locations selected for CO modeling are considered to be worst-case intersections that would likely experience the highest CO concentrations. The CO hot spots analysis in the 2003 AQMP did not predict a violation of CO standards at the four intersections. Of these four intersections, the busiest intersection evaluated was at Wilshire Boulevard and Veteran Avenue, which was described as the most heavily congested intersection in Los Angeles County, with an average daily traffic volume of approximately 100,000 vehicles per day. No intersection or roadway around the campus would exceed 100,000 vehicles per day. Additionally, the Proposed Project would not substantially change circulation or increase idling at pick-up and drop-off areas. Rather, the Proposed Project would develop a new through parking lot that connects 14th Street and 16th Street that also includes an internal pick-up and drop-off area on the campus. While this would change circulation patterns, it would likely reduce idling time on adjacent streets by improving the efficiency of student pick-up and drop-off. As such, the Proposed Project would not generate CO concentrations above CO standards at any intersection or roadway within the campus area.

Summary

Localized emissions during construction and operation of the Proposed Project would not exceed the applicable LSTs. Health risk due to TACs would be minor and sources of emissions would be at a sufficient distance such that they would not result in health effects on nearby sensitive receptors. Since the Proposed Project would not generate any operational vehicle trips and would generate a few construction-related trips, the Proposed Project would not result in traffic volumes at intersections around the campus that would exceed 100,000 vehicles per day and would

not contribute to CO concentrations that exceed standards. Therefore, this impact would be less than significant and no mitigation is required.

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

Less-than-significant Impact. According to SCAQMD, an air quality impact would be significant if implementation of the Proposed Project would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The occurrence and severity of odor impacts depends on numerous factors, including: the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the affected receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generate citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose a substantial number of people to objectionable odors would have a significant impact.

Odors resulting from construction of the Proposed Project are not likely to affect a substantial number of people because construction activities usually do not emit offensive odors. Potential odor emitters during construction activities include heavy-duty diesel equipment exhaust, asphalt paving, and architectural painting activities. SCAQMD Rule 402 prohibits the discharge of air contaminants that cause nuisance or annoyance to the public, including odors; SCAQMD Rule 1108 limits the amount of VOC emissions from cutback asphalt; and Rule 1113 limits VOC content of architectural coatings. Given mandatory compliance with SCAQMD rules, no construction activities or materials are proposed that would create a significant level of objectionable odors.

Similarly, odors resulting from operation of the Proposed Project are not likely to affect a substantial number of people because the Proposed Project does not include land uses typically associated with objectional odors. 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 areas, refineries, landfills, dairies, and fiberglass molding facilities. The Proposed Project does not include any uses identified by SCAQMD as being associated with odors and therefore would not produce objectionable odors. Operations would result in minor levels of odors from diesel-fueled delivery trucks as well as any food preparation similar to existing conditions. Odors generated by trucks are minor and temporary, and odors from kitchens are not typically considered to be objectionable.

No major existing sources of odors have been identified in the campus vicinity. Both the Proposed Project's construction and operation are not anticipated to frequently expose nearby sensitive receptors to substantial objectionable odors. Thus, this impact would be less than significant, and no mitigation is required.

3.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources.				
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. 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 the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒

3.4.1 Environmental Setting

The campus is fully developed with an existing elementary school in an urbanized area of the City. The closest naturalized areas are the Pacific Ocean and Santa Monica mountains, approximately 1.3 miles and 4 miles from the campus, respectively. Vegetation on the campus is limited to ornamental trees distributed throughout the campus, as well as grass areas, hedges, and other ornamental landscaping. Additionally, street trees are present along 14th Street, 16th Street, and Maple Street adjacent to the campus. The City designates Heritage Trees and Landmark Trees through their respective programs. Trees designated under the City's Heritage Tree program are not subject to regulatory restrictions, but rather serve as educational opportunities for the community (City of Santa Monica 2017). On the other hand, trees designated as Landmark Trees are protected from removal by the City's Landmark Ordinance, unless they become diseased or pose a risk to public safety. There currently are only four Landmark Trees

in the City (City of Santa Monica 2017), none of which are on the campus or in the campus vicinity. Similarly, there are no Heritage Trees on the campus, with the closest designated tree approximately 800 feet south of the campus on 16th Street between Oak Street and Hill Place North (City of Santa Monica 2020).

Given the urbanized location of the Will Rogers campus, there are no state or federally protected wetlands, riparian habitat, or other sensitive natural communities present within or in the vicinity of the campus. Based on observations from a site visit conducted on February 3, 2022, and a review of aerial imagery, no native or naturally occurring vegetation communities are present on the campus or surrounding area that could provide habitat for any candidate, sensitive, or special-status wildlife species. The City of Santa Monica is not within the boundaries of an adopted local, regional, or state habitat conservation plan (CDFW 2019).

3.4.2 Discussion

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 the U.S. Fish and Wildlife Service?

Less-than-significant Impact. As discussed in Section 3.4.1, the campus is located within an urbanized area and fully developed with an existing elementary school, consisting of various buildings and structures, landscaping, and hardscaping. Because the vegetation on the campus is limited to ornamental landscaping, it does not support habitat for any candidate, sensitive, or special-status wildlife species. Therefore, impacts from the Proposed Project related to effects on sensitive species would be less than significant and no mitigation is required.

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 the U.S. Fish and Wildlife Service?

No Impact. The campus is completely developed as an operating school, and all areas on the campus are either paved or graded. Because the vegetation on the campus is limited to ornamental landscaping and turf, and there is no sensitive or riparian habitat on the campus that may potentially be inhabited by federally or state-listed biological species, the Proposed Project would not 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 U.S. Fish and Wildlife Service. No impact would occur, and no mitigation is required.

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

No Impact. No state or federally protected wetlands are present within or adjacent to the campus. The Proposed Project would occur entirely within the existing developed school campus. Therefore, no impacts from the Proposed Project related to state or federally protected wetlands would occur, and no mitigation is required.

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 with Mitigation Incorporated. The campus is completely developed as an operating school and is either paved or graded. The campus and surrounding area do not contain any streams or bodies of water that may be inhabited by any native resident or migratory fish species. Additionally, the campus is within an urbanized area and therefore is not a migratory wildlife corridor. As such, the Proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species and would not affect wildlife corridors.

However, the Proposed Project would require the removal of ornamental trees from the campus to accommodate the proposed improvements to the campus which could provide potential nesting habitat for migratory birds and/or raptors protected under the federal Migratory Bird Treaty Act (MBTA). Sections 3503 and 3503.5 of the California Fish

and Game Code (CFCG) prohibit the take or destruction of migratory birds and raptors, their nests, and/or eggs. Direct impacts on nesting birds protected by the MBTA and similar provisions of the CFCG could occur if work is conducted during the general avian breeding season (January 15 through August 31) and includes the removal of any ornamental vegetation containing active nests. No native or protected tree species would be removed. In the event tree removal occurs during the general bird breeding season (January 15 to August 31), the Proposed Project has the potential to result in direct impacts on nesting birds protected under the MBTA and CFCG. Additionally, noise-generating construction activities in proximity to onsite trees as well as the adjacent street trees along 14th Street, 16th Street, and Maple Street could potentially result in indirect impacts such as disturbance to nesting birds. Therefore, construction of the Proposed Project would result in potentially significant impacts on nesting migratory birds and raptors. However, implementation of mitigation measure MM-BIO-1 would reduce this potentially significant impact to a less-than-significant level.

Once the Proposed Project's construction is complete, the campus would continue to operate as an elementary school, similar to existing conditions. There would be no increases in student enrollment or the number of faculty as a result of the Proposed Project, and therefore would not introduce any new sources of operational noise. Additionally, the Proposed Project would include planting of new trees on the campus, which would provide additional nesting opportunities for migratory birds and raptors onsite. Therefore, no operational impacts on nesting migratory birds or raptors would occur.

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

Less-than-significant Impact. As discussed in Section 3.4.1, the campus is fully developed with an operating school and does not contain any suitable habitat for special-status plant and wildlife species. In addition, it is not anticipated that any special-status plant or wildlife species are present in the campus vicinity given the urbanized nature of the area. As such, the Proposed Project would not result in a conflict with any local policies or ordinances protecting special-status plant and wildlife species.

The Proposed Project would not result in any impacts on Heritage or Landmark Trees as there are none within or adjacent to the campus that would be affected. However, the adjacent street trees located along 14th Street, 16th Street, and Maple Street are protected under the City's Tree Code (Chapter 7.40 of the City's Municipal Code), which protects any tree, shrub, or plant in any street, sidewalk, parkway, alley, or other public property within the City from damage during the erection, repair, alteration or removal of any building, house, or structure. The Proposed Project includes the removal of trees from the campus but does not propose to remove any trees within the public right-of-way along 14th Street, 16th Street, or Maple Street. Although construction activities during Phases 1, 2, and 3 would occur adjacent to the nearby street trees, the District would protect these trees in accordance with the City's Tree Code. Adherence to the City's Tree Code would ensure that the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.

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

No Impact. Because the City is not within the boundaries of an adopted local, regional, or state habitat conservation plan (CDFW 2019), the Proposed Project would not 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 would occur, and no mitigation is required.

Mitigation Measures

MM-BIO-1: Conduct Preconstruction Nesting Bird Surveys

To comply with the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFCG) sections 3503 and 3503.5 and to avoid potential impacts to migratory bird species, the District will retain a qualified biologist to conduct a pre-construction survey if removal of vegetation and construction must occur on the campus during the

general nesting bird breeding season (January 15 to August 31). The purpose of the pre-construction surveys would be to determine the presence or absence of nesting birds in the proposed area of disturbance onsite or any ornamental vegetation (i.e., Eucalyptus trees) adjacent to the campus. The pre-construction survey shall be conducted within 7 calendar days prior to the start of construction activities (including removal of vegetation). If nesting birds are detected, to ensure that direct and indirect disturbance of breeding activities is avoided, the qualified biologist shall set up appropriate avoidance construction buffers from the nest and visit the site weekly until it is determined that the fledglings are no longer dependent on the nest. Construction may be delayed until the end of the breeding season or until the fledglings are no longer dependent on the nest.

3.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources.				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Substantially disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

3.5.1 Environmental Setting

RECORDS SEARCH

A cultural resources records search was completed at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System on July 8, 2022 (File No. 23790.9956). The results of the SCCIC search revealed no archaeological resources, built-environment resources, or previous reports within the campus. Three previously recorded historic-period built-environment features have been recorded outside of the campus but within the quarter-mile search radius. Six cultural reports have been conducted outside of the campus but within the search radius.

HISTORICAL SETTING

The historical resources setting is summarized from the *Will Rogers Learning Community Historic Resources Inventory Report* (Historic Resources Group 2022a), which is included as Appendix B1 of this IS/Proposed MND. The Will Rogers Learning Community was designed by master architect Henry L. Gogerty in 1948 and developed in the post-World War II era.

The site features 13 permanent buildings as well as athletic facilities, open spaces, and artworks. The buildings and features of the Will Rogers Learning Community campus have been evaluated collectively for their potential eligibility for listing as a historic district in the National Register of Historic Places, the California Register of Historical Resources (CRHR), and at the local level as a City of Santa Monica Landmark. The Will Rogers Learning Community is recommended eligible under CRHR Criterion 1 and the City of Santa Monica under Criterion 1 within the context of the post-World War II institutional development of Santa Monica. The school represents broad patterns of institutional history, and Will Rogers Learning Community reflects the rapid growth of the city, neighborhood of Sunset Park, and the school district during this period of development.

Will Rogers Learning Community is also recommended eligible under CRHR Criterion 3 and City of Santa Monica Criteria 4 and 5 for its design. The school campus embodies the distinctive characteristics of a type, period, and method of construction, notably that of the International-style buildings from master architects following the post-World War II expansion in Santa Monica.

The period of significance for the Will Rogers Learning Community spans from 1948 to 1950, which includes the original period of development for the campus following the culmination of World War II. Contributing features are those buildings that were constructed during the period of significance and retain their integrity. Will Rogers Learning Community contains a cohesive concentration of 13 contributing buildings, three contributing site features, and one contributing additional feature that date from the period of significance and contribute to the historic district. The quads and courtyards are contributors due to their spatial organization as they convey the designs envisioned by Henry L. Gogerty and Joe M. Estep. Table 3.5-1 identifies the contributing buildings and features, along with their integrity.

Table 3.5-1 Features Included in the Historic District

Current Feature Name	Year Built	Integrity	Status
Buildings			
Building A	1948	Fair	Contributor
Building B/C	1948	Fair	Contributor
Building D	1948	Good	Contributor
Building E	1948	Good	Contributor
Building F	1948	Good	Contributor
Building G	1948	Good	Contributor
Building H	1948	Good	Contributor
Building J	1948	Good	Contributor
Building K	1950	Good	Contributor
Building L	1948	Fair	Contributor
Building M	1950	Good	Contributor
Building N	1950	Good	Contributor
Building P	1950	Good	Contributor
Site Features			
Courtyards	1948	Good	Contributor
14th Street Quad	1948	Fair	Contributor
Stone Planters	1948	Very Good	Contributor
Additional Features			
"Will Rogers Elementary School" Sign	1948	Very Good	Contributor

In addition to considering the campus as a historic district, the buildings and features of the Will Rogers Learning Community campus were individually considered for potential eligibility. For a building or feature of the Will Rogers Learning Community to be historically significant as an individual historical resource, it must possess historic significance separate and apart from the other buildings and features on the campus. No buildings were found individually eligible for listing in the CRHR or for local designation.

John Adams Middle School, located across 16th Street from the campus, has been previously identified as a significant historic resource and is recommended eligible as a historic district in the CRHR and as a Santa Monica Landmark under Criteria 1/1 and 3/4-5, respectively. The school was found significant for its association with the PWA development in the 1930s; its cohesive design using the new "Santa Monica Plan"; and its PWA Moderne-style buildings designed by master architects Marsh, Smith & Powell.

3.5.2 Discussion

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

Less-than-significant Impact. This impact analysis is summarized from the *Will Rogers Learning Community Historic Resources Technical Report* (Historic Resources Group 2022b), which is included as Appendix B2 of this IS/Proposed MND.

The Proposed Project includes demolition of four contributors to the historic district: Buildings M, N, P, and K. These contributors are smaller than the majority of contributing buildings (approximately 1,000 square feet each; collectively approximately 4,000 square feet) and are located along the northern periphery of the historic district. For this reason, these four contributors do little to define the historic plan of the historic district, nor are they responsible for delineating the interstitial open spaces, such as the central courtyards, that define the spatial relationships and circulation paths of the historic district. The remaining contributors comprise approximately 44,050 square feet, retaining approximately 90 percent of the historic district. Following demolition of the four contributing buildings and implementation of all phases of the Proposed Project, the historic district would retain those contributors that create its significant plan, massing, spatial relationships, characteristics, and design. The overall integrity of the historic district would be retained following implementation of the Proposed Project, and the individual components would collectively continue to convey the historic significance of the historic district. Thus, the historic district would retain significant aspects of integrity and would remain eligible for listing in the CRHR and for designation as a City of Santa Monica Landmark under Criteria 1/1 and 3/4-5, respectively. Therefore, the demolition of the four contributing resources does not represent a significant impact on historical resources.

The Proposed Project also includes construction of new buildings on the existing campus. The new buildings would be situated outside of the historic district and would be separated from the contributors by open spaces and/or landscaping. For this reason, new construction would not destroy historic materials, features, and or spatial relationships that characterize the historic district, nor affect the spatial relationships between contributing buildings. New construction would be differentiated from the old and compatible with the historic district's materials, features, size, scale and proportion, and massing. Thus, the essential form and integrity of the historic district would be unimpaired if the new construction were to be removed in the future.

The Proposed Project also includes the rehabilitation of several contributors to the historic district: Buildings A, B/C, D, E, F, G H, and J. These alterations would involve the removal of some original windows and doors as well as the installation of vertically retracting glass doors that open to outdoor classroom spaces. The vertically retracting glass doors are designed to be compatible with, but differentiated from, the original windows and doors.

The Proposed Project would also renovate the courtyard areas between existing Buildings E, F, G, H, and J into outdoor classrooms. The spatial relationship of the courtyards with the surrounding buildings was found to contribute to the overall design and feeling of the historic district. While the Proposed Project would update these spaces, they would retain their overall feeling of open space relationship to the surrounding buildings.

The rehabilitation of structures would retain the majority of the character-defining features on contributing buildings and would preserve the features which convey the historical and architectural values. In compliance with BP 7113, the rehabilitation and adaptive reuse of identified historical resources on the Will Rogers campus would be consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation*. Therefore, the Proposed Project would not result in a major change to the physical significance of contributors to the historic district on the campus.

No demolition, construction, or rehabilitation is proposed that would reduce the integrity or significance of the John Adams Middle School located across 16th Street from the Will Rogers Learning Community. The Proposed Project would not add significant height or density that would create shadows or otherwise impact the setting or other characteristics of historical resources in the vicinity, specifically John Adams Middle School.

Therefore, for the reasons discussed above, the Proposed Project would not cause a substantial adverse change in the significance of a historical resource and impacts would be less than significant.

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

Less than Significant with Mitigation Incorporated. The SCCIC records search results indicate that no previously conducted studies or previously recorded archaeological sites were identified within the campus. Additionally, only built-environment features have been identified within the quarter-mile search radius. Although the majority of the campus has already been subjected to grading activities associated with existing development, the campus may still contain buried deposits in undeveloped areas and in sediments that are located beneath the previous level of disturbance. Construction of the Proposed Project would involve ground disturbance, earthwork, and excavation across portions of the site. Therefore, there is a potential for unknown buried resources to be uncovered during ground-disturbing activities, and impacts are considered potentially significant. However, implementation of mitigation measure **MM-CUL-1** would reduce this impact to a less-than-significant level.

c) Substantially disturb human remains, including those interred outside of formal cemeteries?

Less-than-significant Impact. There is no evidence of human remains on the campus, and the potential for the inadvertent discovery of human remains on the campus is very low because there is no evidence of any historical camps or human settlement on the campus. Additionally, existing regulations through Health and Safety Code section 7050.5 et seq. state that if human remains are discovered during the Proposed Project's construction, no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin. Further, pursuant to PRC section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition of the remains has been made. If the County Coroner determines the remains to be Native American, the NAHC shall be contacted within a reasonable time. Subsequently, the NAHC shall identify the most likely descendant (MLD). The MLD shall then make recommendations and engage in consultations concerning the treatment of the remains as provided in PRC section 5097.98. Given the very low potential for human remains on the campus and required compliance with existing regulations pertaining to the discovery of human remains, the Proposed Project would result in less than significant impact to human remains. No mitigation is required.

Mitigation Measures

MM-CUL-1: Archaeological Contingency Measures During Construction

In the event that a prehistoric archeological site (such as any unusual amounts of stone, bone, or shell) or a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, the contractor shall halt all ground-disturbing activity within 50 feet of the discovery. The contractor will notify the District of the potential find and the District shall retain a qualified archeologist to investigate its significance. If the find is a prehistoric archeological site, the culturally and geographically affiliated Native American group shall be notified by the District for their input on the preferred treatment of the find. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

3.6 ENERGY

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

3.6.1 Environmental Setting

ENERGY TYPES AND SOURCES

California relies on a regional power system comprised of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. One-third of energy commodities consumed in California is natural gas. In 2018, approximately 34 percent of natural gas consumed in the State was used to generate electricity. Large hydroelectric projects generated approximately 11 percent of the electricity used by the State, and renewable energy from solar, wind, small hydroelectric, geothermal, and biomass combustion generated 31 percent (CEC 2020).

Southern California Edison (SCE) is the electricity provider for the City of Santa Monica and the campus. In 2020, SCE's grid electricity supply consisted of 30.9 percent renewable resources, which included solar, wind, hydroelectric, geothermal, biomass, and biowaste (SCE 2020).

Commercial buildings represent just under one-fifth of U.S. energy consumption with office space, retail, and educational facilities representing about half of the overall commercial sector energy consumption. In aggregate, commercial buildings consumed 47 percent of building energy consumption and approximately 18 percent of U.S. energy consumption.

Petroleum products (gasoline, diesel, jet fuel) are consumed almost exclusively by the transportation sector, and account for almost 99 percent of the energy used in California by the transportation sector, with the rest provided by ethanol, natural gas, and electricity (BTS 2015). In 2021, 13.8 billion gallon of gasoline fuel was sold (CEC 2022). Gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet specific formulations required by CARB (EPA 2021).

Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many alternative transportation fuels (e.g., biodiesel, hydrogen, electricity, and others). Use of alternative fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, Assembly Bill [AB] 32 Scoping Plan).

APPLICABLE PLANS AND REGULATIONS

Warren-Alquist Act

The 1975 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the California Energy Commission (CEC). The Act established state policy to reduce wasteful,

uneconomical, and unnecessary uses of energy by employing a range of measures. The California Public Utilities Commission (CPUC) regulates privately owned utilities in the energy, rail, telecommunications, and water sectors.

State of California Energy Action Plan

CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The current plan is the 2019 California Energy Action Plan which was published in November 2019. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs; and encouragement of urban design that reduces vehicle miles traveled (VMT) and accommodates pedestrian and bicycle access (CEC 2019).

Legislation Associated with Electricity Generation

The State has passed legislation requiring the increasing use of renewables to produce electricity for consumers. California utilities are required to generate 33 percent of their electricity from renewables by 2020 (SB X1-2 of 2011); 52 percent by 2027 (SB 100 of 2018); 60 percent by 2030 (also SB 100 of 2018); and 100 percent by 2045 (also SB 100 of 2018). This legislation is expected to increase the renewable energy resources sold to retail customers, which will improve the efficiency of District-related electricity consumption over time.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

District Green Building Policies

The District's Green School Operations Board Policy (BP 3510[a]) identifies green building practices, sustainable operations, and environmentally preferable purchasing as key District priorities.

The District's Sustainable Design Criteria provide robust green building requirements that are applied to all construction and modernization projects. The criteria are based on the Collaborative for High Performance Schools (CHPS) framework and guidance from the Leadership in Energy and Environmental Design (LEED) rating system. The District's design standard goals are based on a progressively more aggressive achievement of CHPS levels through 2030:

- All new buildings and major renovations to exceed the minimum CHPS Designed qualifying point count by 25 percent by 2020;
- All new buildings and major renovations to achieve CHPS Verified by 2025; and
- All new buildings and major renovations to achieve CHPS Verified Leader by 2030.

Additionally, the District's green building requirements include compliance with the California Building Standards Code (California Code of Regulations, Title 24) Part 6, California Energy Code and Part 11, California Green Building Standards Code (CALGreen) for Nonresidential uses. As described in its Districtwide Plan for Sustainability (District 2019), the District is committed to designing its new construction and major renovation projects to exceed regulatory code requirements and strives to align with the regulatory code commitments by the City of Santa Monica, specifically including the following:

- All new buildings shall be designed to use ten percent less energy than the allowed energy budget established by the 2016 California Energy Code by 2020;
- Adopt CA Green Building Standards Chapter 11, Title 24 (CALGreen) Nonresidential Tier 2 Voluntary Measures as mandatory by 2025;
- All new buildings shall be Zero Net Energy (ZNE) by 2030; and 50 percent of existing buildings to be retrofitted to ZNE by 2030.

Districtwide Plan for Sustainability

The District adopted the Districtwide Plan for Sustainability (Sustainability Plan) on March 21, 2019. The Sustainability Plan provides a strategic roadmap for formalizing and uniting the District's many existing sustainability initiatives; incorporating sustainability into Education Services and all aspects of student learning; and integrating climate protection, resource efficiency, waste management, and other sustainability practices into District operations. The Sustainability Plan is organized into the eight sustainability focus areas: climate, solid waste, water, transportation, food, nutrition and wellness, energy and renewables, and education and engagement. Each category has specific implementation strategies and goals to be reached by 2020, 2025, and 2030.

Specific to energy consumption, the measures related to energy efficiency and renewable energy production include the District green building policies (described above). The District energy goals include reducing energy consumption by 30 percent (compared to 2017–18 baseline) and generating 35 percent of the District's electrical needs from solar. Currently, solar panels on nine elementary school sites provide 13 percent of the District's electricity needs (District 2019).

3.6.2 Discussion

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. Appendix F of the State CEQA Guidelines requires the consideration of the energy implications of a project. CEQA requires mitigation measures to reduce "wasteful, inefficient and unnecessary" energy usage (PRC section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with CCR Title 24 Energy Efficiency Standards would result in energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. The following sections describe the anticipated energy consumption from construction and operation-related activities of the Proposed Project and design features that would be implemented to reduce the consumption of energy resources. Note that the energy consumption presented in Tables 3.6-1 and 3.6-2 was estimated using preliminary site plans based on the Will Rogers Learning Community Campus Master Plan (September 1, 2020). Since then, refinements have been made to certain Proposed Project components, including some changes in square footages. These changes do not alter the conclusions presented in the analysis below.

Construction-Related Energy

Energy would be required to construct, operate, and maintain construction equipment and to produce and transport construction materials associated with construction and renovation of the Proposed Project. The Proposed Project would be constructed in four phases which would occur intermittently from 2023 to 2030. The one-time energy expenditure required to construct the physical buildings and infrastructure associated with the Proposed Project would be nonrecoverable. Most energy consumption would result from operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks supplying materials. Table 3.6-1 provides an estimate of fuel needed for construction activities.

Table 3.6-1 Proposed Project's Construction Energy Consumption

Phase	Diesel (Gallons)	Gasoline (Gallons)
1	23,591	7,880
2	17,473	1,602
3	24,071	1,081
4	28,338	2,255
Total	**93,473**	**12,818**

Notes: Gasoline gallons include on-road gallons from worker trips. Diesel gallons include off-road equipment and on-road gallons from hauling and vendor trips.

Source: Calculations by Ascent Environmental in 2022.

Although construction activities would require fuel and other energy sources, increases would be temporary. Construction contractors strive to complete construction projects in an efficient manner to meet the Proposed Project's schedules and minimize cost. Thus, impacts related to construction energy use would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Building Energy

The Proposed Project would primarily include modernizing and renovating existing buildings, building new buildings, playgrounds, parking lots and a cafeteria. For the most part, modernization and renovation activities would reduce building energy consumption, as many of the buildings undergoing renovation are many decades old and built consistent with older (or non-existent) building energy standards. The newly constructed buildings would also consume energy but would be more efficient than current buildings. Once constructed, operation of the Proposed Project's buildings would be typical regarding the use of electricity and natural gas for lighting, space and water heating, air conditioning, appliances, and landscape maintenance activities. The buildings would also be installed with energy management systems (EMS) to allow control on the campus. Wireless thermostats would be connected to the EMS system.

Indirect energy use would include wastewater treatment and solid waste removal. For purposes of analysis, it was assumed that the only increase in energy consumption would be associated with the newly constructed buildings, which would replace 15 existing portable and permanent buildings. The anticipated electricity and natural gas consumption associated with operation of the Proposed Project is provided in Table 3.6-2.

Table 3.6-2 Proposed Project's Operational Energy Consumption

Land Use/Energy Type	Energy Consumption	Units
Elementary School Buildings		
Electricity	684	MWh/year
Natural Gas	27,358	MMBtu/year

Notes: MWh/year = megawatt-hours per year; MMBtu/year = million British thermal units per year.

Source: Calculations by Ascent Environmental in 2022.

The new buildings would be constructed in accordance with the requirements of the applicable building codes (e.g., Title 24), and would allow for future installation of solar panels, which include minimum requirements for energy efficiency performance. However, if solar panels are not installed, the District would opt to receive a higher tier of sustainable energy supplies to the school to ensure a similar reduction in the use of fossil fuels. New lighting and HVAC units would meet or exceed Title 24 standards. High efficiency plumbing fixtures, including faucet aerators ,, would also be installed in the new constructed buildings. Landscaping would consist of drought-tolerant and native plants that support local biodiversity and minimize water use. For these reasons, it is not anticipated that the Proposed Project's energy consumption would be greater than existing conditions and would likely represent a decrease in energy consumption.

Transportation Energy

The construction and renovation activities associated with the Proposed Project would not increase the student capacity or number of faculty at the school campus and therefore would not result in an increase in the current VMT generated by the school. Regardless, new bicycle parking and lockers would be provided to comply with the Title 24 and CHPS requirements. Therefore, there would not be any transportation energy consumption due to the Proposed Project.

Summary

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. Construction activities would consume the necessary amount of fuel/energy to complete work in an efficient and timely manner.

According to Appendix F of the State CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall per capita energy consumption, decreasing reliance on oil, and increasing reliance on renewable energy sources. The Proposed Project's energy consumption for building operation would support these goals due to the effects of existing State laws and requirements. For example, the Proposed Project would comply with the minimum energy performance standards of the California Building Code and new buildings would be designed to allow for the future installation of solar panels, which decrease per capita (or per employee) energy consumption. The Proposed Project would also support per capita energy consumption decreases through its uses of grid electricity, which is required by State legislation (e.g., SB 100) to source at least 60 percent of its supplies from renewable energy sources by 2030 and 100 percent carbon-free sources by 2045. Since the Proposed Project would not result in an increase in VMT, there would not be an increase in transportation-related energy consumption. The Proposed Project would not develop uses or involve activities that would conflict with goals of decreasing per capita energy consumption, decreasing reliance on oil (petroleum), or increasing uses of renewable energy sources, or that would result in wasteful, inefficient, or unnecessary consumption of energy. This impact would be less than significant, and no mitigation is required.

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

Less-than-significant Impact. Relevant plans that pertain to the efficient use of energy include the State's Energy Efficiency Action Plan, which focuses on energy efficiency and building decarbonization (CEC 2019), and the District Sustainability Plan, all of which seek to conserve energy resources through energy efficiency and renewable energy. Section 3.6.1 provides a summary of these plans.

As discussed in Section 3.6.2(a), although implementation of the Proposed Project would result in the overall increase in consumption of energy resources during construction and operation of the new buildings and cafeteria, the Proposed Project's energy consumption would benefit from, and not conflict with, various State laws and requirements related to increasing use of renewable energy and using energy more efficiently, including the California Building Code, and SB 100 requirements to increase the amount of electricity generated from renewable and carbon-free energy sources. The installation of solar panels would also reduce the reliance on fossil fuels-based energy, and implementation of CHPS standards will reduce energy consumption. The Proposed Project would not conflict with State's Energy Efficiency Action Plan or the District's Sustainability Plan goals to use energy more efficiently. Therefore, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant, and no mitigation is required.

3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils.				
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey 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, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

3.7.1 Environmental Setting

The geologic setting information in this section was obtained from the geotechnical investigation that was completed for the new early education/kindergarten classroom building included as part of Phase 1 of the Proposed Project (Converse Consultants 2021). Although the geotechnical investigation specifically addressed the proposed location of the new early education/kindergarten classroom building, similar geologic and soil conditions are expected throughout the campus. Information related to paleontological resources was obtained from the paleontological resources records search completed in 2018 for the John Adams Middle School Auditorium Replacement Project

(McLeod 2018), located across 16th Street at John Adams Middle School. Because of the campus' proximity to the auditorium, the paleontological conditions are expected to be the same at the Will Rogers campus.

GEOLOGY AND SOILS

The site is located in the northwest portion of the Los Angeles Basin along the northern boundary of the Peninsular Ranges geomorphic province and the southern margin of the Transverse Ranges geomorphic province. The Los Angeles basin is situated at the junction of two major convergent fault systems. The first group includes the northwest-trending high angle strike slip faults of the San Andreas system projecting northward from the northern terminus of the Peninsular Ranges province. The second group includes the east-west trending low angle reverse or reverse-oblique faults bounding the southern margin of the Transverse Range province. At the site location, it is estimated that pre-Quaternary sedimentary formations lie at least 350 to 400 feet below ground surface (bgs). Overlying those formations are younger relatively less deformed, sub-horizontally stratified, Quaternary aged sediments varying from marine sands, wind-blown dune deposits to alluvial sands, gravely sands, silts and clays. The shallowest sediments in the site vicinity are Quaternary (< 11,000 years old) fan deposits that were laid down by streams flowing south from the Santa Monica Mountains.

The earth materials encountered consist of existing fill soils placed during previous site grading operations and natural alluvial soils to a maximum depth of 51.5 feet bgs. The fill soils encountered consists primarily of silty sands. The fill soils encountered in the soil borings were approximately 3 to 5 feet thick and were from previous site grading. The alluvial soil deposits below the fill consist of poorly graded sand with silt. Groundwater was not encountered during the subsurface exploration to the deepest depth drilled of 51.5 feet bgs. Based on review of Historically Highest Groundwater Map, the historic high groundwater level contour of about 40 feet below the ground surface was noted from wells and soil borings information in the vicinity of the site. The groundwater level beneath the site can vary depending upon the seasonal precipitation and groundwater basin activities including recharge, storage and pumping occurring in the general site vicinity.

GEOLOGIC HAZARDS

The potential for geologic hazards to occur at the Will Rogers campus are summarized below.

Seismic Ground Shaking

The campus is situated in a seismically active region. The Los Angeles basin is bounded by active regional faults on all sides and underlain by alluvial sediments and buried thrust faults. Accordingly, the seismic hazard for the Los Angeles basin is high. There are several active faults in proximity to the Will Rogers campus that have potential to result in seismic ground shaking at the campus. Faults are considered to be active if there has been evidence of seismic activity within the last 10,000 years. The closest known faults to the campus with mapped surface traces are the Santa Monica Fault (approximately 1.4 miles to the northwest and north) and Malibu Coast Fault (approximately 3.3 miles to the west).

Surface Rupture

Surface rupture is the visible offset of the ground surface when an earthquake rupture along a fault affects the Earth's surface. The campus is not located within a currently designated State of California Earthquake Fault Zone (formerly Alquist-Priolo Special Studies Zone) for surface fault rupture. No surface faults are known to project through or towards the site. Therefore, the potential for surface rupture at the campus is considered very low.

Liquefaction

Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. Saturated soils behave temporarily as a viscous fluid (liquefaction) and, consequently, lose their capacity to support the structures founded on them. Effects of severe liquefaction can include sand boils, excessive settlement, bearing capacity failures, and lateral spreading. The site is not located within a mapped liquefaction zone

per the State of California Seismic Hazard Zones Map for the Beverly Hills Quadrangle. As such, the geotechnical investigation determined that liquefaction hazards at the Will Rogers campus are low.

Settlement

Seismically induced settlement consists of dry dynamic settlement (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily within loose to moderately dense sandy soil due to reduction in volume during and shortly after an earthquake event. The Will Rogers campus was determined to have the potential for dry seismic settlement of up to 0.25 inches based on an analysis of the subsurface soil profile.

Landslides

According to the CGS, the campus is not within a landslide zone (CGS 2021). In addition, the topography of the campus is relatively flat. Therefore, the potential for landslides is considered low.

Lateral Spreading

Seismically induced lateral spreading involves primarily lateral movement of earth materials due to ground shaking. It differs from the slope failure in that complete ground failure involving large movement does not occur due to the relatively smaller gradient of the initial ground surface. The topography at the campus and immediate vicinity is relatively flat, with no significant nearby slopes or embankments. As a result, the potential for lateral spreading at the campus is considered negligible.

Seismically-Induced Slope Instability

Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes. The campus is relatively flat. In the absence of substantial ground slopes, there is no potential for seismically induced landslides to affect the campus.

Subsidence

Regional ground subsidence generally occurs due to rapid and intensive removal of subterranean fluids, such as water or oil. Based on the geologic hazards review for the John Adams Middle School Auditorium Replacement Project located directly across 16th Street from the campus, there have been no reports on regional subsidence documented in the vicinity of the Will Rogers campus (McLeod 2018). In addition, the Proposed Project would not involve the removal of water or oil at the site. For these reasons, the potential for ground subsidence is low.

Expansive Soils

Expansive soils contain large amounts of clay particles that swell considerably when wetted and shrink with the loss of water. Foundations and structures constructed on these soils can be subject to uplifting forces caused by the swelling, potentially resulting in heaving and cracking of both building foundations and slabs-on-grade. The results of soil testing completed as part of the geotechnical investigation indicate that onsite soils have a very low expansion potential.

PALEONTOLOGICAL RESOURCES

The campus is within an area that has been previously developed and is predominately underlain by fill materials, and is located directly across 16th Street from John Adams Middle School. Given the proximity between the campus and John Adams Middle School, it is anticipated that paleontological resources conditions would be similar on the Will Rogers campus. Based on the paleontological resources records search completed in 2018 for the John Adams Middle School Auditorium Replacement Project, surface-mapped geological units in this area consist of nominally older Quaternary Marine Terraces that also have an admixture of terrestrial fluvial deposits. In this vicinity, these deposits typically do not contain significant vertebrate fossils in the very uppermost layers, but at relatively shallow depth could contain significant fossil vertebrate remains (McLeod 2018).

According to the records search results letter from the Los Angeles County Natural History Museum, two vertebrate fossil localities have been discovered in older Quaternary age sedimentary deposits in the area surrounding the Will

Rogers campus. Northeast of the campus, along Michigan Avenue east of Cloverfield Boulevard, LACM 5462 produced a right dentary, or jawbone, of an extinct lion (*Felis atrox*), at a depth of 6 feet below the ground surface (bgs) (McLeod 2018). East-southeast of the campus, fossil specimens of horse (*Equus*) and ground sloth (*Paramylodon*) were discovered at locality LACM 7879 at a depth of over 11 feet bgs (McLeod 2018). Shallow excavations (less than 5 feet bgs) are unlikely to yield fossils due to the disturbed and weathered nature of the surficial deposits; however, there is potential for some fossilized remains to be encountered during grading within Will Rogers campus.

3.7.2 Discussion

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 California Geological Survey Special Publication 42.)

No Impact. As stated in Section 3.7.1, the campus is not within an Alquist-Priolo earthquake fault zone, and no surface faults are known to extend through or towards the campus. In addition, the geotechnical investigation determined that the potential for surface fault rupture to occur at the Will Roger campus is low. Therefore, the Proposed Project would have no impact related to earthquake fault rupture and no mitigation is required.

ii) Strong seismic ground shaking?

Less-than-significant Impact. As discussed in Section 3.7.1, the campus is not within an active fault zone but is in in a seismically active region and in proximity to several active faults that may cause strong seismic ground shaking in the event of an earthquake. The Proposed Project would involve the construction of three new building and renovations to several existing buildings on the campus. The design of all proposed new structures would be subject to the seismic-related standards and requirements of the California Building Code. The District would review Proposed Project's plans to ensure compliance with the latest version of the California Building Code. Additionally, the Proposed Project would be subject to review and plan approval by the Division of the State Architect (DSA). Compliance with the California Building Code, DSA review and approval, and District review would ensure that the Proposed Project would designed, constructed, and operated to minimize risks associated with strong seismic ground shaking to the extent feasible. Furthermore, because no active fault lines cross the campus, construction and operation of the Proposed Project would not exacerbate the potential for strong seismic ground shaking at the campus or in the surrounding area. Therefore, impacts related to strong seismic ground shaking would be less than significant, and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less-than-significant Impact. As discussed in Section 3.7.1, the campus is not within a mapped liquefaction zone, and the geotechnical investigation determined that liquefaction hazards are low. In addition, the Proposed Project would be subject to California Building Code requirements, DSA review and approval, and District review, which would ensure that the Proposed Project would be designed, constructed, and operated to minimize risks associated with seismic-related ground failure to the extent feasible, and would ensure that the Proposed Project would not exacerbate seismic-related ground failure, including liquefaction. For these reasons, impacts related to seismic-related ground failure would be less than significant, and no mitigation is required.

iv) Landslides?

No Impact. As discussed in Section 3.7.1, the campus is not within a landslide zone (CGS 2021). In addition, the areas surrounding the campus are relatively flat and highly developed. As such, an on-site or off-site landslide is unlikely. Therefore, impacts related to landslides would be less than significant, and no mitigation is required.

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

Less-than-significant Impact. Onsite soils would be particularly prone to erosion during excavation and site development associated with the Proposed Project's construction, especially if construction activities were to coincide with heavy rains. However, the potential for erosion would be minimized through implementation of best management practices (BMPs) for stormwater at construction sites, such as temporary catchment basins and/or sandbags, which would control runoff and contain sediment transport within the campus during construction. Because the Proposed Project would involve the disturbance of more than one acre of soil, the Proposed Project would be subject to the requirements of the Construction General Permit (Order 2009-0009-DWQ). The Construction General Permit requires the construction contractor to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). SWPPPs must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets.

During operation, the campus would be covered with structures, hardscape, landscaping, and appropriate drainage infrastructure, which would reduce onsite erosion. Therefore, substantial sedimentation and erosion would not occur during operation.

Based on the above discussion, impacts related to soil erosion would be less than significant, and no mitigation is required.

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

Less-than-significant Impact. As discussed in Section 3.7.1, the potential for landslides, lateral spreading, subsidence, liquefaction, or collapse to occur at the campus is considered low. The Proposed Project would be subject to California Building Code requirements, DSA review and approval, and District review. As required by the California Building Code, a site-specific geotechnical study would be completed prior to construction activities, which would provide design recommendations based on site conditions. These design recommendations would ensure that the Proposed Project would be designed, constructed, and operated to minimize risks associated with geologic hazards to the extent feasible, as well as ensure that the Proposed Project would not exacerbate geologic hazards at the site. For these reasons, impacts related to the instability of geologic units or soils would be less than significant, and no mitigation is required.

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

Less-than-significant Impact. As discussed in Section 3.7.1, the results of soil testing completed as part of the geotechnical investigation indicate that onsite soils have a very low expansion potential. Additionally, because of the developed nature of the campus, it is likely that any expansive soils have been removed during previous development of the site. However, a site-specific geotechnical analysis would be completed prior to construction activities to confirm soil conditions at the campus, including the potential for soil expansion. The Proposed Project would be required to comply with the requirements of the current California Building Code, and would incorporate standard engineering and earthwork construction practices, such as proper foundation design and proper moisture conditioning of earthen fills. In addition, the Proposed Project's design would incorporate the recommendations outlined in the geotechnical analysis, which would minimize any potential effects associated with expansive soils. Therefore, impacts related to risks associated with soil expansion would be less than significant.

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

No Impact. The Will Rogers campus connects to the City's existing sewer system and does not rely on septic tanks or alternative wastewater systems. The Proposed Project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, the Proposed Project would have no impact related to soils incapable of supporting these systems, and no mitigation is required.

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

Less than Significant with Mitigation Incorporated. As discussed in Section 3.7.1, the campus is located within an area that has been previously developed and is predominately underlain by fill materials. Additionally, the campus has been fully developed with a school since the late 1940s. As such, is not anticipated that the campus is underlain by unique paleontological resources. Nevertheless, while the campus and surrounding area have been heavily disturbed by urban development over the years, intact paleontological resources may be present below the original layer of fill material. Given the proximity and shallow depth of past fossil discoveries (i.e., 6 feet bgs) in the surrounding area and the underlying older alluvial deposits, the campus has a potential to contain paleontological resources.

In the event that paleontological materials are located on the campus, ground-disturbing activities associated with construction of the Proposed Project, such as grading during site preparation, have the potential to encounter unique paleontological resource or site. The potential to damage or destroy paleontological resources during construction would be a potentially significant impact. However, implementation of mitigation measure **MM-PALEO-1**, which requires a qualified paleontologist to conduct monitoring during specific ground-disturbing activities, would reduce potential impacts to less than significant.

Mitigation Measures

MM-PALEO-1: Paleontological Monitoring

Prior to the commencement of any onsite grading activity that extends 5 feet or greater in depth, the District will retain a qualified paleontologist. A qualified paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology of Los Angeles County, and who has worked as a paleontological monitoring project supervisor in the County for at least 1 year. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Proposed Project. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology (SVP) (2010). The qualified paleontologist shall attend pre-construction meetings to consult with the construction contractors regarding grading and excavation schedules, paleontological field techniques, and safety issues. A paleontological monitor, defined as an individual who has experience in the collection and salvage of fossil materials, shall work under the direction of the qualified paleontologist and be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed older Quaternary alluvial deposits, if encountered. These deposits may be encountered at depths as shallow as 5 feet below ground surface. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Fossil remains collected during the monitoring and salvage portion of the program shall be cleaned, repaired, sorted, and catalogued. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in a scientific institution with permanent paleontological collections, such as the Los Angeles County Natural History Museum.

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

3.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions.				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

3.8.1 Environmental Setting

SCIENTIFIC BASIS OF GREENHOUSE GASES AND CLIMATE CHANGE

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The earth has a much lower temperature than the sun; therefore, the earth emits lower frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead trapped, resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of GHGs in excess of natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcing (IPCC 2014:3, 5).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere (IPCC 2013:467).

The quantity of GHGs that ultimately result in climate change is not precisely known; but is enormous; no single project alone would measurably contribute to an incremental change in the global average temperature, or to global, local, or microclimates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

GREENHOUSE GAS EMISSION SOURCES

GHG emissions are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial, and agricultural emissions sectors (CARB 2017).

In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (CARB 2021). Emissions of CO_2 are byproducts of fossil fuel combustion. Methane, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Nitrous oxide is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution (CO_2 dissolving into the water), respectively, two of the most common processes for removing CO_2 from the atmosphere.

APPLICABLE PLANS AND REGULATIONS

Assembly Bill 32, the California Global Warming Solutions Act of 2006

In September 2006, the California Global Warming Solutions Act of 2006, Assembly Bill (AB) 32, was signed into law. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 also requires that (a) the statewide greenhouse gas emissions limit remain in effect unless otherwise amended or repealed, (b) the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020, and (c) [CARB] shall make recommendations to the Governor and the Legislature on how to continue reductions of greenhouse gas emissions beyond 2020 [California Health and Safety Code, Division 25.5, Part 3, Section 38551]. For the purposes of AB 32 and other legislation in California, GHGs are expressed in carbon-dioxide-equivalent (CO_2e). CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

Executive Order B-30-15

On April 20, 2015, Executive Order (EO) B-30-15 established a California GHG reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG reduction targets with those of leading international governments such as the 28-nation European Union, which adopted the same target in October 2014. California has met the target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (Assembly Bill 32, discussed above). California's new emission reduction target of 40 percent below 1990 levels by 2030 sets the next interim step in the State's continuing efforts to pursue the long-term target expressed under EO S-3-05 to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050. This target is in line with the scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius, the warming threshold at which major climate disruptions are projected, such as super droughts and rising sea levels.

Senate Bill 32 and Assembly Bill 197 of 2016

In August 2016, SB 32 and AB 197 were signed into law, which serve to extend California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continuing efforts to pursue the long-term target expressed in EOs S-3-05 and B-30-15 of 80 percent below 1990 emissions levels by 2050.

Climate Change Scoping Plan and Updates

In December 2008, CARB adopted its first version of its Climate Change Scoping Plan, which contained the main strategies California will implement to achieve the mandate of AB 32 (2006) to reduce statewide GHG emissions to 1990 levels by 2020. In May 2014, CARB released and subsequently adopted the First Update to the Climate Change

Scoping Plan to identify the next steps in reaching the goals of AB 32 (2006) and evaluate the progress made between 2000 and 2012 (CARB 2014). After releasing multiple versions of proposed updates in 2017, CARB adopted the next version titled California's 2017 Climate Change Scoping Plan (2017 Scoping Plan) in December of that same year (CARB 2017). The 2017 Scoping Plan indicates that California is on track to achieve the 2020 statewide GHG target mandated by AB 32 of 2006 (CARB 2017:9). It also lays out the framework for achieving the mandate of SB 32 of 2016 to reduce statewide GHG emissions to at least 40 percent below 1990 levels by the end of 2030 (CARB 2017). The 2017 Scoping Plan identifies the GHG reductions needed by each emissions sector.

The 2017 Scoping Plan also identifies how GHGs associated with proposed projects could be evaluated under CEQA (CARB 2017:101-102). Specifically, it states that achieving "no net increase" in GHG emissions is an appropriate overall objective of projects evaluated under CEQA if conformity with an applicable local GHG reduction plan cannot be demonstrated. CARB recognizes that it may not be appropriate or feasible for every development project to mitigate its GHG emissions to zero and that an increase in GHG emissions because of a project may not necessarily imply a substantial contribution to the cumulatively significant environmental impact of climate change. The latest 2022 Scoping Plan Update aims to assess progress towards achieving the Senate Bill 32 2030 target and lay out a path to achieve carbon neutrality by no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

Senate Bill X1-2, the California Renewable Energy Resources Act of 2011 and Senate Bill 350, the Clean Energy and Pollution Reduction Act of 2015

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB X1-2 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 20 percent of their electricity from renewables by December 31, 2013; 25 percent by December 31, 2016; and 33 percent by December 31, 2020. SB X1-2 also requires the renewable electricity standard to be met increasingly with renewable energy that is supplied to the California grid from sources within, or directly proximate to, California. SB X1-2 mandates that renewables from these sources make up at least 50 percent of the total renewable energy for the 2011-2013 compliance period, at least 65 percent for the 2014–2016 compliance period, and at least 75 percent for 2016 and beyond. In October 2015, SB 350 was signed into law, which requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable resources by 2030. This legislation is expected to increase the renewable energy resources sold to retail customers over time, which will reduce GHG emissions associated with District-related electricity consumption over time.

South Coast Air Quality Management District

As described in Section 3.3, "Air Quality," the campus lies within the Basin, which is under the jurisdiction of SCAQMD. SCAQMD is primarily responsible for developing and implementing rules and regulations for attainment of the NAAQS and CAAQS, developing AQMPs, permitting new or modified sources, and adopting and enforcing air pollution regulations within the Basin. The ability of SCAQMD to control emissions (both criteria pollutants and GHGs) is provided primarily through permitting, but also through their role as a CEQA lead or commenting agency, the establishment of CEQA thresholds, and the development of analytical requirements for CEQA documents.

In the 2008 through 2010 timeframe, SCAQMD convened a series of GHG CEQA Significance Threshold Working Group sessions and developed draft thresholds for stationary sources and land use development projects. Following public review, SCAQMD formally adopted the 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) threshold for stationary/industrial facilities where SCAQMD is the lead agency (SCAQMD 2008, SCAQMD 2019). For land use development projects, SCAQMD proposes two different approaches to be taken by lead agencies when analyzing GHG emissions:

- Option #1 includes using separate numerical thresholds for residential projects (3,500 $MTCO_2e$/year), commercial projects (1,400 MTCO2e/year), and mixed-use projects (3,000 $MTCO_2e$/year).
- Option #2 includes use of a single numerical threshold for all nonindustrial projects of 3,000 $MTCO_2e$/year. (SCAQMD 2010).

SCAQMD noted in its draft thresholds' guidance that use of these thresholds was only a recommendation for lead agencies and not a mandatory requirement. While these land use development thresholds may be used at the discretion of the local lead agency, these thresholds have not been adopted by SCAQMD.

Southern California Association of Governments

Southern California Association of Governments (SCAG) is a regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties. SCAG is responsible for addressing issues related to transportation, the economy, community development, and the environment in the region. SCAG is the metropolitan planning organization (MPO) that is federally designated for most of the Southern California region. SCAG develops plans related to housing, transportation, growth management, hazardous waste management and air quality. SCAG's Regional Comprehensive Plan and Guide includes chapters related to Growth Management and Regional Mobility that support the land use and transportation components of the AQMP, which provide some GHG-reduction co-benefits. In 2020, SCAG adopted *Connect SoCal*, the area's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG was tasked by CARB to achieve an 8 percent per capita reduction compared to 2005 level emissions by 2020 and a 19 percent per capita reduction by 2035, which CARB confirmed the region would achieve by implementing its SCS (CARB 2020a).

Districtwide Green Building Polices and Sustainability Plan

The District has adopted various green building policies and its Sustainability Plan, which provides a strategic roadmap for meeting emission reduction goals in 2020, 2025, and 2030. These policies and the Sustainability Plan are summarized in Section 3.6, "Energy."

The District has not conducted a baseline GHG inventory or established growth forecasts or reduction targets. Once the inventory is conducted, the District will establish GHG reduction goals and programmatic targets for 2025 and 2030. Regardless, the Sustainability Plan includes various measures that reduce GHG emissions from all emission sectors.

3.8.2 Discussion

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 gases?

Less-than-significant Impact. With respect to GHG emissions, CEQA Guidelines section 15064.4 provides guidance to lead agencies for determining the significance of project impacts from GHG emissions. Section 15064.4(a) provides that a lead agency will make a good-faith effort based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Section 15064.4(a) further provides that a lead agency will have the discretion to determine, within the context of a particular project, whether to quantify GHG emissions from a project or rely on qualitative analysis or performance-based standards. Pursuant to the CEQA Guidelines in section 15064.4(a), the analysis presented herein quantifies GHG emissions resulting from the project, describes, calculates, and estimates those emissions. CEQA Guidelines section 15064.4(b) provides that when assessing the significance of impacts from GHG emissions, a lead agency should focus the analysis on the incremental contribution of the project's emissions to the effects of climate change and consider an appropriate timeframe for the project. The lead agency's analysis should reasonably reflect evolving scientific knowledge and state regulatory schemes and consider (1) the extent to which the project may increase or reduce GHG emissions compared with existing conditions, (2) whether the project's GHG emissions exceed a threshold of significance that the lead agency determines applies to the project, and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis of the potential impacts from the Proposed Project's GHG emissions follows this approach.

CEQA Guidelines do not provide numeric or quantitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of threshold significance up to the lead agency and authorize it to consider

thresholds of significance previously adopted or recommended by other public agencies or experts, provided that the lead agency's decision is supported by substantial evidence (CEQA Guidelines sections 15064.7[b] and 15064.7[c]). Additionally, any public agency may also use an environmental standard as a threshold of significance, as it would promote consistency in significance determination and integrate environmental review with other environmental program planning and regulations (CEQA Guidelines section 15064.7[d]).

The Proposed Project would be constructed in four phases over an approximately 7-year period, with activities anticipated to begin in June 2023 and end in December 2030. Although the exact timing for implementation of each phase is currently unknown, it was conservatively assumed that Phase 1 would occur in 2023 and 2024, Phase 2 in 2025, Phase 3 in 2026 and 2027, and Phase 4 in 2029 and 2030.

There are currently no adopted quantitative thresholds relevant to the Proposed Project. Neither the City of Santa Monica nor the District have drafted or adopted threshold approaches and guidelines for analyzing GHG emissions and climate change in CEQA documents. Additionally, although SCAQMD has adopted a 10,000 $MTCO_2e$ per year numerical bright-line significance threshold level for stationary/industrial projects where SCAQMD is the lead agency, this threshold would not be applicable to the Proposed Project because it is an educational land use project that does not fit into the industrial project category.

As noted above, SCAQMD has drafted separate numerical thresholds for residential projects (3,500 $MTCO_2e$/year), commercial projects (1,400 $MTCO_2e$/year), and mixed-use and all non-industrial projects (3,000 $MTCO_2e$/year). At its September 2010 meeting, SCAQMD staff recommended that the 3,000 $MTCO_2e$ numerical threshold be used for all non-industrial projects (SCAQMD 2010). This 3,000 $MTCO_2e$ level "captures" a substantial fraction of the emissions of future land use development that would be constructed to accommodate future statewide population and job growth but excludes small development projects that would contribute a relatively small fraction of cumulative statewide GHG emissions. SCAQMD has not adopted these land use development thresholds. Additionally, the Proposed Project is not a residential, commercial, or mixed-use project. However, while these thresholds have not been formally adopted and were not drafted specifically to evaluate emissions from school projects, comparison to these numerical thresholds – specifically, the 3,000 $MTCO_2e$ numerical threshold SCAQMD recommended for all non-industrial projects – can provide a valuable comparison to demonstrate that a project contributes a relatively small fraction of cumulative statewide GHG emissions.

Lastly, each of the numerical bright-line GHG threshold concepts are based on AB 32's requirement to reduce statewide GHG emissions to 1990 levels by 2020. Neither AB 32 nor SCAQMD's draft CEQA thresholds address reduction targets beyond 2020, which could include increasing the capture rate (upwards from the 90 percent capture rate for 2020) and must take into account the type and amount of land use projects and their expected emissions out to the next milestone year. While not legally binding on local jurisdictions, EO B-55-18 establishes a goal to achieve statewide carbon neutrality as soon as possible and no later than 2045, and EO S-03-05 has set forth a long-term reduction target to reduce GHG emissions by 80 percent below 1990 levels by 2050. Consequently, these draft numerical thresholds from SCAQMD are not applicable to the Proposed Project.

Note that GHG emissions are by their nature cumulative impacts because climate change is inherently a cumulative problem; there are no non-cumulative GHG emissions impacts from a climate change perspective (CAPCOA 2008). Therefore, in accordance with the scientific consensus regarding the cumulative nature of GHGs, the analysis herein analyzes the cumulative contribution of Proposed Project generated GHG emissions to climate change.

GHG emissions associated with the Proposed Project would be generated during both construction and operational activities. Construction and operational emissions are analyzed in the following sections. Note that the emissions presented in Tables 3.3-5 and 3.3-6 were estimated using preliminary site plans based on the Will Rogers Learning Community Campus Master Plan (September 1, 2020). Since then, refinements have been made to certain Proposed Project components, including some changes in square footages. These changes do not alter the conclusions presented in the analysis below.

Construction

The Proposed Project-related construction activities would result in GHG emissions from the use of heavy-duty off-road construction equipment, delivery trucks associated with materials transport, and vehicle use during worker commute. Construction activities are anticipated to occur in four phases, which would be built out from 2023 to 2030. Construction is anticipated to begin in mid-2023 and end in 2030. The anticipated construction timeframe for each phase is based on the estimated timeframes shown in Table 2-2 of Section 2, "Project Description." Data provided by the District and model defaults, where information was unavailable, were used to estimate the amount of activity and emissions associated with each phase.

Table 3.8-1 provides a summary of the estimated construction emissions that would occur over the life of the construction period.

Table 3.8-1 Proposed Project-Generated Construction Greenhouse Gas Emissions

Construction Phase	Total GHG Emissions ($MTCO_2e$)
Phase 1: Modernize Library	105
Phase 2: Construct New STEAM Building	99
Phase 3: Create 6th Grade Cohort & Modernize 8th Grade Courtyard	61
Phase 4: Renovate Central Quad & Renovate Cafeteria	67
Total Construction Emissions	**333**
Amortized Construction Emissions	**11**

Notes: Totals may not add due to rounding; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Modeled by Ascent Environmental in 2022.

Consistent with SCAQMD guidance, total construction emissions are summed and amortized over a 30-year project life and added to operational emissions, which are discussed below, to determine the significance of the Proposed Project's GHG emissions impacts. Because project-level GHG emissions are inherently cumulative, the construction emissions listed in Table 3.8-1 are considered as part of the GHG emissions for the Proposed Project lifecycle, including GHG emissions during operation.

Operations

Operation of the Proposed Project would result in area-source emissions from the operation of landscaping equipment, energy-source emissions from the consumption of electricity and natural gas in classroom buildings and the cafeteria, energy consumption associated with water use and the conveyance and treatment of wastewater, and solid waste-generated emissions from the transport and disposal of solid waste. Since the Proposed Project would not result in an increase in VMT, mobile sources would not contribute to the Proposed Project's GHG emissions. Modeling results are summarized in Table 3.8-2 with details provided in Appendix A.

Table 3.8-2 Proposed Project-Generated Operational Greenhouse Gas Emissions

Emissions Source	GHG Emissions ($MTCO_2e$/year)
Area	<1
Energy	249
Waste	32
Water and Wastewater	25
Construction GHG - Amortized	11
Total Operational GHG Emissions	**306**
Total Annual GHG Emissions	**317**

Notes: Totals may not add due to rounding; GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

Source: Modeled by Ascent Environmental in 2022.

As shown in Table 3.8-2, the Proposed Project is estimated to generate 317 $MTCO_2e$/year of GHG emissions. For context, this level of emissions is far below SCAQMD's 3,000 $MTCO_2e$ numerical threshold recommended for non-industrial projects.

The Scoping Plan is the State's roadmap to achieving long-term GHG reduction targets. The 2017 Scoping Plan lays out the framework for achieving the 2030 statewide GHG reduction target of reducing Statewide emissions to 40 percent below 1990 levels and achieve substantial progress toward achieving the State's 2050 goal of reducing emission to 80 percent below 1990 levels. The 2017 Scoping Plan integrates various CARB regulations and strategies, including Cap-and-Trade, LCFS, SB 350, Sustainable Freight Action Plan, Mobile Source Strategy, and the SLCP Strategy. Appendix B of the 2017 Scoping Plan includes detailed GHG reduction measures and local actions that land use development projects can implement to support the statewide goal. The draft 2022 Scoping Plan Update aims to assess progress towards achieving the SB 32 2030 target and lay out a path to achieve statewide carbon neutrality by no later than 2045. Appendix D of the draft 2022 Scoping Plan includes local action recommendations that align with the State's climate strategies. Scoping Plan recommendations are neither exhaustive nor binding. For CEQA analyses, both the 2017 and 2022 Scoping Plans recommend that projects should implement feasible mitigation, preferably measures that can be implemented on-site.

Additionally, the District's Sustainability Plan provides a strategic roadmap for formalizing the District's path towards GHG reductions. The Sustainability Plan is the most relevant local plan for reducing GHG emissions.

The discussion below summarizes the types of Proposed Project activities and sources that would generate GHG emissions and evaluates each for potential conflicts with the changes in these activities and sources that are needed to achieve the goals for GHG reductions in 2030 and beyond as identified in the adopted Scoping Plan and the District's Sustainability Plan.

Building and Cafeteria Energy Consumption

GHGs are emitted directly from buildings and cafeterias through the combustion of any type of fuel (e.g., natural gas for cooking). GHGs can also be emitted indirectly from the generation of electricity. The Scoping Plan outlines strategies to decarbonize buildings by replacing natural gas energy with zero-carbon electricity, expanding construction of zero-emission buildings, and increasing production and use of highly efficient and flexible, zero-emission appliances. For example, SB 100 requires a doubling of energy efficiency by 2030 and an RPS of 60 percent renewable by 2030. SB 100 also sets a target of 100 percent carbon-free electricity by 2045. The 2022 Title 24 standards mandate higher efficiency levels and rooftop solar photovoltaic systems for all new residential buildings constructed in 2020 and beyond. Future standards are expected to result in zero net energy for newly constructed commercial buildings. The CEC also enforces the Appliance Efficiency Regulations contained in Title 20 of the California Code of Regulations. The regulations establish water and energy efficiency standards for both federally regulated and non-federally regulated appliances.

OPR recommends that a land use development project that "achieves applicable building energy efficiency standards, uses no natural gas or other fossil fuels, and includes Energy Star appliances where available, may be able to demonstrate a less-than-significant greenhouse gas impact associated with project operation" (OPR 2018). Over time, CARB and other state agencies are likely to be directed to adopt zero-emission building standards for new construction through Title 24 or other means.

Although the Proposed Project would comply with mandatory building energy efficiency standards, it would use natural gas and electricity sources generated at least partially from fossil fuels. The District intends to install solar panels to reduce the reliance on the fossil fuels. However, if solar panels are not feasible, the District would opt to receive a higher tier of sustainable energy supplies to the school to ensure a similar reduction in the use of fossil fuels. As time goes on, the electricity grid would also become cleaner, and coupled with the energy efficiency measures implemented by the District through its green building policies and Sustainability Plan, will reduce GHG emissions from energy consumption over time.

Energy use from the new and renovated buildings, parking lots, and cafeteria would be minimal, amounting to 249 $MTCO_2e$ per year. The emissions estimate herein is based on the anticipated emission rate for SCE in 2025, 2026,

2028, and 2031. Per SB 100, SCE will be required to achieve 100 percent carbon-free electricity by 2045. Thus, while the estimate herein is based on the anticipated 2026 emissions rate, emissions from electricity will trend to zero over time. While fossil fuel consumption is expected to be low, and trend down as the electric portfolio becomes more renewable, there is some reliance on fossil fuels.

Mobile Sources

Since the Proposed Project would not increase the capacity of the school campus, there would not be any increase in the current VMT generated by the school. Therefore, there would not be any operational GHG emissions from mobile sources.

Water Use and Wastewater Generation

As shown in Table 3.8-2, emissions associated with water use and wastewater generation are estimated to be 25 $MTCO_2e$ per year. However, the District has identified water efficiency as a priority for the school buildings and cafeteria, and the District would aim to reduce the indoor water usage to the extent possible. To achieve this reduction, the new phases to be built under the Proposed Project would include installation of faucet aerators and showerheads with high-efficiency alternative, replace the domestic plumbing fixtures with high-efficiency fixtures including 0.125 gallon per flush (GPF) models for urinals, 0.8 GPF models for tank toilets, and 1.26 GPF models for flush valve toilets. With respect to outdoor water use, drought tolerant vegetation and native plants would be used in open spaces. Bioswale planters, permeable pavement, and subsurface infiltration systems would be installed to capture and treat stormwater runoff from the campus. These features would reduce outdoor water use for irrigation.

Waste Generation

As shown in Table 3.8-2, emissions associated with waste would total approximately 32 $MTCO_2e$ per year. California has specific goals for diverting organic waste, which decomposes in landfills to produce the super pollutant methane. State law also directs edible food go to hungry families rather than being discarded. Additionally, the Scoping Plan mentions that while reducing organic waste disposal is the most effective means of achieving reductions in the waste sector, additional strategies to reduce emissions from waste once it is disposed of at the landfill will also play a role in achieving emission reductions. Emissions estimates are based on default waste disposal rates, overall waste composition from CalRecycle, and statewide gas capture, which are embedded in CalEEMod.

Area Sources

As shown in Table 3.8-2, emissions associated with area sources, which include gasoline-powered landscaping equipment (e.g., trimmers, mowers), would total less than 1 $MTCO_2e$ per year at full buildout. Given that the landscape improvements would feature low-maintenance plants that require minimal care, the use of trimmers and mowers is also anticipated to be minimal. Additionally, the state is in the process of adopting a regulation focused on transitioning to zero emission small off-road engines, which includes lawn and gardening equipment along with small portable generators and pressure washers. While these regulations are not yet adopted, additional regulations aimed at small gasoline engines are likely over the next few years.

Summary

The GHG emissions from the Proposed Project would be far below SCAQMD's 3,000 $MTCO_2e$ numerical threshold recommended for non-industrial projects and the adoption of sustainable design features by the school would further reduce emissions over the life of the Proposed Project. In addition, the electricity grid would get cleaner over time in order to achieve SCE's 100 percent carbon-free electricity goal by 2045. Thus, 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 amount of GHG emissions generated by construction and operation of the Proposed Project would not have a significant effect on the environment. This impact would be less than significant, and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts related to GHG emissions and no mitigation measures are required.

3.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials.				
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or 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 or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
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?	☐	☐	☐	☒
h) Be located on a site that is, (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?	☐	☐	☐	☒

i)	Be located within one-fourth mile of any facilities, which be reasonably anticipated to emit hazardous or acutely hazardous materials, substances or waste?	☐	☐	☒	☐
j)	Be located on a site where the property line is less than the following distances from the edge of the respective power line easements: (i) 100 feet of a 50-133kV line, or (ii) 150 feet of a 220-230 kV line, or (iii) 350 feet of a 500-550 kV line?	☐	☐	☐	☒
k)	Be located on a site that is within 1,500 feet of a railroad track easement?	☐	☐	☐	☒
l)	Be located on a stie that is near a reservoir, water storage tanks or high-pressure water lines?	☐	☐	☐	☒
m)	Be located within 1,500 feet of a pipeline that may pose a safety hazard?	☐	☐	☐	☒
n)	Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	☐	☐	☐	☒
o)	Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play field that can be safety supervised?	☐	☐	☐	☒
p)	Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	☐	☐	☐	☒
q)	Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	☐	☒	☐	☐
r)	Create unsafe routes to schools for students walking local neighborhoods?	☐	☒	☐	☐
s)	Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?	☐	☐	☐	☒

3.9.1 Environmental Setting

SITE CONDITIONS

Alta Environmental DBA NV5 (NV5) prepared a Phase I Environmental Site Assessment (ESA) in April 2022 to identify recognized environmental conditions (REC) in connection with the campus. The Phase I ESA is provided as Appendix C. The American Society of Testing and Materials defines a REC as the presence or likely presence of any hazardous substances or petroleum products in, at, or on a property due to any release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment. Based on the Phase I ESA, no evidence of RECs, controlled RECs, or historic RECs were identified in connection with the campus. However, based on the age of past and current structures on the campus, there is potential for arsenic, lead from lead-based paint, asbestos, pesticides, and polychlorinated biphenyls (PCBs) to be present in shallow soils on the site (NV5 2022).

The campus was previously listed on the following regulatory databases due to inorganic solid waste, asbestos-containing waste, and organic solids:

- Resource Conservation and Recovery Act (RCRA) Non-Generators/No Longer Regulated;
- U.S. EPA Enforcement and Compliance History Online (ECHO) and Facility Index System (FINDS); and
- Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System (HWTS), HAZNET Facility and Manifest Data.

The Phase I ESA also identified multiple regulatory database listings at adjoining properties, which include the following:

- John Adams Middle School, located across 16th Street from the campus, was listed due to lead concentrations that exceeded screening levels during an assessment completed in 2018. In August 2019, lead contaminated soils were excavated and disposed of offsite. A No Further Action letter was issued by DTSC for the property on September 25, 2019. Additionally, PCB containing materials were removed from the property in 1994 and 1995.

EMERGENCY PLANS

The City of Santa Monica Office of Emergency Management has adopted a Multi-Hazard Functional Emergency Plan, which is intended to address a wide range of natural and manmade emergencies and disasters (City of Santa Monica 2013). The District and Santa Monica College adopted an All-Hazard Mitigation Plan, which includes strategies and recommendations to reduce risks associated with the identified hazards (District 2017). In addition, the District adopted a Comprehensive School Safety Plan for all campuses, including the Will Rogers campus, that addresses specific procedures to follow in the event of various types of emergencies (District 2018).

AIRPORT HAZARDS

The Santa Monica Municipal Airport is located at 3223 Donald Douglas Loop South, approximately 0.5 mile southeast of the campus. This airport is governed by the Santa Monica Airport Code and the Los Angeles Regional Planning Commission/Airport Land Use Commission's Airport Land Use Compatibility (ALUC) guidelines. This document provides for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations. Normal airport operations that comply with applicable regulations would not pose a safety hazard to the surrounding areas, including the campus.

The campus is not within the boundaries of the Airport Influence Area for the Santa Monica Municipal Airport, which is defined as the area where current or future airport-related noise, over flight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses (Los Angeles County ALUC 2003).

WILDLAND FIRE RISK

According to the California Department of Forestry and Fire Protection (CAL FIRE), the City of Santa Monica, including the campus, is within a local responsibility area designated as a non-very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2011).

3.9.2 Discussion

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. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the Proposed Project. These materials are not considered acutely hazardous and are used routinely throughout urban environments for similar types of construction projects. Furthermore, these materials would be handled, transported, used, and disposed of in

accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Applicable regulations include, but are not limited to, the following: the Federal Resource Conservation and Recovery Act (RCRA), which includes requirements for hazardous solid waste management; the Department of Toxic Substances Control Environmental Health Standards for the Management of Hazardous Waste (CCR Title 22, Division 4.5), which include standards for generators and transporters of hazardous waste; South Coast Air Quality Management District (SCAQMD) Rules governing work practice requirements for renovation and demolition activities; and California Division of Occupational Health and Safety (CalOSHA), which includes standards for workplace health and safety. Use of these materials for their intended purpose during construction would not pose a significant risk to the public or environment.

During operations, hazardous materials that could be used for maintenance of campus facilities and landscaped areas include chemical reagents, solvents, fuels, paints, cleansers, pesticides, and fertilizers. These materials would be similar to those currently used at the campus and throughout the Will Rogers campus. The management, use, storage, and transportation of such hazardous materials is subject to local, state, and federal laws. Additionally, Will Rogers has a School Safety Plan that outlines procedures to address evacuation, clean up, and communication protocols to protect students and staff in the event of a hazardous materials spill (District 2018).

Adherence to federal, state, and local regulations and implementation of the School Safety Plan would minimize risks associated with the routine transport, use, and disposal of hazardous materials. Therefore, impacts would be less than significant, and no mitigation is required.

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

Less than Significant with Mitigation Incorporated. As described above in Section 3.9.2(a), construction activities may involve the use of hazardous materials, including gasoline, diesel fuel, lubricating oil, grease, solvents, and other chemicals. These materials are not considered acutely hazardous and are used routinely throughout urban environments for similar types of construction projects. Use of hazardous materials during construction activities would be subject to compliance with applicable federal, state, and local statutes and regulations pertaining to hazardous materials. Compliance with these regulations would reduce the potential for hazardous materials to be released to the environment during construction. In addition, the District and its contractor would be required to implement a Storm Water Pollution Prevention Plan during construction activities, which would include best management practices (BMPs) to help prevent any contaminated runoff from leaving the campus.

As discussed in Section 3.9.1, a Phase I ESA was completed for the campus. Based on the age of past and current onsite structures that are proposed for renovation and demolition, hazardous materials such as arsenic, lead-based paint, asbestos, pesticides, and PCBs may be present in buildings and in the shallow soils on the campus. The removal of building materials and disturbance of contaminated soils may result in the release of hazardous materials into the environment. Exposure of construction workers or members of the public to these substances could result from direct contact with the substance during demolition and/or grading activities, incidental ingestion of the substance, and/or inhalation of airborne dust released from dried hazardous materials. The potential for the Proposed Project's construction to release hazardous building materials and contaminated soil into the environment would be a potentially significant impact. However, mitigation measures **MM-HAZ-1** and **MM-HAZ-2** would be implemented prior to and during construction to ensure that hazardous materials are properly identified, removed, and disposed in a manner that minimizes the potential for significant hazards to the public or to the environment to the extent feasible.

During the Proposed Project's operations, hazardous materials that could be used for maintenance of campus facilities and landscaped areas include chemical reagents, solvents, fuels, paints, cleansers, pesticides, and fertilizers. These materials would be similar to those currently used throughout the Will Rogers campus. The management, use, storage, and transportation of such hazardous materials is subject to local, state, and federal laws. Additionally, Will Rogers has a School Safety Plan that outlines procedures to address evacuation, clean up, and communication protocols to protect students and staff in the event of a hazardous materials spill (District 2018).

Adherence to federal, state, and local regulations and implementation of the School Safety Plan in the event of a hazardous materials spill at the campus would minimize risks associated with accidental releases of hazardous materials into the environment during The Proposed Project's operations. In addition, implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2 would reduce construction-related impacts to less than significant.

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 with Mitigation Incorporated. The campus is an existing school campus. In addition, John Adams Middle School is approximately 100 feet east of the campus and Santa Monica College is approximately 430 feet north of the campus. No other schools are within one-quarter mile of the campus.

As described above in Sections 3.9.2(a) and (b), the Proposed Project's construction activities may involve the use of hazardous materials, such as fuels, oils, mechanical fluids, and other chemicals. These materials are not considered acutely hazardous and would be used in limited quantities. In addition, the transportation, storage, use, and disposal of such hazardous materials during construction activities would be conducted in accordance with applicable federal, state, and local statutes and regulations.

Demolition and renovation of existing buildings and earth-moving activities at the campus could result in the release of hazardous building materials and soil contaminants such as arsenic, lead-based paint, asbestos, pesticides, and PCBs. Release of these hazardous materials may create a hazard for the public, with the potential to affect students, staff, and visitors at Will Rogers and nearby schools within one-quarter mile of the campus. However, compliance with regulatory requirements and implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2 would ensure that such materials would be properly removed, handled, and disposed of. These measures would minimize the potential for the release of hazardous building materials and soil contaminants during construction activities and would ensure that students, faculty, and visitors at Will Rogers and nearby schools within one-quarter mile of the campus are not exposed to hazardous material releases.

During operations, hazardous materials that could be used for maintenance of campus facilities and landscaped areas include chemical reagents, solvents, fuels, paints, cleansers, pesticides, and fertilizers. These materials would be similar to those currently used at the campus and throughout the Will Rogers campus. As such, the minor and limited use of hazardous materials on the campus during operations would not be expected to adversely affect students, faculty, and visitors at Will Rogers and nearby schools within one-quarter mile of the campus.

Adherence to federal, state, and local regulations would minimize risks associated with hazardous emissions in proximity to schools. In addition, implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2 would reduce construction-related impacts to less than significant. No additional mitigation is required

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

Less than Significant with Mitigation Incorporated. As described in Section 3.9.1, the campus is listed on the RCRA Non-Generators/No Longer Regulated, ECHO, FINDS, and HWTS HAZNET databases. However, no violations were identified on the ECHO or FINDS databases. According to the two HWTS HAZNET database listings, the Will Rogers campus disposed of asbestos-containing waste in 1994, inorganic solid waste in 2017 and 2018, and organic solids in 2009. The RCRA Non-Generators/No Longer Regulated database listings show that the school is not listed as a handler of nonhazardous or hazardous waste. Based on the database results, neither a release of hazardous materials nor the presence of a naturally occurring hazardous material that would pose a threat to public health or the environment is anticipated.

As discussed above in Section 3.9.2(b) and (c), earth-moving activities at the campus could result in the release of soil contaminants, such as arsenic, lead-based paint, asbestos, pesticides, and PCBs. Release of these hazardous materials may create a hazard to the public or the environment. However, compliance with regulatory requirements and implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2 would ensure that such materials would be

properly removed, handled, and disposed of. These measures would minimize the potential for the Proposed Project to create a significant hazard to the public or to the environment from hazardous materials.

Therefore, the Proposed Project would not create a significant hazard to the public or the environment from being located on a hazardous materials site compiled pursuant to Government Code section 65962.5. Impacts would be less than significant, and no mitigation is required.

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

No Impact. As discussed in section 3.9.1, the Proposed Project is located approximately 0.6 mile west of the Santa Monica Municipal Airport. The campus is not within the boundaries of the Airport Influence Area for this airport and is therefore not subject to the airport's land use restrictions. Additionally, the Proposed Project would not change the existing land use designation for the campus.

Federal Aviation Regulations Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Under this regulation, any project proponent that intends to perform construction or alterations to structures that exceed 200 feet in height above ground level must notify the Federal Aviation Administration prior to construction. The Proposed Project would not involve the construction of new structures or renovation of existing structures that exceed 200 feet. Therefore, the Proposed Project would not result in safety hazards from interference with aircraft.

Based on California's Airport Noise Standards, the standard for the acceptable level of aircraft noise for persons living in the vicinity of airports is hereby established to be a community noise equivalent level of 65 decibels. According to the 2020 Community Noise Equivalent Level (CNEL) Noise Contours, the campus is not within the 65 dB CNEL noise contour for the Santa Monica Municipal Airport (City of Santa Monica 2021a).

Therefore, the Proposed Project would have no impact related to airport safety hazards and excessive noise and no mitigation is required.

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

No Impact. The Proposed Project would involve renovation and modernization of the Will Rogers campus. These improvements would not increase enrollment and would not introduce new uses to the campus that do not currently exist. If necessary, the District would review and revise the existing School Safety Plan to reflect the new facilities at the campus and to revise any evacuation procedures or routes. In addition, the City of Santa Monica Fire Department would review the Proposed Project's plans to ensure that the new facilities comply with the requirements of the Santa Monica Fire Code and to ensure that adequate emergency access is provided. The Proposed Project's plans would be revised in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. Furthermore, the Proposed Project would provide additional points of ingress/egress at the campus. Specifically, a portion of the existing parking lot along 14th Street in the northwest portion of the campus would be reconfigured and expanded in Phase 2. The parking lot would connect 14th Street and 16th Street, with vehicle entrances and exits at each street and a vehicle turnaround in the center. This connection would provide additional emergency access to the school compared to existing conditions. Therefore, the Proposed Project would not impair or interfere with emergency response and evacuation plans, including the City's Multi-Hazard Plan, the District and Santa Monica College's All-Hazard Mitigation Plan (District 2017), and the District's Comprehensive School Safety Plan for the Will Rogers campus (District 2018). No impact would occur, and no mitigation is required.

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

No Impact. As described in Section 3.9.1, the City of Santa Monica, including the campus, is in a developed, urban area that is designated by CAL FIRE as a non-VHFHSZ. There are no wildland areas within or in proximity to the

campus. Therefore, the Proposed Project would not directly or indirectly expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur, and no mitigation is required.

h) Be located on a site that is, (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?

No Impact. According to the Phase I ESA, the campus is not the location of a current or former hazardous waste disposal site, solid waste disposal site, or hazardous substance release site. Additionally, no pipelines carrying hazardous materials or wastes were identified on or adjoining the campus (NV5 2022). Therefore, there would be no impact related to hazardous waste or solid waste disposal sites or pipelines carrying hazardous materials or waste and no mitigation is required.

i) Be located within one-fourth mile of any facilities, which be reasonably anticipated to emit hazardous or acutely hazardous materials, substances or waste?

Less than Significant Impact. As described in the Phase I ESA, a Grid Search Request was submitted to SCAQMD to identify all permitted facilities with the potential to emit hazards air pollutants within one-quarter mile of the campus. The SCAQMD identified two permitted facilities within one-quarter mile of the campus, both of which have permits to operate diesel-fired emergency backup electrical generators. Aside from monthly testing, these backup electrical generators would only be used in times of emergency, and therefore would not be a regular source of emissions. Additionally, the Proposed Project would not increase the student capacity of the school. Therefore, impacts from being within one-fourth mile of facilities that may emit hazardous or acutely hazardous materials, substances, or waste would be less than significant and no mitigation is required.

j) Be located on a site where the property line is less than the following distances from the edge of the respective power line easements:

(i) 100 feet of a 50-133kV line, or

(ii) 150 feet of a 220-230 kV line, or

(iii) 350 feet of a 500-550 kV line?

No Impact. As discussed in Section 3.9.1, no power line easements were identified within 350 feet of the campus (NV5 2022). Therefore, there would be no impact related to power lines and no mitigation is required.

k) Be located on a site that is within 1,500 feet of a railroad track easement?

No Impact. As discussed in Section 3.9.1, no railroad track easements were identified within 1,500 feet of the campus (NV5 2022). Therefore, there would be no impact related to railroads and no mitigation is required.

l) Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?

No Impact. According to the Phase I ESA, the campus is not within a dam breach inundation boundary nor is it in proximity to aboveground water storage tanks or high-pressure water lines (NV5). As such, the Proposed Project would not create or exacerbate safety risks to students from nearby reservoirs, water storage tanks, or high-pressure water lines. Therefore, there would be no impact related to reservoirs, water storage tanks or high-pressure water lines, and no mitigation is required.

m) Be located within 1,500 feet of a pipeline that may pose a safety hazard?

No Impact. As discussed in Section 3.9.2(h), the campus is not located within 1,500 feet of an above or below ground pipeline easement (NV5 2022). Therefore, there would be no impact related to pipeline safety hazards and no mitigation is required.

n) Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?

No Impact. According to the Phase I ESA, the campus is not in proximity to any aboveground fuel storage tanks (NV5 2022). As such, the Proposed Project would not create or exacerbate safety risks to students from nearby propane tanks. Therefore, there would be no impact related to propane tanks and no mitigation is required.

o) Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play field that can be safely supervised?

No Impact. The California Department of Education standards for school site selection require that school sites have a proportionate length-to-width ratio to accommodate building layout, parking, and playfields to ensure that students can be safely supervised. The campus is developed with an existing elementary school consisting of portable and permanent classroom buildings, parking lots, and play fields. The Proposed Project would not result in changes to the overall footprint of the school and the layouts of buildings on the campus would generally be maintained. However, the Proposed Project would reconfigure some aspects of the campus. Specifically, the Proposed Project would relocate the existing play fields from their current location along the northern portion of the campus to the center of the campus. Additionally, the Proposed Project includes the construction of new kindergarten and elementary classroom buildings in the former location of the play fields. Further, the Proposed Project includes the construction of new parking lots and modifications to existing parking lots on the campus. While the Proposed Project would result in the partial reconfiguration of the campus, all proposed improvements would be designed in accordance with California Department of Education guidelines and would not interfere with safe supervision. Therefore, the Proposed Project would have no impact related to safety supervision and no mitigation is required.

p) Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?

No Impact. According to the Phase I ESA, no hazardous waste or solid waste disposal sites are located within 2,000 feet of the campus (NV5 2022). Therefore, the Proposed Project would not be located on a site that is within 2,000 feet of a significant disposal of hazardous waste. There would be no impact related to hazardous waste disposal sites and no mitigation is required.

q) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

r) Create unsafe routes to schools for students walking local neighborhoods?

Less than Significant with Mitigation Incorporated. The Proposed Project's improvements would generally be contained within the Will Rogers campus. The Proposed Project includes the construction of a new parking lot in the northern portion of the campus that would provide an internal drop-off and pick-up area for students. The relocation of student drop-off and pick-up from its current location on 14th Street to an internal location on the campus would improve student safety compared to existing conditions. The Proposed Project would be consistent with all City design and safety standards including those set forth in the City's Municipal Code. Article 7 of the City's Municipal Code pertains to public works. Specifically, Section Chapter 7.04 establishes the standards required for street improvements, including Section 7.04.180 which address driveways from public streets into private property. Further, Section 7.06.340 addresses construction requirements including vehicle and pedestrian crossing safety. Municipal Code Chapter 9.28 details the standards for parking, loading, and circulation including access and dimension requirements. Pedestrian and bicyclist safety and circulation is also addressed in this section of the Municipal Code to ensure sight distances, sidewalk width requirements, and other access standards are met.

However, to accommodate the proposed new parking lot, a new driveway would be installed along 16th Street. An existing crosswalk is located directly adjacent to where the driveway is proposed that provides pedestrian access across 16th Street to the sidewalk in front of John Adams Middle School. As such, the location of the proposed new driveway would conflict with the existing pedestrian right-of-way, resulting in a potential safety hazard and potentially significant impact.

Mitigation measure **MM-HAZ-3** would require the District to coordinate with the City to relocate the existing crosswalk on 16th Street located near the campus' northeastern boundary. The implementation of mitigation measure **MM-HAZ-3** would ensure that all permits are obtained and design standards are met to minimize safety hazards for people utilizing the new crosswalk. Alternatively, the District may redesign the Proposed Project such that the proposed new driveway does not conflict with the existing crosswalk on 16th Street. For these reasons, with the implementation of mitigation measure **MM-HAZ-3**, the Proposed Project would not substantially increase vehicular and/or pedestrian safety hazards or result in unsafe routes for students walking to the school. Impacts would be less than significant with mitigation incorporated.

s) Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?

No Impact. As discussed in Section 3.9.1, the campus is not adjacent to or near a major arterial roadway or freeway. Therefore, the Proposed Project would have no impact with regard to safety hazards from major arterial roadways or freeways and no mitigation is required.

Mitigation Measures

The following mitigation measures would be implemented to reduce impacts related to hazards and hazardous materials:

MM-HAZ-1: Hazardous Building Materials

Prior to demolition and/or renovation activities, the existing buildings proposed for demolition and/or renovation will be inspected by a qualified environmental specialist for the presence of hazardous building materials, including arsenic, asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCB), and organochlorine pesticides (OCP). If hazardous building materials are detected, abatement and removal of these materials will be conducted in accordance with applicable federal, state, and local guidelines as follows:

- In the event that ACM and LBP are found on the campus, notice will be provided to the South Coast Air Quality Management District (SCAQMD), and any demolition activities likely to disturb ACM and LBP will be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work in conformance with SCAQMD, the California Division of Occupational Health and Safety (CalOSHA), the California Department of Toxic Substances Control (DTSC), and other applicable requirements. If found, ACM and LBP will be disposed of at an appropriately permitted facility.
- If PCBs are found on the campus, these materials will be managed in accordance with the Metallic Discards Act of 1991 (California Public Resources Code, Sections 42160-42185) and other state and federal guidelines and regulations. Demolition plans and contract specifications will incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly Section 42175, Materials Requiring Special Handling, for the removal of PCB-containing materials.
- If OCPs are found on the campus, these materials will be managed and disposed of in accordance with applicable regulations, including the Resource Conservation and Recovery Act.
- 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 DTSC requirements before commencing with demolition activities.

MM-HAZ-2: Limited Phase II Environmental Site Assessment and Contaminated Soils Work Plan

As recommended in the Phase I Environmental Site Assessment (ESA) prepared for the Proposed Project, the District will retain a licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with more than 2 years of experience conducting hazardous material and contamination assessments to conduct a limited Phase II ESA subsurface investigation. The Phase II ESA subsurface investigation will be conducted prior to any disturbance of the area(s) suspected of potential contamination to evaluate shallow soil conditions with respect to the chemicals of concern for the campus, as indicated by the Phase I ESA. If the Phase II ESA identifies the presence of

contaminated media, the contractor shall prepare and implement a Contaminated Soils Work Plan (Work Plan) for the removal of arsenic, asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyls (PCB), and/or organochlorine pesticides (OCP) residues from the on-site soils. The contractor will prepare and submit the Work Plan to the District for approval prior to commencing ground-disturbing construction activities in areas of contamination identified by the Phase II ESA. Affected soils will be excavated and disposed of off-campus at a landfill permitted to accept such waste, and the campus would be cleaned to an acceptable level per California Department of Toxic Substances Control (DTSC) requirements.

After the District confirms that the affected soils have been removed, through the collection of soil samples in the excavation areas, the excavation will be backfilled and compacted with clean soil, and a Completion Report will be prepared documenting the removal and present analytical result for the confirmation samples.

MM-HAZ-3: Relocate the Existing Crosswalk on 16th Street

The District will coordinate with the City of Santa Monica Public Works Department and Department of Transportation to obtain the applicable permits and perform any safety analysis required to relocate the existing crosswalk on 16th Street adjacent to the location of the proposed new parking lot and driveway. The new crosswalk shall be designed in accordance with City standards and provide a high visibility crossing for pedestrians including students, staff, and visitors accessing the Will Rogers Learning Community and John Adams Middle School campuses. Plans for the new crosswalk shall be subject to review and approval by the City of Santa Monica to ensure safety standards and regulations are met during construction and operation. Alternatively, the District may redesign the Proposed Project such that the proposed new driveway does not conflict with the existing crosswalk on 16th Street. Should the District relocate the proposed new driveway, the District will submit the plans for the new driveway location to the City of Santa Monica for review and approval.

3.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality.				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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 on- or offsite erosion or siltation;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
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?	☐	☐	☒	☐

3.10.1 Environmental Setting

SURFACE WATER

The campus is in the Pico-Kenter subwatershed within the Santa Monica Bay Watershed Management Area. The Pico-Kenter subwatershed encompasses an area of 4,147 acres that drains into the Santa Monica Bay. This subwatershed is predominately urbanized, consisting of 69 percent residential, 6 percent commercial, 3 percent public, and 19 percent open space land uses (LARWQCB 2011). The Santa Monica Bay, which is located 1.3 miles southwest of the campus, is listed as an impaired water body on the 2018 303(d) List for the following pollutants: arsenic, dichlorodiphenyltrichloroethane (DDT), mercury, polychlorinated biphenyls (PCB), and trash (LARWQCB 2018).

STORMWATER DRAINAGE

Stormwater runoff from the campus drains into the municipal storm drain system through a series of catch basins. The runoff is then carried through underground pipes within 16th Street that range in diameter from 33 to 36 inches in the vicinity of the campus (City of Santa Monica 2013). Stormwater runoff is either treated through catch basin inserts or diverted to the Santa Monica Urban Runoff Recycling Facility before ultimately draining into the Santa Monica Bay (City of Santa Monica 2006).

GROUNDWATER

According to the Phase I ESA, groundwater data for an ongoing groundwater investigation approximately 0.5 miles southwest of the campus indicates that the shallowest groundwater in the Proposed Project's vicinity is approximately 56 to 81 feet bgs and flows towards the south (NV5 2022).

WATER SUPPLIES

The City of Santa Monica's water supply primarily comes from local groundwater that is pumped and treated at the City's Arcadia Water Treatment Plant. Imported water from the Metropolitan Water District of Southern California (MWD) is also used to supplement local supplies (City of Santa Monica 2019). From 2016 to 2020, approximately 64 percent of the water supply came from groundwater, 35 percent was imported from MWD, and one percent consisted of recycled water sources (City of Santa Monica 2021).

FLOOD RISK

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), the campus is designated Zone X, which indicates areas of minimal flood hazard (FEMA 2021). The campus is not within a tsunami hazard area (CGS 2009) and is not in proximity to an enclosed body of water that is susceptible to seiche.

3.10.2 Discussion

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

Less-than-significant Impact. Construction activities could potentially violate applicable water quality standards by introducing pollutants to stormwater runoff. There are two primary ways that construction activities could adversely affect water quality: ground disturbance and pollutant spills or leaks. Ground disturbance such as vegetation removal, compaction, grading, and temporary soil stockpiling could potentially increase sediment levels in stormwater runoff by eroding soils that have been loosened or newly exposed by construction activity. Materials that could spill or leak during construction include diesel fuel, gasoline, lubrication oil, cement slurry, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, and construction-related trash and debris. The use of these materials would be limited to the minimum necessary to fuel vehicles, power equipment, and complete activities. Improper management of hazardous materials could result in accidental spills or leaks, which could locally contaminate stormwater runoff.

The Proposed Project would involve a total of 5.34 acres of ground disturbance, with Phases 1 and 2 resulting in greater than one acre of ground disturbance. Potential water quality impacts associated with construction would be temporary and highly localized. However, because the Proposed Project, as a whole, would involve more than one acre of ground disturbance, the District and/or its contractor would be required to submit a Notice of Intent to the State Water Resources Control Board (SWRCB) in order to obtain approval to carry out construction activities under the NPDES Construction General Permit. This permit includes a number of design, management, and monitoring requirements to protect water quality and reduce impacts related to stormwater (and some non-stormwater) discharges during construction. Compliance with the Construction General Permit requires that a SWPPP be developed, which would identify stormwater collection and discharge points and outline BMPs for preventing water

quality degradation. At a minimum, BMPs would include erosion controls (e.g., mulches, soil binders, erosion control blankets/mats, outlet projection/energy dissipation devices), sediment controls (e.g., silt fences, fiber rolls, gravel bags), tracking controls (e.g., stabilized construction entrance/exit, entrance/outlet tire wash), wind erosion controls, non-stormwater management, and materials and water management (cleanup and containment of trash and debris, stockpile management, spill prevention and control, hazardous waste management). Implementation of the BMPs included in the SWPPP would protect water quality by reducing construction-induced erosion and sedimentation at the campus and by reducing the amount of sediment and other potential water pollutants that leave the site. The SWPPP would also include hazardous materials BMPs necessary to prevent or contain any spills or leaks that may be associated with construction equipment and materials.

Although construction activities have the potential to adversely affect water quality, required coverage under the statewide Construction General Permit would ensure that potential construction-related impacts on water quality are avoided or substantially minimized. Coverage under the statewide Construction General Permit would also ensure that the Proposed Project would not violate any SWRCB or RWQCB standards or waste discharge requirements. For these reasons, construction impacts on stormwater quality would be less than significant and no mitigation is required.

Implementation of the Proposed Project would not change the existing land use of the campus. The Proposed Project would not introduce new point sources of pollutants or discharges, such as industrial facilities. Therefore, implementation of the Proposed Project would not violate any water quality standards or waste discharge requirements related to non-stormwater discharges.

The campus is primarily covered with impervious surfaces and would continue to be primarily impervious after project implementation. Phases 1 and 4 would result in a net decrease in impervious surface area by approximately 0.43 acre and 0.33 acre, respectively, while Phases 2 and 3 would each result in a net increase of 0.06 acre of impervious surfaces. As such, the Proposed Project would result in a total net decrease in impervious surface area by 0.64 acre, thereby decreasing the amount of future stormwater discharge from the campus compared to existing conditions. Furthermore, bioswale planters, permeable pavement, and subsurface infiltration systems would be installed on the campus to capture and filter stormwater runoff from the campus.

The District would be required to obtain permits for connections to the municipal storm drain and sanitary sewer systems and would adhere to effluent limitations contained therein. No separate NPDES permit or waste discharge requirements would be necessary for Proposed Project operations. Because the Proposed Project would not increase the volume or decrease the quality of stormwater runoff flowing from the campus into the City's storm drain system, operational impacts on stormwater quality would be less than significant and no mitigation is required.

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. As described in Section 3.10.1, the depth to groundwater at the nearest groundwater well to the campus was recorded at 56 feet bgs at its shallowest point. Excavation required for Proposed Project construction would extend to a maximum depth of approximately 5 feet bgs. Therefore, it is unlikely that groundwater would be encountered during construction and dewatering would not be required. Construction activities would result in a temporary increase in water consumption for cleaning surfaces, mixing with concrete or other materials, suppressing dust, and establishing plants. The relatively minor water supply needed for proposed construction activities would not consume a substantial amount of water supplies. Therefore, construction activities would not result in a substantial decrease in groundwater supplies.

Once operational, the Proposed Project would not result in an increase in student enrollment or faculty at the Will Rogers campus. Therefore, the Proposed Project would not increase demands for water usage at the campus compared to existing conditions. In addition, the Proposed Project would be designed to meet the water conservation requirements of the most current Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Energy Code). The Proposed Project would also incorporate design considerations to improve water efficiency to help meet or exceed the District's Collaborative for High Performance Schools (CHPS) minimum criteria by 25 percent. High efficiency plumbing fixtures would be installed in the new and renovated facilities. Furthermore,

landscaping would consist of drought-tolerant and native plants that minimize water use. Therefore, operation of the Proposed Project would not result in a substantial decrease in groundwater supplies.

Under existing conditions, the campus is primarily impervious and, therefore, does not provide for substantial groundwater recharge. The Proposed Project would result in a total net decrease in impervious surface area of 0.64 acre and the campus would remain primarily impervious. Bioswale planters, permeable pavement, and subsurface infiltration systems would be installed on the campus to capture and infiltrate stormwater runoff from the campus. Therefore, the Proposed Project would not substantially interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. Impacts related to groundwater use and groundwater recharge would be less than significant and no mitigation is required.

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 on- or offsite erosion or siltation;

Less-than-significant Impact. During construction of the Proposed Project, drainage patterns on the campus may be temporarily altered due to grading activities. As discussed in Section 3.10.2(a), the Proposed Project would be required to comply with the conditions of the Construction General Permit issued by the SWRCB. A SWPPP would be prepared and implemented, which would include erosion controls BMPs (e.g., mulches, soil binders, erosion control blankets/mats, outlet projection/energy dissipation devices), sediment controls (e.g., silt fences, fiber rolls, gravel bags), tracking controls (e.g., stabilized construction entrance/exit, entrance/outlet tire wash), wind erosion controls, non-stormwater management, and materials and water management (cleanup and containment of trash and debris, stockpile management, spill prevention and control, hazardous waste management). Implementation of the BMPs included in the SWPPP would reduce the potential for construction-related erosion and siltation at the campus.

Once operational, the Proposed Project would be fully developed with structures, hardscape, and landscape. No ground disturbance would occur during operation of the Proposed Project. As with existing conditions, stormwater runoff from the campus would flow to the City's storm drain system. In addition, bioswale planters, permeable pavement, and subsurface infiltration systems would be installed to capture and filter stormwater runoff from the campus. Furthermore, the Proposed Project would result in a net decrease in impervious surface area by 0.64 acre at the completion of Phase 4. As such, substantial erosion and siltation would not occur during operations. Therefore, impacts related to erosion and siltation would be less than significant and no mitigation is required.

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

Less-than-significant Impact. During construction of the Proposed Project, drainage patterns and runoff quantities on the campus may be temporarily altered due to grading activities. Compliance with a project-specific SWPPP, and specifically the use of runoff-control devices, would ensure that runoff quantities are controlled to the extent practicable, to prevent flooding or ponding of excess water on and off the campus.

During operation of the Proposed Project, drainage patterns of the campus would remain similar to existing conditions. Phases 1 and 4 would result in a net decrease in impervious surface area by approximately 0.43 acre and 0.33 acre, respectively, while Phases 2 and 3 would each result in a net increase of 0.06 acre of impervious surfaces. As such, the Proposed Project would result in a total net decrease in impervious surface area by 0.64 acre, thereby decreasing the amount of future stormwater discharge from the campus compared to existing conditions. This reduction in impervious surfaces would decrease the rate and amount of surface runoff volumes from the campus. In addition, bioswale planters, permeable pavement, and subsurface infiltration systems would be installed to capture and filter stormwater runoff from the campus. Any surface runoff not captured and retained onsite would continue to drain into existing catch basins and the municipal storm drain system. Because the Proposed Project would be designed to have adequate drainage, flooding or ponding of excess water would be avoided. Therefore, impacts related to flooding would be less than significant and no mitigation is required.

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. During construction of the Proposed Project, drainage patterns and runoff quantities on the campus may be temporarily altered due to grading activities. Compliance with a project-specific SWPPP, and specifically the use of runoff-control devices, would ensure that runoff quantities are controlled to the extent practicable, to avoid overwhelming the existing stormwater drainage system. Furthermore, the SWPPP would contain project-specific BMPs that would help prevent construction-related pollutants, such as sediments and fuels for equipment, from entering stormwater runoff. Through compliance with the SWPPP, construction of the Proposed Project would not create a substantial source of polluted runoff or substantially increase runoff volumes leading to exceedances in the storm drain capacity.

As described in Section 3.10.2(a), stormwater runoff volumes during the Proposed Project's operations would decrease from existing conditions due to a net reduction in overall impervious surfaces. By phase, Phases 1 and 4 would result in a net decrease in impervious surface area by approximately 0.43 acre and 0.33 acre, respectively, while Phases 2 and 3 would each result in a net increase of 0.06 acre of impervious surfaces, resulting in an overall decrease in impervious surfaces by 0.64 acre at the completion of Phase 4. Furthermore, the Proposed Project would not change existing land uses at the campus and would not introduce new sources of pollutants. For these reasons, operational activities at the campus would not create or contribute to additional runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts related to stormwater drainage system capacity and polluted runoff would be less than significant and no mitigation is required.

iv) Impede or redirect flood flows?

No Impact. As discussed in Section 3.10.1, the campus is within Zone X, which is an area of minimal flood hazard (FEMA 2021). The Proposed Project would not place new structures within a flood hazard area. Therefore, the Proposed Project would have no impact related to impeding or redirecting flood flows and no mitigation is required.

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

No Impact. The campus is approximately 1.3 miles inland from the Pacific Ocean, at an elevation of approximately 139 feet above mean sea level. As discussed in Section 3.10.1, the campus is not within a flood or tsunami hazard area and is not in proximity to an enclosed body of water that is susceptible to seiche (FEMA 2021, CGS 2009). Therefore, the Proposed Project would not risk release of pollutants due to the Proposed Project's inundation. No impact would occur, and no mitigation is required.

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

Less-than-significant Impact. The potential for the Proposed Project to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan is discussed below.

Water Quality Control Plan

The campus is under the jurisdiction of the Los Angeles RWQCB. The Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan), which was adopted on September 11, 2014, is the water quality control plan for the Los Angeles RWQCB. The Basin Plan contains the region's water quality regulations and programs for implementing these regulations (LARWQCB 2014).

Construction activities would be subject to the requirements of the Los Angeles RWQCB to ensure that stormwater pollutants resulting from construction would not substantially degrade water quality. As discussed in Section 3.10.2(a) above, the Proposed Project would be subject to the requirements of the NPDES Construction General Permit. To comply with the General Permit, an NOI for stormwater discharges associated with construction activities and a Report of Waste Discharge must be submitted to the Los Angeles RWQCB. In addition, the Proposed Project would

include construction site BMPs identified in the SWPPP to control erosion and sedimentation. Construction activities would also comply with all applicable federal, state, and local requirements to reduce the potential for the release of hazardous waste and other contaminants into groundwater (refer to Section 3.9.2[a] for a list of applicable requirements related to hazardous materials and wastes).

Implementation of the Proposed Project would not change the existing land use of the campus. The Proposed Project would not introduce new point sources of pollutants or discharges, such as those associated with industrial facilities. Because the Proposed Project would result in a net decrease in impervious surfaces, stormwater discharges from the campus would be of reduced volume and similar quality to existing conditions. The District would be required to obtain permits for connections to the municipal storm drain and sanitary sewer systems and would adhere to the specified effluent limitations. Therefore, construction and operation of the Proposed Project would comply with water quality regulations established in the Basin Plan.

Sustainable Groundwater Management Plan

The Santa Monica Basin Groundwater Sustainability Agency (SMBGSA), which formed in 2017, is responsible for ensuring ongoing sustainable management of the groundwater resources of the Subbasin. SMBGSA submitted the Santa Monica Basin Groundwater Sustainability Plan (GSP) to DWR on January 27, 2022. As demonstrated in the GSP, SMBGSA anticipates that groundwater in the Subbasin will continue to be managed sustainably without the need for projects and management actions. However, the SMBGSA identifies projects and management actions that may be necessary to respond to changing conditions in the Subbasin in the future (SMBGSA 2022).

As described in Section 3.10.2(b), construction activities would result in a temporary increase in water consumption for cleaning surfaces, mixing with concrete or other materials, suppressing dust, and establishing plants. Water needed for construction activities would not substantially increase the demand for groundwater supplies.

Once operational, the Proposed Project would not result in an increase in student enrollment or faculty at the Will Rogers campus. Therefore, the Proposed Project would not increase demands for water usage at the campus compared to existing conditions. In addition, the Proposed Project would be designed to meet the water conservation requirements of the most current Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Energy Code). The Proposed Project would also incorporate design considerations to improve water efficiency to help meet or exceed the District's Collaborative for High Performance Schools (CHPS) minimum criteria by 25 percent. High efficiency plumbing fixtures would be installed in the new and renovated facilities. Furthermore, landscaping would consist of drought-tolerant and native plants that minimize water use. Therefore, operation of the Proposed Project would not increase the demand for groundwater supplies beyond existing conditions.

Under existing conditions, the campus is primarily impervious and, therefore, does not provide for substantial groundwater recharge. The Proposed Project would result in a total net decrease in impervious surface area of 0.64 acre and the campus would remain primarily impervious. Bioswale planters, permeable pavement, and subsurface infiltration systems would be installed to capture and infiltrate stormwater runoff from the campus. Therefore, the Proposed Project would not interfere with groundwater recharge.

Summary

Because the Proposed Project would comply with all applicable permits and regulations governing the protection of water quality, the Proposed Project would not conflict with or obstruct implementation of the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. Additionally, the Proposed Project would not result in the unsustainable consumption of water resources or otherwise interfere with groundwater recharge of the Santa Monica Subbasin; therefore, the Proposed Project would not conflict with or obstruct implementation of the Santa Monica Basin GSP. Therefore, impacts related to water quality control plans and sustainable groundwater management plans would be less than significant and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts on hydrology and water quality and no mitigation measures are required.

3.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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?	☐	☐	☒	☐

3.11.1 Environmental Setting

The existing campus has a land use designation of Institutional/Public Lands in the City's General Plan and is zoned as Institutional/Public Lands (PL) by the City, while the proposed expansion parcel at 1515 Maple Street is designated as Low Density Housing in the City's General Plan and is zoned Low Density Residential (R2) by the City (City of Santa Monica 2021a and 2021b). The area surrounding the campus is primarily developed with public/institutional and residential land uses. John Adams Middle School is located to the northeast of the campus, across 16th Street. Other land uses immediately surrounding the campus include multi-family residences to the northwest and single-family residences to the southwest and southeast.

3.11.2 Discussion

a) Physically divide an established community?

No Impact. The Proposed Project's improvements would be confined to the Will Rogers campus. The Proposed Project would not involve features, such as the construction of new roadways, installation of substantial aboveground infrastructure (e.g., substations), easements through established neighborhoods, or permanent street or sidewalk closures. Therefore, the Proposed Project would not physically divide an established community. No impact would occur, and no mitigation is required.

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 campus is within the City of Santa Monica and is subject to the City's Zoning Code. The existing campus is zoned for Institutional/Public Lands (PL) and has a land use designation of Institutional/Public Lands in the City's General Plan. Schools are allowable within the Institutional/Public Lands designation, as established in Section 9.15.010 of the City's Municipal Code. The Proposed Project would not change the campus' existing land use and would continue to be consistent with the City's land use designation for the site. Regarding the proposed addition of the District's property located at 1515 Maple Street, the City of Santa Monica Planning Commission determined on June 1, 2022, that the proposed addition of this parcel, which designated and zoned for residential uses, for incorporation into the campus is consistent with the General Plan and associated Zoning Ordinance (City of Santa Monica 2022).

Phase 4 would include a new two-story elementary classroom building. At this time, no specific design is available for the new two-story classroom building, as Phase 4 is currently unfunded. While it is anticipated that the new two-story building would not exceed the 32-foot height limit in the City's Municipal Code, rooftop equipment and

associated screening materials required by Section 9.21.140 of the City's Municipal Code could potentially extend above the roof height limit. However, this exceedance is acceptable pursuant to Section 9.21.160 of the City's Municipal Code if the equipment and screening materials do not extend greater than 12 feet above the 32-foot roof line height limit. Furthermore, as explained and substantiated in this IS/Proposed MND, the height of the proposed two-story classroom building would be consistent with the heights of other nearby buildings and would not result in any significant impacts on the environment. As such, the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation. Therefore, impacts would be less than significant, and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts associated with land use and planning and no mitigation measures are required.

3.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources.				
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be 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?	☐	☐	☐	☒

3.12.1 Environmental Setting

The California Surface Mining and Reclamation Act of 1975 requires the State Geologist to classify land into Mineral Resource Zones (MRZs) according to the known or inferred mineral potential of that land. The California Division of Mines and Geology (now known as the CGS) classifies the campus as MRZ-3, which indicates areas containing mineral deposits, the significance of which cannot be evaluated from available data (Division of Mines and Geology 1979).

The Conservation Element of the City of Santa Monica General Plan indicates that the only past mineral activities that occurred within the City included the removal of sand from beaches for construction activities; however, these activities have been discontinued and are now prohibited. There are no existing mineral exploration or mining activities within the City of Santa Monica (City of Santa Monica 1975).

3.12.2 Discussion

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?

No Impact. As discussed in Section 3.12.1, the City of Santa Monica General Plan indicates that there are no existing mineral exploration or mining activities within the City of Santa Monica (City of Santa Monica 1975). The campus has a land use designation of Institutional/Public Lands and is developed with an operating elementary school campus. As such, it is not currently used for mineral resource extraction, and the City does not have plans to use the site for mineral resource extraction in the future. Therefore, the Proposed Project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impact would occur, and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts on mineral resources and no mitigation measures are required.

3.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.Noise.				
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans?	☐	☒	☐	☐
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?	☐	☐	☐	☒

3.13.1 Environmental Setting

Prior to discussing the environmental setting and applicable noise standards, the following definitions of technical noise terms referenced throughout this section are provided.

- **Equivalent Continuous Sound Level (L_{eq}):** L_{eq} represents an average of the sound energy occurring over a specified period. In effect, L_{eq} is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period (Caltrans 2013:2-48). For instance, the 1-hour equivalent sound level, also referred to as the hourly L_{eq}, is the energy average of sound levels occurring during a 1-hour period and is the basis for noise abatement criteria used by the California Department of Transportation (Caltrans) and Federal Transit Administration (FTA) (Caltrans 2013:2-47; FTA 2006:2-19).
- **Maximum Sound Level (L_{max}):** L_{max} is the highest instantaneous sound level measured during a specified period (Caltrans 2013:2-48; FTA 2006:2-16).
- **Minimum Sound Level (L_{min}):** L_{min} is the lowest instantaneous sound level measured during a specified period (Caltrans 2013:2-48; FTA 2006:2-16).
- **Vibration Decibels (VdB):** VdB is the vibration velocity level in decibel scale (FTA 2018: Table 5-1).
- **Peak Particle Velocity (PPV):** PPV is the peak signal value of an oscillating vibration waveform, usually expressed in inches per second (in/sec) (FTA 2018: Table 5-1).

The area surrounding the campus is primarily developed with public/institutional and residential land uses. John Adams Middle School is located to the northeast of the campus, across from 16th Street. Santa Monica College is located further northeast of the campus, along the intersection of 16th Street and Pearl Street. Low-density residential housing is located immediately adjacent to the campus to the northwest and southeast. Neighborhood commercial

uses, including retail stores, restaurants, markets, and offices, are located further southeast of the campus, along Ocean Park Boulevard. Across from 14th Street to the southwest of the campus are single family residences. The I-10 Freeway is located approximately 0.6-mile northwest of the campus, and the Santa Monica Municipal Airport is located approximately 0.75-mile to the southeast. The campus and surrounding area experience noise associated with the surrounding land uses, noise from traffic on the local arterial roadways, as well as noise from the distant freeway, occasional noise from distant aircraft, and ambient community noise.

Existing nearby sensitive receptors include residential neighborhoods surrounding the school, with the nearest residences located along 14th Street, Maple Street, and 16th Street. Three nearby sensitive receptors were identified for the analysis. The first identified receptor is a single-family residence located approximately 100 feet south from the center of the school construction at 1507 Maple Street. The second receptor identified is 180 feet west of the campus at the nearby single-family residence at 1352 Pine Street. The final sensitive receptor identified is a multi-family complex located 40 feet north of the center of project construction at 2323 14th street. Refer to the analysis in Section 3.13.2 for more details regarding individual receptors that were evaluated.

An ambient noise survey was conducted on June 2, 2022. The purpose of the survey was to establish existing noise conditions in the campus vicinity, as well as noise levels at existing noise sensitive receptors surrounding the campus that could potentially be affected from construction and operational noise associated with the Proposed Project. Several short-term noise measurements were taken at each location during peak outdoor student activity, which includes student drop-off at school in the morning at 8:00 a.m., recess/lunch hours at 12:00 p.m., and student pick-up/departure from school at 3:00 p.m. Thus, measurements represent average, minimum, and maximum noise levels during the times of the day when noise associated with the existing school is generally loudest. The location of each noise measurement is shown on Figure 3.13-1 and the measured ambient noise levels are shown in Table 3.13-1 with corresponding location numbers. Noise level measurements were taken in accordance with the standards of the American National Standards Institute, using a Larson Davis Laboratories Model 820 precision integrating sound level meter.

Table 3.13-1 Summary of Existing Ambient Noise Measurements

Location[1]	Time	Measurement Duration	A-Weighted Sound Level (dB)		
			L_{eq}	L_{max}	L_{min}
ST-1	8:48 a.m.	15 Minutes	61.4	72.2	46.7
ST-2	7:52 a.m.	15 Minutes	58.7	79.0	43.2
ST-3	8:15 a.m.	15 Minutes	64.3	83.3	49.3
ST-1	12:55 p.m.	15 Minutes	63.1	79.1	46.1
ST-2	12:30 p.m.	15 Minutes	57.1	69.7	47.7
ST-3	12:02 p.m.	15 Minutes	61.9	77.4	51.7
ST-1	3:50 p.m.	15 Minutes	62.4	71.7	50.0
ST-2	3:28 p.m.	15 Minutes	53.9	72.0	46.8
ST-3	3:02 p.m.	15 Minutes	65.2	82.4	51.3

Notes: ST = short-term measurement; L_{eq} = Leq (equivalent continuous sound level) is defined as the steady sound pressure level which, over a given period, has the same total energy as the actual fluctuating noise; L_{max} = the highest sound level measured during a single noise event; L_{min} = the lowest sound pressure level within the measuring period.

[1] Refer to Figure 3.13-1 for ambient noise level measurement locations

Source: Data collected by Ascent Environmental in 2022.

Source: Data adapted by Ascent Environmental in 2022

Figure 3.13-1 Noise Measurement Locations

APPLICABLE NOISE STANDARDS

California Code of Regulations, Title 5

The California Code of Regulations, Title 5 states the following for schools that are being developed in the State of California:

- If the proposed site is within 1,500 feet of a railroad track easement, a safety study shall be done by a competent professional trained in assessing cargo manifests, frequency, speed, and schedule of railroad traffic, grade, curves, type and condition of track need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. In addition to the analysis, possible and reasonable mitigation measures must be identified.
- The site shall not be adjacent to a road or freeway that any site-related traffic and sound level studies have determined will have safety problems or sound levels which adversely affect the educational program.
- The district shall consider environmental factors of light, wind, noise, aesthetics, and air pollution in its site selection process.

California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL (community noise equivalent level) or higher. Acoustical studies that accompany building plans for noise sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Federal Transit Administration

The Federal Transit Administration (FTA) Division of Environmental Analysis created the *Transit Noise and Vibration Impact Assessment Manual*, which provides guidance to engineers, planners, and consultants in assessing vibration from construction, operation, and maintenance of projects. The manual also provides general information on the potential effects and levels of vibration on people and vibration- sensitive land uses. For the purposes of providing a recognized threshold for annoyance from vibration, the vibration impacts analysis for the Proposed Project references the FTA threshold of approximately 80 vibration velocity decibels (VdB) as the maximum level at which continuous vibration causes annoyance (FTA 2018:126). In terms of vibrational impacts causing damage to nearby structures, the FTA threshold of approximately 0.2 inches/second peak particle velocity (PPV) was used in this analysis (FTA 2018:126).

City of Santa Monica General Plan

The City of Santa Monica's General Plan Noise Element (City of Santa Monica 1992) contains goals, policies, and actions to address noise within the City. The City has established acceptable exterior and interior noise level standards for assessing land use compatibility of proposed land uses with the noise environment, which are set forth in the City's General Plan Noise Element. The following tables are the primary tools that allow the City to ensure integrated planning for compatibility between land uses and outdoor noise. Table 3.13-2, which is Table 1 in the Santa Monica General Plan Noise Element, shows design standards to be used in the Proposed Project's design stage.

Table 3.13-2 Land Use/Noise Compatibility Matrix

Land Use Categories		Compatible Land Use Zones (noise levels expressed in units of CNEL)						
Categories	Uses	<55	55-60	60-65	65-70	70-75	75-80	>80
Residential	Single Family, Duplex, Multiple Family	A	A	B	B	C	D	D
Residential	Mobile Home	A	A	B	C	C	D	D
Commercial Regional, District	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D
Commercial Regional, Village	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	A	B	B	C
Commercial, Industrial Institutional	Office Building, Research and Development, Professional Offices, City Office Building	A	A	A	B	B	C	D
Commercial, Recreation, Institutional, Civic Center	Amphitheatre, Concert Hall, Auditorium, Meeting Hall	B	B	C	C	D	D	D
Commercial, Recreation	Children's Amusement Park, Miniature Golf Course, Go- cart Track, Equestrian Center, Sports Club	A	A	A	B	B	D	D
Commercial, General, Special, Industrial, Institutional	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Institutional, General	Hospital, Church, Library, Schools' Classroom, Day Care	A	A	B	C	C	D	D
Open Space	Parks	A	A	A	B	C	D	D
Open Space	Golf Course, Cemeteries, Nature Centers/Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
Agriculture	Agriculture	A	A	A	A	A	A	A

Notes: Zone A (Clearly Compatible): Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Zone B (Compatible with Mitigation): New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice. Note that residential uses are prohibited with Airport CNEL greater than 65.

Zone C (Normally Incompatible): New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.

Zone D (Clearly Incompatible): New construction or development should generally not be undertaken.

Source: City of Santa Monica 1992: Table 1

City of Santa Monica Municipal Code Noise Ordinance

The City of Santa Monica Municipal Code (City of Santa Monica 2015) incorporates specific noise standards to control stationary noise (e.g., mechanical heating and ventilation systems, construction operations) within the City. Article 4, "Public Welfare, Morals and Policy" of Chapter 4.12, "Noise") establishes specific designated noise zones, exterior noise and vibration level standards, exemptions, and abatement recommendations for stationary noise. The following subsections include relevant text from the City's noise ordinance

4.12.025 - General Regulation

It shall be unlawful for any person to make, produce, maintain, cause or permit to be made any noises or sounds in such manner so as to unreasonably disturb the peace, quiet and comfort of persons of normal sensitivity within the area of audibility or which are so harsh or prolonged or unnatural or unusual in their use, time or place as to cause physical discomfort to any person of normal sensitivity within the area of audibility.

The factors to be considered in determining whether a violation of this Section has occurred shall include, but are not limited to, the following:

- The volume of the noise;
- The intensity and duration of the noise;
- Whether the noise is constant, recurrent or intermittent;
- The nature and zoning of the area within which the noise emanates;
- The proximity of the noise to noise-sensitive land uses, such as hospitals, schools, recovery facilities, or any facility that regularly accommodates a person or persons who may be sleeping;
- The volume and intensity of the background noise;
- The density of the land uses of the area within which the noise emanates; and
- The time of day or night the noise occurs.

4.12.030 - Exemptions

(a) The following activities shall be exempt from the provisions of this Chapter, except for Sections 4.12.025, 4.12.100, and 4.12.105, or unless otherwise expressly identified in any section of this Chapter:

  (1) Activities conducted on public or private school grounds, including, but not limited to, school athletic and school entertainment events;

  (2) Community events;

  (3) Activities conducted on public property that is generally open to the public, including, but not limited to, streets, sidewalks, alleys, parkways, parks, and beaches.

(b) The following activities shall be exempt from the provisions of this Chapter unless otherwise expressly identified in any section of this Chapter:

  (1) Any alarm or emergency device, apparatus or equipment regulated by Municipal Code Sections 3.56.010 through 3.60.010;

  (2 Activities undertaken by governmental agencies to protect public health, safety or welfare;

  (3) Any activity regulated by Santa Monica Municipal Code Subchapter 10.04.04 (Aircraft Noise Abatement Code);

  (4) Any activity to the extent regulation thereof has been preempted by State or Federal law.

  (5) Any non-commercial activity conducted outdoors:

    (A) Between the hours of seven a.m. and ten p.m.;

    (B) On public property that is generally open to the public, including, but not limited to, streets, sidewalks, alleys, parkways, parks, and beaches;

    (C) Not on the Santa Monica Pier or the Third Street Promenade;

    (D) Not immediately abutting any exclusively residential use; and

    (E) Not violating Section 4.12.025 of this Code with respect to any residential, hospital or school use.

Section 4.12.060 - Exterior Noise Standards

(a) The following noise standards, unless otherwise specifically indicated, shall apply to all property with a designated noise zone during the times indicated:

Table 3.13-3 City of Santa Monica Exterior Noise Standards Leq

Noise Zone	Time Interval	Allowable L_{eq}	
		15-Minute Continuous Measurement Period	5-Minute Continuous Measurement Period
Zone I (Residential)	Monday—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
Zone II (Commercial)	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
Zone III (Manufacturing and Industrial)	All Days of Week		
	Anytime	70 dBA	75 dBA

Source: City of Santa Monica Noise Ordinance 2004.

(b) For each Noise Zone, the allowable exterior equivalent noise level shall be reduced by five dBA for impulsive or simple tone noise, or for noises consisting of speech or music. If the ambient noise level exceeds the allowable exterior noise level standard, the ambient noise level shall be the standard.

(c) Except as provided for in this Chapter, no person shall at any location within the City create any noise or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes:

(1) The equivalent noise level to exceed the noise standards established in subsection (a) of this Section for the noise zone where the measurement is taken; or

(2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits established in subsection (a) of this Section for the noise zone where the measurement is taken plus twenty dBA for any period of time.

(d) If any portion of a parcel is located within one hundred feet of a noise zone with higher noise standards as compared to the noise standards for the noise zone in which the parcel is located, then the maximum allowable exterior equivalent noise level for the entire parcel shall be the average of the noise standards of the two noise zones. However, any noise level measurement must be taken at least twenty-five feet from the parcel line of the source of the noise.

(e) Construction activity shall be subject to the noise standards set forth in Section 4.12.110.

Section 4.12.070 - Vibration

Notwithstanding other sections of this Chapter, it shall be unlawful for any person to create, maintain or cause any ground vibration that is perceptible without instruments at any point on any property. For the purpose of this Chapter, the perception threshold shall be presumed to be more than 0.05 inches per second root-mean-square (RMS) velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft shall be exempt from this Section.

Section 4.12.110 - Restrictions on Demolition, Excavation, Grading, Spray Painting, Construction, Maintenance or Repair of Buildings

(a) No person shall engage in any construction activity during the following times anywhere in the City:

(1) Before eight a.m. or after six p.m. on Monday through Friday, except that construction activities conducted by employees of the City of Santa Monica or public utilities while conducting duties associated with their employment shall not occur before seven a.m. or after six p.m. on Monday through Friday;

(2) Before nine a.m. or after five p.m. on Saturday;

(3) All day on Sunday;

(4) All day on New Year' s Day, Martin Luther King' s Birthday, President' s Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, as those days have been established by the United States of America

(b) Except as set forth in subsection (d) of this Section, the noise created by construction activity shall not cause:

(1) The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of this Chapter, for the noise zone where the measurement is taken, plus twenty dBA, or

(2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of this Chapter for the noise zone where the measurement is taken plus forty dBA, for any period of time.

(c) Prior to the issuance of a building permit, all development projects located within five hundred feet of any residential development or other noise sensitive land uses must submit a list of equipment and activities required during construction. In particular, this list shall include the following:

(1) Construction equipment to be used, such as pile drivers, jackhammers, pavement breakers or similar equipment.

(2) Construction activities such as twenty-four hour pumping, excavation or demolition;

(3) A list of measures that will be implemented to minimize noise impacts on nearby residential uses;

(d) Any construction that exceeds the noise levels established in subsection (b) of this Section shall occur between the hours of ten a.m. and three p.m., Monday through Friday.

(e) 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. The person obtaining the permit shall provide notification to persons occupying property within a perimeter of five hundred feet of the site of the proposed construction activity prior to commencing work pursuant to the permit. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit. Applications for such permit shall be in writing, shall be accompanied by an application fee and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the Building Officer. No permit shall be issued unless the application is first approved by the Director of Environmental and Public Works Management, the Building Officer, the Chief of Police and the Director of Planning and Community Development. The City Council shall establish by resolution fees for the filing and processing of the application required by this subsection (e) and any required compliance monitoring. This fee may be revised from time to time by resolution of the City Council.

Section 4.12.120 - Posting of Construction Signs

(a) There shall be displayed at every site covered by this Chapter where work activities requiring a City permit are being conducted, a sign in English and Spanish reading substantially as follows: "Attention All Employees and Subcontractors. Santa Monica construction/demolition work times are: Monday through Friday, eight a.m. until six p.m.; Saturday nine a.m. until five p.m.; Sundays and holidays, no work permitted." In addition, the sign shall indicate the City telephone numbers where violations of this Section can be reported, the location of the job site, and the permit number issued authorizing the work.

(b) Signs required by this Section shall be continually placed prominently at the primary entrance to the work site so that they are clearly visible to the public and to all employees, contractors, subcontractors and all other persons performing work at the site, so long as activity covered by this Section is occurring.

(c) Each sign required to be displayed pursuant to this Section shall be obtained from the Building and Safety Division. The Building and Safety Division shall charge for each sign a fee equal to the City's cost of printing the sign.

(d) Each Department or agency of the City that is required to inspect the work site is directed only to inspect sites that comply with this Section.

(e) This Section shall apply to construction pursuant to any building permit issued after the effective date of the ordinance codified in this Chapter.

Section 4.12.130 - Location, Screening and Noise Measurements of Mechanical Equipment
All development project applications must demonstrate compliance with or contain the following information:

(a) A list of all permanent mechanical equipment to be placed outdoors and all permanent mechanical equipment to be placed indoors which may be heard outdoors. All such equipment shall require a noise analysis to demonstrate compliance with Section 4.12.060 prior to the issuance of a building permit for the development project.

(b) Mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot unless it can be shown that the noise will comply with the requirements of Section 4.12.060. Roof locations may be used when the mechanical equipment is installed within a noise attenuating structure.

(c) Final approval of the location of any mechanical equipment will require a noise test to demonstrate compliance with Section 4.12.060. Equipment for the test shall be provided by the owner or contractor and the test shall be conducted by the owner or contractor. A copy of noise test results on mechanical equipment shall be submitted to the Community Noise Officer for review to ensure that noise levels do not exceed maximum allowable levels for the applicable noise zone.

3.13.2 Discussion

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 in other applicable local, state, or federal standards, or a substantial temporary or permanent increase in noise levels above existing ambient levels that could result in an adverse effect on humans?

Less than Significant with Mitigation Incorporated. This discussion includes an analysis of short-term construction noise and long-term operational noise. Because noise standards are often regulated differently, depending on the source (e.g., stationary source, transportation source), it follows that each source would be evaluated using the appropriate adopted noise source and associated methodology to analysis. Thus, significance is concluded for this resource topic based on the type of noise impact (temporary or permanent) that could occur as a result of the Proposed Project's implementation.

Construction Noise (Temporary)

To assess potential short-term (construction-related) noise impacts, sensitive receptors and their relative exposure were identified. Project-generated construction source noise levels were determined based on methodologies, reference emission levels, and usage factors from FTA's *Guide on Transit Noise and Vibration Impact Assessment* methodology (FTA 2018) and FHWA's *Roadway Construction Noise Model User's Guide* (FHWA 2006). Reference levels for noise emissions for specific equipment or activity types are well documented and the usage thereof common practice in the field of acoustics.

Construction typically a temporary activity and noise from construction ceases once construction is complete. Construction noise levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the noise source and receiver. The Proposed Project is anticipated to be constructed over four phases, with construction anticipated to commence in June 2023 and be completed in December 2030.

Construction of the Proposed Project would involve the removal/demolition of 15 buildings, construction of three new buildings, renovation and reuse of seven existing classroom buildings and outdoor spaces, and reconfiguration of outdoor and parking/transportation areas. Phase 1, which is currently funded, would involve the demolition/removal of the portable classrooms (P1-P6), construction of a new one-story early education classroom building and associated play yards, and construction of a new play field. Subsequent phases would be constructed as funding becomes available and would include removal of five additional existing modular classrooms, removal of four one-story classroom buildings, expansion and reconfiguration of an existing parking lot, construction of a new student drop-off/pick-up area, repurposing existing classrooms into STEM classrooms, repurposing outdoor spaces into outdoor classrooms, construction of a new multipurpose room/food services facility, installation of a learning garden, construction of a new parking lot, and construction of a new two-story classroom building. Each phase of the Proposed Project would occur independently and would not occur concurrently or overlap in time. The shortest phase (Phase 2) would take approximately 12 months to complete while the longest phase (Phase 1) would take approximately 19 months to complete. Thus, construction noise would move about the entire site over the duration of the Proposed Project, and therefore would not expose the same receptors to construction noise over the entire 7-year buildout of the Proposed Project. The school would remain open and continue operations during construction activities. Santa Monica Municipal Code Section 4.12.1.110 limits construction to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday. Construction is not allowed on Sundays or on holidays. The City may grant the District a waiver to allow construction to begin at 7:00 a.m. The District would be required to follow this code and any allowances made by the City. However, for purposes of determining potential noise impacts under CEQA, if construction activities did occur during the early morning hours (i.e., 7:00 a.m.), outside of the allowed daytime hours when people are more likely to be disturbed, nighttime noise standards would be applicable.

Equipment that would be used during construction would include dozers, tractors/loaders/backhoes, forklifts, compaction rollers, air compressors, water trucks, and excavators. Construction equipment with substantially higher noise-generation characteristics, such as pile drivers, rock drills, and blasting equipment, would not be used for construction of any phase of the Proposed Project. Construction noise levels are influenced by many variables, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the campus. The typical maximum noise levels (i.e., L_{max}) for various pieces of construction equipment at a distance of 50 feet are presented in Table 3.13-4. However, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

As shown in Table 3.13-4, the maximum noise levels at 50 feet for typical construction equipment could result in levels up to 85 dB. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance from the source. The Proposed Project's construction would take place as close as 40 feet and as far as 180 feet from existing noise-sensitive uses depending on which phase is under construction.

Using the calculation methods consistent with FTA guidance, Proposed Project-specific construction information (e.g., types and number of construction equipment by phase), and model defaults, noise levels from construction were calculated for a representative range of distances, as presented in Table 3.13-5. The FTA construction model inputs and outputs are provided in Appendix D. As noted in Section 3.13.1, three nearby sensitive receptors were identified for the analysis of the Proposed Project's potential noise impacts. A summary of modeled construction noise levels at these receptors is presented below in Table 3.13-5.

Table 3.13-4 Typical Noise Levels from Construction Equipment

Equipment Type	Typical Noise Level (L_{max} dBA) @ 50 feet
Backhoe	80
Concrete Mixer	85
Compactor	80
Crane/Lift	85
Compressor (Air)	80
Dozer	85
Dump Truck	84
Excavator	85
Flat Bed Truck	84
Front End Loader	80
Generator	70
Grader	85
Paver	85
Roller	85
Pickup Trucks	54

Notes: Assumes all equipment is fitted with a properly maintained and operational noise control device, per manufacturer specifications. Noise levels listed are manufacture-specified noise levels for each piece of heavy construction equipment.

Source: FTA 2018: 176.

Table 3.13-5 Construction Noise Model Results Summary

Noise-Sensitive Receptor	Distance to Receptor from Construction Center (feet)	Construction Phase	Estimated L_{eq} at 50 feet, dB	Estimated L_{eq} at Sensitive Location dB	Change Over Highest Existing Noise (dB)
1507 Maple Street (Single Family Residence)	100	Demolition	82.2	76.2	+17.5
		Grading	83.6	77.5	+18.8
		Paving	84.2	78.2	+19.5
		Construction	76.0	70.0	+11.3
		Architectural Coating	76.0	70.0	+11.3
1352 Pine Street (Single-Family Residence)	180	Demolition	82.2	71.1	+8
		Grading	83.6	72.4	+9.3
		Paving	84.2	73.0	+9.9
		Construction	76.0	64.9	+1.8
		Architectural Coating	76.0	64.9	+1.8
2323 14th Street (Multi-Family Residence)	40	Demolition	82.2	84.2	+1.9
		Grading	83.6	85.5	+20.3
		Paving	86.1	86.1	+20.8
		Construction	76.0	78.0	+12.8
		Architectural Coating	76.0	78.0	+12.8

Source: Appendix D.

As shown in Table 3.13-5, the highest noise levels at nearby sensitive receptors are predicted to occur during paving activities, where noise levels from construction activities would be as high as 86.1 dBA L_{eq} and 90.6 dBA L_{max} at the nearest existing residences, approximately 40 feet from the center of construction activity. Note that propagating noise levels from the center of the construction site is appropriate in the field of acoustics, especially when evaluating construction noise, to account for the random pattern of noise-generating equipment moving about the site that generate different noise levels throughout the day; thus, this approach adjusts for these noise fluctuations to better estimate noise exposure from the construction site at offsite receivers.

Construction noise levels would typically range from approximately 64.9 to 86.1 dBA L_{eq} based on which phase is being developed. The City of Santa Monica has established maximum noise levels intended to protect the community from noise impacts. Section 4.12.110 of the City's Municipal Code identifies noise standards for construction activities, allowing an increase of 40 dBA as an L_{max} and 20 dBA as an L_{eq} from the exterior noise standards in Table 3.13-3. Applying this adjustment, the resultant applicable construction noise standards are:

- Nighttime: 70 dBA L_{eq} and 90 dba L_{max}
- Daytime: 80 dBA L_{eq} and 100 dBA L_{max}

Consistent with FTA-recommended methods for evaluating construction noise, the L_{eq} noise metric is the most appropriate, and therefore was used as the basis for this analysis. Using the modeled worst case construction noise levels of 86.1 dBA L_{eq} for construction activity occurring during the daytime hours, the daytime L_{eq} threshold of 80 dBA would be exceeded. For construction activity that would occur during the nighttime hours, which would apply for the hours of construction from 7:00 a.m. to 8:00 a.m., L_{eq} thresholds of 70 dBA would be exceeded.

In typical noisy environments, changes in noise of 1–2 dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness (Caltrans 2013: 2-10). Considering increases in noise from construction activity, the loudest construction activity would result in a 23 dBA L_{eq} increase in ambient noise levels compared to the existing loudest ambient noise level of 63.1 dBA L_{eq} measured at 2323 14th Street (Noise Measurement Location 1 on Figure 3.13-1). This increase in noise levels during peak construction activity would be perceived as more than a doubling of the existing noise levels. Construction noise levels would result in an exceedance of applicable noise standards and would result in a substantial increase in temporary noise at offsite sensitive receptors.

Mitigation measure **MM-NOISE-1** would require implementation of all available noise control methods, which would ensure that construction noise levels do not exceed applicable noise standards or result in excessive noise during the sensitive times of the day when people are more susceptible to noise increases. Although noise levels would be reduced to the extent feasible, noise from construction would still be audible in comparison to existing noise levels.

Effectiveness of the required mitigation measures would vary from several decibels (which in general is a relatively small change) to up to 10 decibels when a temporary noise curtain is used (which is perceived by receptors as a substantial change or a reduction by half). Installation of a noise barrier, for example, would vary in effectiveness depending upon the degree to which the line-of-sight between the source and receptor is broken, and typically ranges from 5 to 10 dB (NCHRP 1999). Installation of more effective silencers could reduce noise levels ranging from several decibels to well over 10 decibels. Reduction of idling equipment could also reduce overall noise levels from barely any reduction to several decibels. Assuming the greatest potential reduction a 10 dB, the highest construction noise levels modeled (86.1 dBA L_{eq}) would be reduced to 76.1 dBA $L_{eq.}$ Therefore, with mitigation, construction noise levels would fall below the daytime construction standards of the City of Santa Monica (i.e., 80 dBA L_{eq}) and temporary noise levels would be substantially reduced. Even with implementation of these measures during nighttime construction, noise levels would still exceed nighttime noise standards of 70 dBA L_{eq}. However, additional nighttime construction restrictions prescribed by mitigation measure **MM-NOISE-1** would ensure compliance with nighttime noise standards of 70 dBA L_{eq}.

Construction activities would fluctuate over time and during any given day. Additionally, the Proposed Project would be built out over several phases with construction equipment moving throughout the campus. Therefore,

construction activities would not affect any one off-site area for extended periods of time and an individual receptors' exposure to increased noise would be limited. Furthermore, a substantial increase in noise itself does not necessarily constitute a significant noise impact, so long as overall noise exposure is below an acceptable level (FTA 2018). This is partly because people get accustomed to the surrounding noise environment until it becomes increasingly worse, in which case continual increases in noise tend to result in more people being adversely affected. Further, as it relates to construction noise, the loudest noise-generating activities would occur during the daytime when people are less likely to be disturbed or awakened.

Regarding interior noise levels at existing educational buildings that could be exposed to construction noise, assuming construction occurs approximately 100 feet from existing educational facilities and an exterior-to-interior noise reduction from standard buildings would be expected to achieve at least a 15-dB reduction (Caltrans 2011), interior noise levels would be lowered to 63.2 dBA L_{eq}, which is lower than the typical noise levels associated with normal speech (Caltrans 2020). Further, a 15-db reduction is considered a conservative low estimate as newer structures, especially commercial and engineered structures, such as school facilities, could achieve higher reductions in the range of 20 or even 30 dB. Thus, construction noise would not be expected to result in adverse effects to the interior operation of educational buildings.

Operational Noise (Permanent)

The Proposed Project would not result in any changes to the existing operations of the school, nor would it increase the school's capacity or change its attendance boundaries. Rather, the improvements would provide larger facilities to accommodate the same number of students and staff in accordance with the District's educational specifications. Therefore, operational increases in vehicular traffic that could lead to increases in traffic noise on local roadways would not occur and this impact discussion focusses on onsite stationary sources, including new mechanical building equipment and newly expanded parking facilities.

Regarding California Code of Regulations Title 5 requirements, the nearest railroad track is located approximately 4,550 feet north of the campus; thus, the railroad noise would not be a concern for the site. Additionally, the site is not located next to any major arterial or freeway. The roads adjacent to the schools are two-way collector streets.

Stationary Noise

Projects that include the installation of new stationary equipment have potential to increase ambient noise levels. The Proposed Project would include the installation of new HVAC units placed on top of the new proposed buildings. With installation of new stationary equipment, ambient noise levels have a possibility to increase and depending on the location of new sources to receptors, could result in an exceedance of allowable noise limits. Implementation of **MM-NOISE-2** would ensure that all new stationary noise sources associated with the new buildings would comply with local noise standards by requiring the consideration of noise source placement in proximity to nearby receptors and requiring that new equipment does not exceed applicable noise standards, demonstrated by noise level testing. Regarding noise reduction considerations for stationary mechanical equipment, location of the source in proximity to a receptor is a primary consideration as noise attenuates at a rate of 6 dB per doubling of distance from the source; thus, locating a noise source further away from a receptor substantially reduces noise levels. In addition, physical barriers (e.g., roof parapets, entire building structures, equipment enclosure) that break the line-of-sight between the source and the receptor can easily achieve more than 10 dB noise reduction, which is perceived as a reduction in noise by half. Thus, proper consideration of mechanical equipment site planning and design, as required by **MM-NOISE-2**, and considering that operating noise levels would be confirmed to be in compliance prior to building operation, noise from new stationary noise sources would not result in a substantial permanent increase in noise that exceeds applicable standards or results in adverse effects to nearby sensitive receptors.

Parking Lot Noise

The Proposed Project would include new parking lots with a capacity to support 80 parked vehicles, which would also serve as a student pickup and a drop off location. Increased capacity at the proposed new parking lots could result in increases in long-term noise associated with these uses, such as people loading/unloading, doors slamming, engine

noise, and people talking. Noise levels were evaluated against the City of Santa Monica exterior noise standards shown in Table 3.13-3 and using calculation methods from FTA.

Considering that school begins at 8:30 a.m. and ends at 3:00 p.m., peak drop-off/pickup times would occur during the daytime hours (7:00 a.m. to 10:00 p.m.); therefore, the L_{eq} standards of 60 dBA (without adjustments) apply to this analysis. Consistent with reference noise levels from FTA, noise levels from car activity in the parking lots were attenuated to the nearby receptor to present the dBA L_{eq} activity. Calculations are provided in Appendix D. This analysis assumes that a total of 145 vehicles would be actively moving within the parking lot/drop off area during peak activity (i.e., during 8:00 a.m. and 3:00 p.m. when students and teachers are leaving/being picked up). Based on an assumed distance of 40 feet from the acoustical center of the parking lot to the nearest receptor at 2323 14th Street, the noise level of 145 vehicles in motion is estimated to be 56 dBA L_{eq}. As such, peak vehicular traffic in the new parking lot would not exceed applicable standard of 60 dBA L_{eq} at nearby receptors. Accordingly, operational noise impacts from the proposed new parking lot would be less than significant.

Summary

The City of Santa Monica has established maximum noise levels intended to protect the community from adverse noise impacts. As discussed above, noise levels from construction activities would be as high as 86.1 dBA L_{eq} at the nearest existing residences, which would exceed the City's daytime and nighttime noise standards. Implementation of all available noise control methods, as required by **MM-NOISE-1**, would reduce construction noise levels by approximately 10 dB. Additionally, implementation of **MM-NOISE-1** would ensure that the City's maximum noise levels are not exceeded and would reduce noise levels such that they would not be substantially adverse. Therefore, construction noise would not result in a substantial increase in noise that would adversely affect sensitive receptors. Further, construction noise would not be expected to result in adverse effects to the interior operation of educational buildings on the Will Rogers campus because exterior-to-interior noise reduction from standard buildings would be expected to lower interior noise levels by at least 15 dB. Regarding operational noise, HVAC operation would not result in an increase in noise at off-site noise receptors that would exceed applicable noise standards because all new equipment would be required to meet adopted noise standards, which would be verified prior to operation with a site-specific acoustical study and noise testing as required by **MM-NOISE-2**. Lastly, the new parking facilities would not generate noise that exceeds applicable standards at nearby receptors. With incorporation of mitigation, impacts would be reduced to less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. To assess potential short-term (construction-related) vibration impacts, sensitive receptors and their relative exposure were identified. The Proposed Project-generated construction source noise and vibration levels were determined based on methodologies, reference emission levels, and usage factors from FTA's *Guide on Transit Noise and Vibration Impact Assessment* methodology (FTA 2018).

Construction activities that might expose people to excessive vibration, resulting in sleep disturbance or prolonged disruption to daily activities/work, are more likely to occur during extended construction schedules that involve impact equipment (e.g., pile drivers, jackhammers), blasting, or large haul trucks. Section 4.12.070 Vibration establishes a perception threshold of 0.05 inches per second RMS velocity (in/sec PPV). FTA has also published guidance for conducting vibration impact analyses (FTA 2018). Based on FTA guidance, transient vibrations (such as construction activity) with a 0.2 in/sec PPV may be characterized as causing structural damage to non-engineered timber and masonry buildings, 0.3 PPV in/sec for engineered concrete masonry, and 0.5 PPV in/sec for reinforced concrete, steel, or timber structures. In addition, peak vibration levels (VdB) established by the FTA, recommend a level of 80 VdB for the purpose of evaluating disturbance to sensitive land uses where people sleep.

Section 4.12.070, "Vibration" of the City's Municipal Code exempts construction-induced vibration; however, due to the close proximity of existing structures to proposed construction activities, the potential for vibration impacts were evaluated using FTA criteria. Based on the proposed construction activity and types of equipment that would be used, the heaviest piece of construction equipment that would generate the highest levels of vibration would be a vibratory roller. Reference vibration levels for this type of equipment of 0.21 PPV in/sec and 94 VdB at 25 feet were used in this analysis (FTA 2018).

Construction activities that could involve the use of this equipment would be associated with the construction of the new parking lot, which is closest to the offsite residential receptor at 2323 14th Street, located approximately 25 feet from where vibratory equipment could be used. Based on reference levels for this equipment, the FTA recommended criteria of 0.2 PPV in/sec for structural damage and 80 VdB for human disturbance could be exceeded. Note, that these criteria would not be exceeded beyond 75 feet from the use of heavy equipment. Regarding disturbance to sensitive uses, the greatest potential for impacts exists when construction activities occur during the nighttime when people are sleeping. Based on the modeling conducted and reference vibration levels for vibratory equipment, vibration levels would exceed both the structural damage and annoyance criteria set by FTA at the nearby residential uses at 2323 14th Street. Implementation of mitigation measure MM-NOISE-3 would reduce impacts to a less-than-significant level by requiring alternative quieter construction activities and a vibration control plan that would ensure excessive vibration would not occur at nearby receivers/structures.

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

No Impact. As discussed in Section 3.9.2(e), the campus is not within the boundaries of the Airport Influence Area for the Santa Monica Municipal Airport. Additionally, the campus is not within the 65 dB CNEL noise contour for the Santa Monica Municipal Airport and would not be subject to excessive airport noise levels (City of Santa Monica 2021a). Therefore, the Proposed Project would have no impact related to exposure to excessive airport noise levels and no mitigation is required.

Mitigation Measures

MM-NOISE-1: Reduce Construction-Related Noise

To reduce noise from construction activities, the District will require all construction contractors to implement the following measures to the extent needed to reduce the noise impact to less than significant:

Construction Restrictions

- No construction activities involving the use of heavy-duty equipment, haul trucks, or other work trucks shall operate onsite outside of the following times: 8:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday. No nighttime construction shall occur on Sunday.
- Equipment Restrictions
- Locate all stationary equipment (e.g., generators, welders, dehumidifiers) on the construction site as far away from onsite educational buildings where excessive interior noise could cause a disruption (e.g., library, classroom) and adjacent residential land uses and other noise-sensitive sites as possible and no less than 100 feet from residential uses.
- Position on-site stationary equipment such that existing noise sources (e.g., roadways) or structures (e.g., existing buildings) block the line of sight between the on-site equipment and off-site sensitive land uses or onsite educational buildings where excessive interior noise could cause a disruption (e.g., library, classroom).
- All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.
- All construction equipment with backup alarms will be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. The self-adjusting backup alarms will automatically adjust to 5 dBA over the surrounding background levels. All non-self-adjusting backup alarms will be set to the lowest setting required to be audible above the surrounding noise levels. In addition to the use of backup alarms, the construction contractor may implement the use of observers, in lieu of backup alarms.

Quieter Alternative Methods and Equipment

- For any construction work that must be conducted outside of the typically allowed daytime hours (i.e., 7 a.m. to 8 a.m.), no impulsive or impact equipment shall be used.
- Each construction contractor shall use noise reducing operations measures, techniques, and equipment. This requirement will be enforced through its inclusion on all construction bid specifications for all potential construction contractors hired within the campus. The bid specifications will require that construction contractors provide an equipment inventory list for all equipment within the fleet with greater than 50 horsepower engines, that includes (at a minimum), make, model, and horsepower of equipment; operating noise levels at 50 feet, available noise control device that are installed on each piece of equipment; and associated noise reduction from the installed technology. Control devices will include, but are not limited to, high-efficiency mufflers, acoustic dampening and protected internal noise absorption layers to vibrating panels, enclosures, and electric motors. In addition, the contractor will specify how proposed alternative construction procedures will be employed to reduce noise at sensitive receptors compared to other more traditional methods. Examples include, but are not limited to, welding instead of riveting, mixing concrete off-site instead of on-site, and the use of thermal lance instead of drive motors and bits. In all cases, the requirement is that the best commercially available noise-reducing technology and noise-reducing alternative construction method will be used, provided that there are no safety concerns, engineering limits, or environmental constraints preventing it from being used. If a unique circumstance does exist that prevents an alternative quieter construction method to be used, the contractor will provide evidence to support their proposal. The noise reduction elements of construction bid submittals will be approved by the City of Santa Monica, in coordination with a qualified acoustical professional.
- Combine noisy operations (e.g., riveting, cutting, hammering) to occur in the same time period (e.g., day or construction phase), such that the overall duration of these activities is reduced to the extent practical. The total noise level produced will not be substantially greater than the level produced if the operations were performed separately, and the total duration of sensitive receptor noise exposure to substantial noise levels will be reduced.
- As specified in Section 4.12.120 of the City's Municipal Code, signage shall be posted at the campus entrance with permitted construction work hours, the Santa Monica-Malibu Unified School District telephone numbers where violations can be reported, the location of the job site, and the permit number issued authorizing the work.
- Where construction activities at any one location on the campus occur for an extended duration of more than 30 days affecting the same offsite receptor, or within 100 feet of a residential receptor, the contractor will install temporary noise curtains. For any construction activity occurring during daytime hours, noise curtains would be required for activity occurring within 100 feet of a residential receptor to ensure compliance with daytime L_{eq} standards. For any construction occurring during the nighttime hours (i.e., 6:00 p.m. to 8:00 a.m.), noise curtains will be required for activity occurring within 275 feet of a residential receptor to ensure compliance with nighttime L_{eq} standards and within 450 feet of a receptor to ensure compliance with nighttime L_{max} standards. The use of temporary noise curtains, in all cases, will meet the following parameters:
    - Install temporary noise curtains as close as possible to the boundary of the construction site within the direct line of sight path of the nearby sensitive receptor(s).
    - Temporary noise curtains will consist of durable, flexible composite material featuring a noise barrier layer bounded to sound-absorptive material on one side. The noise barrier layer will consist of rugged, impervious, material with a surface weight of at least one pound per square foot.
- In all cases, regardless of the construction methods and equipment used and construction scheduling and phasing, the above measures will be implemented by the construction contractor(s), and based on finalized construction work plans, will be verified by an acoustic professional either through on-the-ground noise monitoring during construction activities, or based on the construction work plan and specific equipment/methods to be used. At any time that established thresholds (Nighttime: 70 dBA L_{eq}; Daytime: 80 dBA L_{eq}) are exceeded at nearby sensitive receptors, construction activity must be halted until alternative methods that would reduce vibration levels are implemented.

MM-NOISE-2: Reduce Operational Stationary Noise

For all new stationary equipment associated with newly constructed buildings (e.g., HVAC equipment, back-up generators), the District shall comply with the following:

- Mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot unless it can be shown that the noise will comply with the requirements of Section 4.12.060. Roof locations may be used when the mechanical equipment is installed within a noise attenuating structure.
- Final approval of the location of any mechanical equipment will require a noise test to demonstrate compliance with Section 4.12.060. Equipment for the test shall be provided by the owner or contractor and the test shall be conducted by the owner or contractor. A copy of noise test results on mechanical equipment shall be submitted to the District for review to ensure that noise levels do not exceed maximum allowable levels for the applicable noise zone.

MM-NOISE-3: Reduce Construction-Related Vibration

Prior to commencing construction activities, the District shall retain an acoustic professional to prepare a vibration control plan that incorporates, at a minimum, the following best practices into the construction scope of work and specifications to reduce the impact of temporary construction-related vibration on nearby vibration-sensitive land uses. The vibration control plan shall be approved by the District and implemented by the contractor during project construction.

- Avoid vibratory rollers, jackhammers, or any other impulsive/vibratory equipment within 100 feet of residential uses or any occupied structure; or use alternative equipment/construction methods that generate less vibration.
- Route heavily loaded trucks away from residential streets, if possible. Select streets with the fewest homes if no alternatives are available.
- Operate earthmoving equipment on the construction site as far away from vibration sensitive uses as possible
- Phase demolition, earthmoving, and ground-impacting operations so as not to occur concurrently, and in no circumstance shall heavy-duty impact and impulsive equipment be used during the nighttime hours, established by the City of Santa Monica Municipal Code.
- Select construction methods that do not involve impact and impulsive equipment, where possible.
- In all cases, regardless of the construction methods and equipment used and construction scheduling and phasing, the vibration control plan shall be implemented by the construction contractor, and the plan, based on finalized construction work plans, shall be verified by the acoustic professional either through on-the-ground vibration monitoring during construction activities, or based on the construction work plan and specific equipment/methods to be used. At any time that FTA vibration standards are exceeded (e.g., 80 VdB or 0.2 PPV in/sec) at nearby structures, construction activity must be halted until alternative methods that would reduce vibration levels are implemented.

3.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1 Environmental Setting

According to the U.S. Census Bureau, the 2020 population in the City of Santa Monica was 93,076 residents. Based on the 2015-2019 American Community Survey, there were approximately 45,309 households in the City of Santa Monica (U.S. Census Bureau 2021). The existing Will Rogers campus does not contain residential housing and has a land use designation of Institutional/Public Lands.

3.14.2 Discussion

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

No Impact. A project's potential effects on population would typically be considered significant if it would induce substantial unplanned population growth beyond what is assumed in applicable land use plans, primarily through the introduction of new housing and/or businesses. Significant unplanned population growth impacts could also occur if a project provides infrastructure or service capacity to accommodate levels of growth beyond levels currently included in local or regional plans or policies, such that the growth results in significant impacts on the environment.

The campus is within an existing school property in a built-out, urbanized community. The Proposed Project does not include development of residential or commercial uses and would not include the extension of roads or other infrastructure to previously undeveloped areas. Construction activities would result in the generation of temporary construction jobs. However, the additional jobs are expected to be filled by residents who currently live in the Los Angeles region and would not result in the relocation of any population. The Proposed Project includes improvements to the Will Rogers campus that are intended to accommodate current and future student enrollment in accordance with the District's educational specifications by providing properly sized learning environments. Accordingly, the Proposed Project would not increase student capacity or enrollment at the school. Therefore, the Proposed Project would not induce substantial unplanned population growth in the City of Santa Monica. No impact would occur, and no mitigation is required.

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

No Impact. The land use designation for the campus is Institutional/Public Lands. Project activities would be contained entirely within the Will Rogers campus, which does not contain residential housing. Therefore, the Proposed Project would not displace people or housing and would not require the construction of replacement housing.

Mitigation Measures

The Proposed Project would not result in significant impacts associated with population and housing, and no mitigation measures are required.

3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services.				
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

3.15.1 Environmental Setting

FIRE PROTECTION

The City of Santa Monica Fire Department (SMFD) operates five fire stations throughout the City. The Will Rogers campus is served by Fire Station 5, which is located at 2450 Ashland Avenue, approximately 1.3 roadway miles from the campus. Station 5 has one paramedic engine company, with a crew of four; one aircraft rescue fire fighting vehicle; one reserve engine; one aircraft rescue and firefighting utility; one reserve ladder truck; and three reserve rescue ambulances (SMFD 2021).

POLICE PROTECTION

The Santa Monica Police Department (SMPD) provides police protection services for the City. The SMPD operates out of one main station located at 333 Olympic Boulevard, approximately 1.6 roadway miles from the campus. The campus is within Beat 2, which is a patrol area bounded by Pico Boulevard to the north, Bundy Drive to the east, Dewey Street to the south, and 2nd Street to the west (SMPD 2021). According to the most recent SMPD Biennial Report for 2019 to 2020, the SMPD is comprised of 219 sworn officers and 205 civilian personnel. In 2020, the SMPD responded to 97,000 calls for service (SMPD 2021).

SCHOOLS

The District is a public school district that serves the cities of Santa Monica and Malibu. As of 2021, the District enrolled approximately 9,200 students in Transitional Kindergarten through 12th grade in nine elementary schools, three middle schools, two comprehensive high schools, a continuation high school, a K-8th grade alternative school and Project-Based Learning High School pathway. The District employs approximately 1,400 staff members (District

2021). The John Adams Middle School is the closest school to the campus, which is adjacent to the Will Rogers campus across 16th Street.

PARKS

The City of Santa Monica Community Services Department operates 32 public parks throughout the city. The Community Services Department also offers a public beach, an art practice space, a civic auditorium, four community gardens, a skatepark, a community center, a playhouse, several public playgrounds, and an aquatics center. In addition, the City of Santa Monica and the District established a Playground Partnership that allows the public to use school playgrounds during non-school hours. Public parks and recreational facilities within 0.5 mile of the campus include the following:

- Santa Monica Swim Center: An aquatics center with two open-air pools for recreational and lap swimming. The aquatic center is located approximately 0.2 mile north of the campus.
- Clover Park: A 17-acre park with 95 parking spaces, picnic tables and 16 barbeque grills, two playgrounds, restrooms, one baseball diamond, two softball fields, two soccer fields, two tennis courts, one sand volleyball court, and a fitness course. The park is located approximately 0.7 mile east of the campus.
- Marine Park: A park with 64 parking spaces, two baseball fields, one soccer field, two basketball courts, one handball court, a three tennis courts, a birthday pavilion, picnic tables and barbeque grills, a children's playground, restrooms, and an auditorium. The park is located approximately 0.5 mile south of the campus.

OTHER PUBLIC FACILITIES

The Santa Monica Public Library system includes five branches throughout the City. The Fairview Branch is the closest library, located approximately 0.35 mile east of the campus.

3.15.2 Discussion

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

Fire protection?

No Impact. The proposed campus modernization efforts would not result in an increase in student enrollment or faculty at the campus. As such, the Proposed Project would not increase demand for fire protection services beyond existing conditions. Furthermore, upgrades to existing buildings and construction of one new building would be subject to current fire code and SMFD requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access. Compliance with fire code standards would be ensured through the plan check process and would minimize hazards to life and property in the event of a fire. The Proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives. Therefore, the Proposed Project would have no impact related to fire protection, and no mitigation is required.

Police protection?

No Impact. As stated above, the Proposed Project would not result in an increase in student enrollment or faculty at the Will Rogers campus. Therefore, the Proposed Project would not increase demand for police protection services beyond existing conditions. The Proposed Project would not require the provision of new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. Therefore, the Proposed Project would have no impact related to police protection, and no mitigation is required.

Schools?

No Impact. Although the Proposed Project would result in new and physically altered public school facilities, the proposed improvements would not result in significant impacts on the environment, as evaluated in Sections 3.1 through 3.21 of this IS/Proposed MND. No new or expanded school facilities outside of the Will Rogers campus are proposed.

Furthermore, the Proposed Project does not include development of residential or commercial uses and would not contribute to population growth that would increase the number of school-aged children in the City of Santa Monica. Rather, the Proposed Project is intended to modernize the Will Rogers campus with larger school facilities that would accommodate current and planned future student enrollment in accordance with the District's educational specifications. Accordingly, the Proposed Project would not increase student capacity or enrollment at Will Rogers.

Based on the above discussion, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. Therefore, the Proposed Project would have no impact related to schools and no mitigation is required.

Parks?

No Impact. As stated above, the Proposed Project would not contribute to population growth that would increase the use of parks and recreational facilities in the City of Santa Monica. Existing athletic fields and recreational facilities on the Will Rogers campus would not be affected by the Proposed Project. These facilities would continue to be available for student and community use throughout the duration of construction and operation of the Proposed Project. The Proposed Project would not require the provision of new or physically altered parks and recreational facilities. Therefore, the Proposed Project would have no impact related to parks and no mitigation is required.

Other public facilities?

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

Mitigation Measures

The Proposed Project would not result in significant impacts associated with public services, and no mitigation measures are required.

3.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
Would the project:				
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?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

3.16.1 Environmental Setting

Section 3.15, "Public Services," includes a discussion of parks and recreational facilities within the City of Santa Monica and in the campus vicinity. In addition, the Will Rogers campus contains playfields, courts, and playgrounds in the northern half of the school. Furthermore, synthetic turf football and soccer fields and a baseball diamond are located in the southeast portion of the John Adams Middle School campus along 17th Street and Ocean Park Boulevard, which is located across 16th Street from the Will Rogers campus. These athletic fields are currently available for permit use by the community through the Civic Center Act and joint use agreements with the City of Santa Monica. The fields are typically used by youth and adult sports leagues.

3.16.2 Discussion

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?

No Impact. Population growth in an area can result in an increase in the demand for parks and recreational facilities. The Proposed Project does not include development of land uses that would generate a permanent increase in population, such as residential housing. In addition, the Proposed Project would not include the development of new infrastructure or services that would induce population growth. Rather, the Proposed Project is intended to redevelop the Will Rogers campus with larger facilities that would accommodate current and planned future student enrollment in accordance with the District's educational specifications. The existing athletic fields on the Will Rogers campus that are used by students and the Santa Monica community would not be affected by the Proposed Project. The Proposed Project is not anticipated to increase the use of existing neighborhood and regional parks or other recreational facilities Therefore, the Proposed Project would have no impact related to the deterioration of existing parks and recreational facilities, and no mitigation is required.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. The Proposed Project does not include new recreational facilities. As described in Section 3.16.2(a) above, the Proposed Project would not generate population growth that would increase demand for recreational facilities and necessitate the construction or expansion of recreational facilities. Therefore, the Proposed Project would not result in an adverse physical effect on the environment from the construction of recreational facilities, and there would be no impact.

Mitigation Measures

The Proposed Project would not result in significant impacts associated with recreation, and no mitigation measures are required.

3.17 TRANSPORTATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation.				
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 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?	☐	☐	☒	☐

3.17.1 Environmental Setting

ROADWAY NETWORK

Access to the campus is provided by the surrounding roadway network, which includes Interstate 10 (I-10), State Route (SR) 1, Ocean Park Boulevard, Pearl Street, 16th Street, and 14th Street.

Highways

The following highways are operated and maintained by California Department of Transportation (Caltrans) and provide regional access to the campus:

- **I-10** is an east-west freeway that traverses the southern United States from Santa Monica, California to Jacksonville, Florida. Within California, I-10 connects the major metropolitan areas of Los Angeles, San Bernardino, and Palm Springs. Near the campus, I-10 can be accessed via Cloverfield Boulevard, 20th Street, and Olympic Boulevard interchanges northwest of the campus. The speed limit is assumed to be 65 miles per hour (mph).
- **SR 1**, also known as Lincoln Boulevard in the vicinity of the campus, is a north-south highway that runs along the west coast of California between Orange County and Mendocino County. SR 1 connects to Ocean Park Boulevard which provides access to the campus. The posted speed limit is 35 mph.

Roadways

The following roadways provide access to the campus:

- **Ocean Park Boulevard** is a bidirectional two-lane roadway with a center lane that connects to 14th Street and 16th Street southeast of the campus. The posted speed limit is 30 mph.
- **Pearl Street** is bidirectional northeast/southwest roadway that connects to 14th Street and 16th Street northwest of the campus.
- **Maple Street** is a bidirectional southwest/northeast roadway that extends from 17th Street to 18th Street.

- **16th Steet** is a bidirectional northwest/southeast roadway with one lane in each direction. Access to an existing parking lot on the Will Rogers campus is provided by 16th Street. The posted speed limit is 15 mph.
- **14th Steet** is a bidirectional northwest/southeast roadway with one lane in each direction. Primary access is provided to the campus by 14th Street with student drop-off/pick-up occurring along the roadway. The posted speed limit is 15 mph when children are present. Access to an existing parking lot is proved by 14th Street on the northwest corner of the campus.

BICYCLE AND PEDESTRIAN FACILITIES

The bicycle network in the City of Santa Monica is composed of bike paths, bike lanes, and bike routes. Bicycle facilities are classified in the Santa Monica Land Use and Circulation Element as follows:

- Bicycle Paths (Class I): Bicycle paths are separated from the roadway, generally running through a park or open space.
- Bicycle Lanes (Class II): Bicycle lanes are striped areas of the roadway where bicyclists ride parallel to motor vehicle traffic.
- Bicycle Routes (Class III): Corridors designated as on-street bicycle routes are low-volume, low-speed streets. These streets should have way-finding signs and markings in the travel lane such as Shared-Use Arrows, known as "sharrows," to indicate to all users that bicyclists are expected to share the travel lanes (City of Santa Monica 2010: 4.0-36).

As of 2020, the City of Santa Monica had 20 lane miles of bike paths or protected bike lanes and off-street paths, 61 lane miles of bike lanes, and 55 lane miles of bike boulevards and routes (City of Santa Monica 2020a: 12). In the vicinity of the campus, Class II bike lanes and sidewalks exist on Ocean Park Boulevard, Pearl Street, 16th Street (north side), and 14th Street (south side). There are sidewalks along each of the roadways surrounding to the campus. Pedestrian facilities are set back from the roadway, separated by landscaping, and are approximately 5 feet wide. A description of existing bicycle facilities on the surrounding roadway system is provided below.

- **Ocean Park Boulevard:** Class II bicycle lanes and pedestrian facilities are present on each side of the roadway.
- **Pearl Street:** Class II bicycle lanes and pedestrian facilities are present on each side of the roadway.
- **Maple Street:** There are no bicycle facilities provided on Maple Street. Pedestrian facilities are present on each side of the roadway. A continental crosswalk exists on 17th Street at its intersection with Maple Street (northwest side).
- **16th Steet:** A Class II bicycle lane is present on the northeast side of 16th Street. The Class II bicycle lane is painted green from Ocean Park Boulevard to Pico Boulevard. Pedestrian facilities are present on each side of the roadway. Speed humps and bollards are provided in the vicinity of the campus along 16th Street. Additionally, a midblock crossing with a rapid flashing beacon for pedestrian warning is located near the main entrance of John Adams Middles School located across the street from the campus.
- **14th Street:** A Class II bicycle lane is present on the southwest side and a Class III bike route on the northeast side of 16th Street. The Class II bicycle lane is painted green at potential points of conflict. Pedestrian facilities are present on each side of the roadway. Continental crosswalks are located on the southwest and southeast side of the 14th Street and Pine Street intersection near the main campus entrance.

UC Berkeley maintains a Transportation Injury Mapping System (TIMS). In the 5-year period from January 1, 2015 through December 31, 2020, there were seven collisions involving a pedestrian and four collisions involving a bicyclist within 0.25-mile of the Will Rogers campus between the hours of 6:00 a.m. and 7:00 p.m. Monday through Friday (UC Berkeley 2022). These parameters were used in this analysis to account for typical school operating hours, including before and after school programs or other events, when the school would generate activity along the transportation network surrounding the Will Rogers Campus. Between 2015 and 2020, there were no collisions involving persons under

18 years old who were walking or bicycling based on the parameters detailed above; thus, no Will Rogers students were victims in the crashes identified. Additionally, none of the collisions resulted in fatalities (UC Berkeley 2022).

The City of Santa Monica approved and completed various Safe Routes to School pedestrian improvements for John Adams and Lincoln Middle Schools, Roosevelt Elementary School, and Will Rogers Learning Community (City of Santa Monica n.d.). General improvements adjacent to John Adams Middle School and Will Rogers Learning Community included increased safety around drop-off and pick-up zones, new pavement markings and signage, and upgraded ramps where needed to meet American with Disabilities Act (ADA) compliance. Detailed improvements by location are included below.

- **Pearl Street and 17th Street**: Enhanced loading zone signage
- **Pearl Street and 16th Street**: Added curb extensions
- **16th Street between Pearl Street and Ocean Boulevard:** Added double yellow centerline, added barrier using flex post, added signage to restrict U-Turns
- **Pearl Street and 14th Street**: Added Curb extensions
- **14th Street and Pine Street**: Added cub extensions; lengthened time for loading
- **Ocean Park Boulevard and 16th Street**: Upgraded existing pedestrian beacon with Rapid Rectangular Flashing Beacon
- **17th street and Ocean Park Boulevard:** Extended bicycle lane up to intersection with green markings, added bicycle box, added signage for No Right Turn on Red

Additional improvements implemented for Ocean Park Boulevard and 16th Street included restricting vehicle movements to reduce conflict points; adding signage; retroreflective pavement markers and green bicycle crossing markings; adding new street striping to enhance visibility; and implementing a new pedestrian Rectangular Rapid Flashing Beacon to alert drivers to yield and allow pedestrians to safely cross (City of Santa Monica n.d.). The City of Santa Monica has planned, funded, and constructed the pedestrian improvements identified above for the purpose of providing safe travel to and from the Will Rogers campus, and the crashes on the surrounding roadway network over the 5-year period do not show a pattern of collisions related to school activities. None of the collisions involved youth, and only two of the intersections experienced more than one collision (i.e., Ocean Park Boulevard and 18th Street and Pearl Street and 16th Street).

TRANSIT SYSTEM

The Big Blue Bus (BBB) provides fixed route bus service in the City of Santa Monica. The closest stops to the campus are approximately 500 feet south at Ocean Park Boulevard and 14th Street. Route 8 serves the Ocean Park Boulevard and 14th Street stops and provides service between the UCLA Hilgard Terminal and Downtown Santa Monica Metro Station including the Westwood Metro Station and Santa Monica Municipal Airport. Route 8 operates from approximately 6:30 a.m. to 10:30 p.m. everyday. BBB and WISE and Healthy Aging partnered with Lyft to provide curb-to-curb transportation through its Mobility On Demand Every Day (MODE) Program. Eligible Santa Monica residents, age 65 and older, and disabled residents 18 and older, can use the shared ride service for any transportation purpose within city limits.

The Los Angeles County Metropolitan Transportation Authority (Metro) E Line provides light rail service from Downtown Santa Monica to Downtown Los Angeles. The 17th Street/SMC Station is located approximately one mile northwest of the campus. Headways for the E Line range between approximately 10 and 20 minutes depending on the time of day.

The District Board of Education approved the LA Metro Fareless System Initiative (FSI) for student riders in November 2021. The main goal of the program is to reduce the number of student and family vehicles driving to District schools by promoting alternative modes of transportation. The program provides free rides on Metro and BBB to and from school and for trips after school and on weekends.

APPLICABLE PLANS AND REGULATIONS

Senate Bill 743

SB 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA guidelines that address transportation metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

These updates indicated that vehicle miles traveled (VMT) would be the primary metric used to identify transportation impacts. State CEQA Guidelines Section 15064.3 was added on December 28, 2018, to address the determination of significance for transportation impacts, which requires VMT as the basis of transportation analysis instead of congestion (such as LOS). The updated State CEQA Guidelines were approved and lead agencies had an opt-in period until July 1, 2020 to implement the updated guidelines regarding VMT. As of July 1, 2020, implementation of Section 15064.3 of the updated CEQA Guidelines apply statewide.

State CEQA Guidelines Section 15064.3(b) identifies criteria for analyzing the transportation impacts of a project. Section 15064.3(b)(1) addresses land use projects and states that projects with specified proximity (i.e., 0.5-mile or less) to "major" or "high quality" transit should be presumed to cause a less-than-significant transportation impact. Additionally, Section 15064.3(b)(1) also states that projects resulting in a decrease in VMT in the project area as compared to existing conditions should also be presumed to have a less than significant effect. Section 15064.3(b)(3), "Qualitative Analysis," explains that there may be conditions under which a qualitative rather than quantitative analysis of VMT is appropriate. This section states that if existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may qualitatively analyze VMT generated by a project. Additionally, this section notes that for many projects, a qualitative analysis of construction traffic may be appropriate. Section 15064.3(b)(4), "Methodology," explains that the lead agency has discretion to choose the most appropriate methodology to evaluate VMT, subject to other applicable standards such as CEQA Guidelines Section 15151 (standards of adequacy for EIR analyses).

In December 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), which provides guidance related to VMT analysis. The 2018 Technical Advisory provides guidance related to screening thresholds for small projects that indicate when detailed analysis is needed or if a project can be presumed to result in a less-than-significant VMT impact. The Technical Advisory notes that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact, absent substantial evidence indicating otherwise (OPR 2018).

City of Santa Monica VMT Screening Criteria and Significance Thresholds

The City of Santa Monica adopted the VMT screening criteria and significance thresholds in 2020 to provide guidance on analyzing the VMT impacts of development projects. The City's VMT screening criteria and significance thresholds includes a tiered method for determining land use projects that do not require a detailed VMT analysis. Thus, projects that meet the VMT screening criteria can be assumed to result in a less than significant impact and no further VMT analysis is necessary. Tier 1 of the screening criteria (City of Santa Monica 2020b) for land use projects is detailed below.

- 200 residential dwelling units or less.
- 100 percent affordable housing.
- 50,000 square feet or less of commercial floor area by land use type.
- New construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) provided that there would be no student enrollment increase or if student enrollment is increased, 75 percent of the student body comes from within 2 miles of the school.

- Expansions of civic/government use (such as fire and police stations) and utility facilities less than 50,000 square feet or replacement of such uses/facilities (in same or another location) to serve the community, or if larger than 50,000 square feet, the project would not result in more than 50 net new additional full time equivalent employees.
- Local serving Parks and Recreational facilities, as determined by City Staff.
- If a project meets one of the above screening criteria, the project is presumed to result in a less than significant impact and no further analysis is required.

Division of the State Architect

The Division of the State Architect (DSA) provides design and construction oversight for K–12 schools, community colleges, and various other state-owned and state-leased facilities to ensure that they comply with all structural, accessibility, and fire and life safety codes. DSA also develops accessibility, structural safety, and historical building codes and standards utilized in various public and private buildings throughout the State of California. Bulletins, Guidelines, Interpretations of Regulations, Policies, and Procedures are developed, approved, and published by DSA Headquarters to provide guidelines on acceptable means of achieving compliance with Building Regulations and Standards, and for the purpose of promoting consistent enforcement of code requirements among the DSA Regional Offices.

California Green Building Standards Code (CALGreen)

The California Green Building Standards Code (Part 11, Title 24, California Code of Regulations) known as CALGreen, is the first-in-the-nation mandatory green building standards code. In 2007, California Building Standards Commission (CBSC) developed green building standards in an effort to meet the goals of Assembly Bill 32, which established a comprehensive program of cost-effective reductions of greenhouse gases to 1990 levels by 2020.

CBSC has the authority to propose CALGreen standards for nonresidential structures that include new buildings or portions of new buildings, additions and alterations, and all occupancies where no other state agency has the authority to adopt green building standards applicable to those occupancies. The following CALGreen policies (CBSC 2022) apply to the Proposed Project:

- 5.106.4 Bicycle Parking

  For buildings within the authority of the Division of the State Architect pursuant to Section 105, comply with Section 5.106.4.2.

- **5.106.4.2** For public schools and community colleges, comply with Sections 5.106.4.2.1 and 5.106.4.2.2.
- **5.106.4.2.1 Student bicycle parking:** Provide permanently anchored bicycle racks conveniently accessed with a minimum of four two-bike capacity racks per new building.
- **5.106.4.2.2 Staff bicycle parking:** Provide permanent, secure bicycle parking conveniently accessed with a minimum of two staff bicycle parking spaces per new building. Acceptable bicycle parking facilities shall be convenient from the street or staff parking area and shall meet one of the following:
  - Covered, lockable enclosers with permanently anchored racks for bicycles;
  - Lockable bicycle rooms with permanently anchored racks; or
  - Lockable, permanently anchored bicycle lockers.

City of Santa Monica General Plan

The Land Use and Circulation Element of the City of Santa Monica General Plan provides goals and policies regarding the transportation network in the City. The policies within the General Plan (City of Santa Monica 2017) relevant to the Proposed Project are provided below:

- **T1.1** Support public health by promoting active living and supporting walking and safe bike routes throughout the city.

- T1.2 Seek to minimize emergency vehicle response time while preventing excessive speed by general traffic.
- T4.1 Manage the City's transportation system to meet overall CO_2 and VMT reduction goals.
- T5.5 Prioritize property access from transit, walking, and bicycling over auto access.
- T7.1 Prioritize implementation of pedestrian safety improvements around community facilities and popular locations.
- T9.7 Partner with the Santa Monica-Malibu Unified School Districts (SMMUSD) and Santa Monica College to promote cycling and bicycle access.
- T10.4 Coordinate with the SMMUSD to identify safe cycling routes to each of its schools.
- T13.7 Improve bus facilities adjacent to new development; improvement could include new bus shelter, wider sidewalks, concrete bus pads, benches, changeable message signs, secure bike parking, trash receptacles, and where applicable, striping and signs for bus lanes and signal priority installation.
- T14.2 Encourage all schools and major employers to provide prepaid access on the BBB and Metro systems for all of their students and employees.
- T25.1 Require 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.

City of Santa Monica Municipal Code

Chapter 7.06 of the Municipal Code pertains to right-of-way management regulations including the requirement to maintain safe crossings for vehicular traffic and to ensure compliance with paths of travel for disabled persons, including crossings for pedestrians at intervals of not more than 600 feet. Chapter 8.40 contains the California Fire Code, adopted by reference, and amendments made by the City. The California Fire Code provides driveway width requirements and minimum dimensions for emergency vehicles to maneuver the transportation network including internal circulation standards.

City of Santa Monica Procedures and Requirements for Temporary Traffic Control Plans

The City of Santa Monica's Procedures and Requirements for Temporary Traffic Control Plans document serves as a guide and contains information regarding when temporary traffic control plans (TTCPs) must be submitted to the City for approval as well as plan preparation requirements (City of Santa Monica 2022).

DISTRICT INITIATED PROGRAMS

Collaborative for High Performance Schools

The Collaborative for High Performance Schools (CHPS) is a 501(c)(3) nonprofit that provides technical resources for school design, construction, operations and maintenance standards through its extensive design criteria programs and project reviewers. CHPS provides resources to schools, school districts, and professionals about all aspects of high-performance school design, construction, and operation. CHPS develops tools that help make schools energy, water, and material efficient, well-lit, thermally comfortable, acoustically sound, safe, healthy, and easy to operate. These resources include a well-respected six-volume best practices manual, training and conferences, a high-performance building rating and recognition program, and other tools for creating healthy, green schools. The following CHPS policies (CHPS 2021) apply to the Proposed Project:

- Bicycle Parking:
  - SS P6.0: Comply with CALGreen Section 5.106.4.2.
- Human-Powered Transportation
  - SS C6.1.1 Bicycle Accommodation: Provide sidewalks or walkways, and bike lanes that extend at least from the school entrance to the end of the school property. Provide suitable means for the short-term securing of

bicycles and scooters outside the school and for skates, skateboards and helmets indoors (including lockers and/or cabinets). The storage must be safe, convenient, and at accessible locations at the following ratio: Grades 4-12: 1.5 spaces for every 10 students planned capacity (2 spaces minimum).

- SS C6.1.2 Community Bike Lanes: In addition to requirements of 9.1.1, collaborate with local organizations and the municipality to provide safe bike lanes that extend appropriately from the school site at least one mile into neighboring communities or access ways.
- SS C6.1.3 Walking School Bus/Safe Routes to School: For elementary schools that also comply with SS C5.1 Central Location, provide an active Safe Routes to School Program involving parents, students, school and city traffic officers and transportation planners. Program can include walking school buses, bike trains, bike and walk skills training, bike helmet promotion and other active transportation encouragement events.

3.17.2 Discussion

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

Less-than-significant Impact. Implementation of the Proposed Project would not require the construction, re-design, or alteration of any public roadways other than the construction of a new driveway along 16th Street that would allow access to a new parking lot. Thus, 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. Moreover, the Proposed Project would not alter the current travel patterns or pedestrian activity already experienced and planned for under existing conditions.

Bike parking currently exists at multiple locations across the campus including in front of the school along 14th Street and is also centrally located near the school's existing parking lot. The Proposed Project would construct a new through parking lot that connects 14th Street and 16th Street, with vehicle entrances and exits at each street and a vehicle turnaround in the center that would accommodate an internal drop-off and pickup area. The existing asphalt lot at the corner of 16th Street and Maple Street would be used for staff and overflow event parking. By providing the new internal drop-off and pick-up areas, the Proposed Project is consistent with City General Plan Policy T25.1, which encourages schools to provide adequate loading areas. Further, the Proposed Project is consistent with General Plan Policies T1.1 and T4.1, which promotes the use of alternative modes of transportation, by providing secure bicycle parking on-site for students and staff. New bicycle parking and lockers would be provided internally to comply with CalGreen requirements and CHPS criteria. Therefore, the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing transit, bicycle, and pedestrian facilities and the impact would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less-than-significant Impact. The VMT generated from construction and operation of the Proposed Project is discussed below.

Construction

The VMT of construction workers is not newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites in which workers travel to each day. Therefore, construction workers are not generating new trips each day, only redistributing them. Additionally, Proposed Project construction activities would be temporary and intermittent in nature occurring in four phases between June 2023 and December 2030; and thus, would not result in long-term increases in vehicular trips. Construction of Phase 1 of the Proposed Project would require the highest number of construction personnel resulting in an estimated 89 daily trips (See Appendix A for detailed air quality and greenhouse gas emission modeling and methodology). Thus, trips associated with the commute of construction personnel would not exceed the OPR Technical Advisory screening criteria for small projects (i.e., 110 new daily trips). Therefore, construction activities are not expected to significantly increase VMT in the region, and the VMT impact related to construction would be less than significant.

Operations

The Proposed Project would remove and demolish existing classrooms, construct new buildings, and reconfigure outdoor areas, parking lots, and play areas. As detailed in Chapter 2, "Project Description," the Proposed Project would not increase the school's capacity or change its attendance boundaries. Therefore, the Proposed Project would fall under the first tier of the City's VMT screening criteria for land use projects. Per the City's VMT screening criteria and significance thresholds, construction of new educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas) are presumed to result in a less than significant VMT impact provided that there would be no student enrollment increase or, if student enrollment is increased, at least 75 percent of the student body would come from within 2 miles of the school. The Proposed Project meets this criterion, and therefore is presumed to result in a less than significant VMT impact. Additionally, because the Proposed Project is a redevelopment project that would not increase student enrollment or capacity, the number of daily operational trips is not expected to increase as a result of the Proposed Project's implementation. Therefore, the Proposed Project would also meet OPR's Technical Advisory screening criteria for small projects because it would generate less than 110 new daily trips.

For the reasons detailed above, the Proposed Project would not significantly increase VMT in the region. Therefore, the impact related to operational VMT would be less than significant.

Summary

Construction worker VMT is redistributed throughout the transportation network depending on the worksite, and therefore is not newly generated. Additionally, the Proposed Project meets the screening criteria for educational facilities based on the City's VMT screening criteria and significance thresholds, as well as the screening criteria for small projects as established by the OPR Technical Advisory. Therefore, the Proposed Project is presumed to result in a less than significant VMT impact and would not conflict or be inconsistent with CEQA Guidelines section 15064.3(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)?

Less than Significant with Mitigation Incorporated. The Proposed Project's impacts related to transportation hazards during construction and operation are detailed below.

Construction

The Proposed Project would involve four phases of construction taking place between June 2023 and December 2030. As detailed in Chapter 2, "Project Description," construction activities would involve demolition, building construction, site preparation, grading, and architectural coating. Construction staging would remain within the campus. The Proposed Project's construction is anticipated to occur between the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday, which is consistent with the Santa Monica Municipal Code Section 4.12.1.110. However, the District may obtain a waiver from the City to allow construction between 7:00 a.m. and 5:00 p.m. to improve safety and congestion, allowing the contractor to arrive and begin work prior to major drop-off of students.

Construction activities would require the hauling of heavy equipment (e.g., bulldozers, excavators, etc.) and operation of large trucks on the surrounding roadway network. Some of the roadways surrounding the campus (e.g., 16th Street, 14th Street, and Maple Street) have limited lane width and sharp curves at intersections. Haul trips and equipment deliveries often use large trucks, which may temporarily cause hazards on these roadways during delivery and removal. For example, a large truck traveling in one direction on 14th Street may preclude traffic from traveling in the opposite direction. Because the number of trips in the immediate vicinity of the campus increases during school pickup and drop off times, potential safety hazards could worsen if construction related haul trips were to occur during these times of higher traffic levels. Additionally, if Proposed Project-related haul trips and the operation of heavy vehicles were to occur along roadways with constrained right-of-way, project-related construction activities could potentially result in an increase in roadway hazards due to incompatible uses. Construction may also require temporary closures of the public right-of-way adjacent to the campus or increase safety hazards due to construction vehicles entering and exiting the site (e.g., for delivery of building materials). Finally, the Proposed Project involves the

construction of a new driveway on 16th Street, which would temporarily affect sidewalk usage and access during its construction. Therefore, this impact would be potentially significant.

The implementation of mitigation measure **MM-TRAN-1** would require the construction contractor to prepare and implement a TTCP to address safety hazards, including but not limited to avoidance of construction staging and delivery during off-peak pick-up/drop-off times, which would reduce the temporary impact. Additionally, construction traffic impacts would be localized and temporary and would not introduce a permanent hazardous condition to the local roadways. For these reasons, with the implementation of mitigation measure **MM-TRAN-1**, the Proposed Project would not substantially increase hazards due to a design feature or incompatible use. Impacts would be less than significant with mitigation incorporated.

Operations

As detailed in the "Applicable Plans and Regulations" section above, DSA oversees the design and construction of K-12 schools; thus, the Proposed Project would be required to meet the design and safety standards set forth by DSA including the provisions detailed in the California Code of Regulations, Title 24. The Proposed Project would be required to meet California Building Code requirements as established in DSA Interpretation of Regulations 11B-10 pertaining to *Scoping and Path of Travel Upgrade Requirements for Facility Alteration, Addition and Structural Repair Projects* (DSA 2017). DSA reviews project plans for public K–12 schools, community colleges and certain other state funded building projects to ensure that plans, specifications, and construction comply with California's building codes (Title 24 of the California Code of Regulations). As such, the Proposed Project would be subject to DSA plan review thereby ensuring the proposed design and internal circulation would meet all applicable regulations.

Additionally, implementation of the Proposed Project would not require the construction, re-design, or alteration of any public roadways (other than the construction of a new driveway along 16th Street) and the types of vehicles accessing the campus during operational activities would be consistent with existing conditions (i.e., passenger vehicles and buses).

The Proposed Project would be consistent with all City design and safety standards including those set forth in the Municipal Code. Article 7 of the Municipal Code pertains to public works. Specifically, Section Chapter 7.04 establishes the standards required for street improvements, including Section 7.04.180 which address driveways from public streets into private property. Further, Section 7.06.340 addresses construction requirements including vehicle and pedestrian crossing safety as detailed in the "Applicable Plans and Regulations" section above. Municipal Code Chapter 9.28 details the standards for parking, loading, and circulation including access and dimension requirements. Pedestrian and bicyclist safety and circulation is also addressed in this section of the Municipal Code to ensure sight distances, sidewalk width requirements, and other access standards are met.

However, the Proposed Project involves the construction of a new parking lot in the northern portion of the campus that would include a new driveway along 16th Street. An existing crosswalk is located directly adjacent to where the driveway is proposed that provides pedestrian access across 16th Street to the sidewalk in front of John Adams Middle School. As such, the location of the proposed new driveway would conflict with the existing pedestrian right-of-way, resulting in a potential safety hazard. For this reason, the Proposed Project would substantially increase hazards during operations and the impact would be potentially significant.

Mitigation measure **MM-HAZ-3** (as detailed in Section 3.9) would require the District to coordinate with the City to relocate the existing crosswalk on 16th Street located near the campus' northeastern boundary. The implementation of mitigation measure **MM-HAZ-3** would ensure that all permits are obtained, and design standards are met to minimize safety hazards for people utilizing the new crosswalk. Alternatively, the District may redesign the Proposed Project such that the proposed new driveway does not conflict with the existing crosswalk on 16th Street. For these reasons, with the implementation of mitigation measure **MM-HAZ-3**, the Proposed Project would not substantially increase hazards due to a design feature or incompatible use. Impacts would be less than significant with mitigation incorporated.

Summary

The Proposed Project is subject to review by DSA to ensure the Proposed Project meets all applicable policies, standards, and regulations pertaining to access and circulation during operations. Additionally, the Proposed Project would not alter any existing public roadways other than constructing a new driveway along 16th Street where a new parking lot is proposed. The Proposed Project would be consistent with City regulations during construction to maintain safety and minimize hazards during construction; however, the movement of heavy vehicles on the surrounding roadway and potential closure of portions of the public right-of-way may diminish the environment for people walking, bicycling, and/or driving in the area. Additionally, the proposed new driveway on 16th Street along the northeastern portion of the campus would conflict with the pedestrian crosswalk that currently exists on 16th Street. However, for the reasons described above, the implementation of mitigation measures MM-TRAN-1 and MM-HAZ-3 (as detailed in Section 3.9) would reduce these potentially significant impacts. With the implementation of mitigation measures MM-TRAN-1 and MM-HAZ-3, the Proposed Project would not substantially increase hazards due to a design feature or incompatible use. Impacts would be less than significant with mitigation incorporated.

d) Result in inadequate emergency access?

Less-than-significant Impact. As detailed in Section 3.17.3(c) above, the Proposed Project would be subject to review by DSA who oversees design and construction for K–12 schools. The Proposed Project would also be required to comply with all design standards established by DSA including Policy 07-03, "Fire Department and Emergency Access Roadways and School Drop-Off Areas." The purpose of this policy is to establish requirements based on State Fire Marshal Regulations contained in Titles 19 and 24 of the California Code of Regulations, and the California Vehicle Code for fire and emergency access roadways on public school or community college campuses, including fire and emergency access roadways combined with student drop-off and pick-up areas. Additionally, implementation of the Proposed Project would not require the construction, re-design, or alteration of any public roadways; thus, existing emergency access would be maintained.

The City of Santa Monica has adopted the California Fire Code (Municipal Code Section 8.40.010). Appendix D of the 2019 California Fire Code specifies regulations for fire apparatus access roads, which the Proposed Project would be required to conform to. Therefore, adequate emergency access would be provided to the campus and the impact would be less than significant.

Mitigation Measures

MM-TRAN-1: Preparation and Implementation of a Construction Management Plan

Santa Monica Municipal Code (SMMC) Section 8.98 stipulates the preparation of a Construction Management Plan for any project that meets the criteria set forth in SMMC Section 8.98.030 in order to coordinate, communicate, and manage the temporary effects of construction activity on surrounding residents, businesses, and commuters in the community. In accordance with SMMC Section 8.98, prior to initiating construction, the District and/or its contractors shall prepare and implement a Construction Management Plan that meets the requirements of SMMC Section 8.98.040 (Content of a Construction Management Plan). The Construction Management Plan shall also 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 will 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 oversize 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 they 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 assist in educating parents, students, and staff on drop-off/pick-up procedures specific to each phase of construction that includes informational materials regarding student drop-off and pick-up 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.

Additionally, 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.

MM-HAZ-3: Relocate the Existing Crosswalk on 16th Street

Implement **MM-HAZ-3** as detailed in Section 3.9, above.

3.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
Has a California Native American Tribe requested consultation in accordance with Public Resources Code section 21080.3.1(b)?	☐ Yes		☒ No	
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)?	☐	☐	☐	☒
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

3.18.1 Environmental Setting

In accordance with Assembly Bill (AB) 52 and PRC section 21080.3.1, the District sent formal notification letters of the Proposed Project, dated June 21, 2022, to two Native American tribes that have requested notification from the District: the Gabrieleño Band of Mission Indians – Kizh Nation and the Torres Martinez Desert Cahuilla Indians. Neither tribe requested consultation, therefore, no known resources within the campus area were identified as tribal cultural resources as defined in PRC section 21074.

3.18.2 Discussion

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)?

No impact. The campus contains no tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources (SCCIC File No. 23790.9956). Therefore, there would be no impact.

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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less-than-significant Impact. No tribes requested consultation pursuant to PRC section 21074, and no tribal cultural resources have been identified in the campus area. As such, it is not anticipated that tribal cultural resources would be encountered during construction-related ground disturbing activities. This impact is less than significant and no mitigation measures are required.

Mitigation Measures

The Proposed Project would not result in significant impacts associated with tribal cultural resources and no mitigation measures are required.

3.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems.				
Would the project:				
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have insufficient 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 inadequate 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) Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

3.19.1 Environmental Setting

WATER

The Santa Monica Public Works Department, Water Resources Division is the water service provider for the City. The City prepared an Urban Water Management Plan (UWMP) in 2020, which analyzes past, current, and future water demands and the reliability of water supplies within the City. According to the UWMP, approximately 65 percent of the City's water supply from 2016 to 2020 came from local sources, including groundwater from the Santa Monica Groundwater Basin and approximately 35 percent of the water supply came from imported water supplies from the Metropolitan Water District of Southern California (MWD). As detailed in the UWMP, the City has implemented conservation measures to offset water demand increases typical of population growth, including the City's Water Neutrality Ordinance. To ensure water service reliability, the City identifies future projects and programs at the local level to enhance the reliability and resiliency of the City's water supply in its most recent Sustainable Water Master Plan. These projects and programs include increasing water conservation efforts, developing alternative water supplies (e.g., increasing recycled water), and expanding local groundwater production within sustainable yield limits. With implementation of these projects and programs, the UWMP demonstrates that the City will be able to maintain

adequate water supplies to meet projected water demand through 2040, including during normal years, single dry years, and consecutive dry years (City of Santa Monica 2021b).

According to the Districtwide Plan for Sustainability, annual water consumption at Will Rogers during the 2017-2018 fiscal year was 2,162,240 gallons (District 2019).

WASTEWATER

The Santa Monica Public Works Department, Water Resources Division operates a municipal sewer system, which is subject to the wastewater treatment requirements adopted by the Los Angeles RWQCB and other state and federal regulations. Wastewater generated at the JAMS campus is treated at the Hyperion Water Reclamation Plant, which ultimately discharges into the Pacific Ocean. The Hyperion Water Reclamation Plant is required to comply with state-mandated Waste Discharge Requirements (WDR). WDRs establish the levels of pollutants allowable in water discharged from a facility. Compliance with applicable WDRs is monitored and enforced by the City of Los Angeles Sanitation, which ensures that treated effluent meets all federal, state, and local water quality standards.

ELECTRICITY AND NATURAL GAS

Southern California Edison provides electricity and Southern California Gas provides natural gas to the City of Santa Monica. According to the Districtwide Plan for Sustainability, total electricity consumption was 262,013 kilowatt hours (kWh) and total natural gas consumption was 5,370 therms at Will Rogers for the 2017-2018 fiscal year (District 2019).

TELECOMMUNICATIONS

Frontier Communications and Spectrum provide telecommunications services to the City of Santa Monica.

SOLID WASTE

The City of Santa Monica provides trash collection and recycling services within the City. Table 3.19-1 includes a summary of the closest active and permitted landfills to the campus.

Table 3.19-2 Nearby Landfills

Landfill	Operator	Address	Distance to the Campus	Maximum Permitted Capacity	Remaining Capacity	Anticipated Closure Date
Calabasas Landfill	County of Los Angeles Sanitation District	5300 Lost Hills Road, Agoura, CA 91301	16.6 miles	69,300,000 cubic yards	14,500,000 cubic yards	1/1/2029
Scholl Canyon Landfill	County of Los Angeles Sanitation District	3001 Scholl Canyon Road, Glendale, CA 91206	18.7 miles	58,900,000 cubic yards	9,900,000 cubic yards	4/1/2030

Source: Compiled from the CalRecycle Solid Waste Information System in 2022.

According to the Districtwide Plan for Sustainability, approximately 204,320 total pounds of waste was produced at the Will Rogers campus during the 2017-2018 fiscal year, including 169,403 pounds of solid waste (i.e., landfill waste), 25,097 pounds of recycle waste, and 9,820 pounds of green waste. The diversion rate (i.e., the percent of waste not sent to the landfill) at Will Rogers for the 2017-2018 fiscal year was approximately 17.1 percent.

3.19.2 Discussion

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

Less-than-significant Impact. Construction of the Proposed Project would require the consumption of water for activities such as cleaning surfaces, mixing concrete, and suppressing dust, as well as electricity and natural gas to power equipment and vehicles. Water and energy usage would be relatively minor, limited to the construction periods, and would be served by existing utility service providers. Any wastewater generated from construction activities, such as water containing diesel and oil, paint, solvents, cleaners, chemicals, and debris would be collected, screened, and discharged in accordance with the SWPPP. Any remaining waste would be discharged in accordance with wastewater and solid waste disposal regulations. The wastewater treatment provider that serves the campus area has adequate capacity to serve the construction needs of the Proposed Project.

Once operational, the Proposed Project would not result in an increase in student capacity or faculty at the Will Rogers campus. Additionally, the Proposed Project would not require the relocation or construction of new or expanded utilities beyond the connections within the campus to the existing utility service lines. For the most part, the Proposed Project would reduce water and energy consumption compared to existing conditions, as many of the buildings undergoing renovation are many decades old and were built consistent with older (or non-existent) building standards. The Proposed Project would be designed to meet the most current Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Energy Code) and exceed the District's CHPS minimum criteria by 25 percent. Buildings would either be equipped with solar panels or would receive a higher tier of sustainable energy supplies to ensure a similar reduction in the use of fossil fuels. New lighting and HVAC units would meet or exceed Title 24 standards. High efficiency plumbing fixtures, including faucet aerators and showerheads, would also be installed in the proposed new buildings. Landscaping would consist of drought-tolerant and native plants that support local biodiversity and minimize water use. Refer to Section 3.6, "Energy" for additional information. Additionally, the Proposed Project would not increase student capacity or faculty on the campus, and therefore would not increase the demand for utilities compared to existing conditions. Therefore, the Proposed Project would not require the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities.

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

Less-than-significant Impact. Construction activities would result in a temporary increase in water consumption for cleaning surfaces, mixing with concrete or other materials, suppressing dust, and establishing plants. The relatively minor water supply needed for proposed construction activities would leave sufficient water supplies available for other reasonably foreseeable future development during normal, dry, and multiple dry years.

Once operational, the Proposed Project would not result in an increase in student enrollment or faculty at the Will Rogers campus. As discussed in Section 3.19.2(a), the Proposed Project would not increase demands for water usage at the campus compared to existing conditions because it would not increase the student capacity or faculty at the campus. In addition, the Proposed Project would be designed to meet the water conservation requirements of the most current Building Energy Efficiency Standards (Title 24, Parts 6 and 11 of the California Energy Code). The Proposed Project would also incorporate design considerations to improve water efficiency to help meet or exceed the District's CHPS minimum criteria by 25 percent. High efficiency plumbing fixtures would be installed in the new and renovated facilities. Landscaping would also consist of drought-tolerant and native plants that minimize water use. Furthermore, the City's latest UWMP demonstrates that the City will be able to maintain adequate water supplies to meet projected water demand through 2040, including during normal years, single dry years, and consecutive dry years (City of Santa Monica 2021b). Therefore, impacts related to water supplies would be less than significant, and no mitigation is required.

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

Less-than-significant Impact. Construction activities would result in temporary wastewater generation. However, wastewater generation would be minimal, and the existing wastewater treatment provider would have adequate capacity to serve the Proposed Project's demand during construction. Once operational, the Proposed Project would not result in an increase in student capacity or faculty at the Will Rogers campus. Therefore, the Proposed Project would not result in a permanent increase in the amount of wastewater generated at the campus or in the demand for wastewater treatment services. Therefore, impacts related to wastewater treatment would be less than significant, and no mitigation Is required.

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

Less-than-significant Impact. The Proposed Project's construction would include the removal of existing pavement, building materials, soils, and other debris, which would temporarily increase generation of solid waste. As shown in Table 2-2, construction of the Proposed Project would generate a total of approximately 25,900 cubic yards of solid waste.

As described in the Districtwide Plan for Sustainability, the District manages construction and demolition waste using waste prevention and diversion principles that exceed California Green Building Standards Code (CalGreen) waste diversion requirements. The District's Construction Waste Management and Disposal specifications require that all projects develop a waste management plan to identify strategies for reusing, salvaging, or disposing of non-hazardous waste materials generated during construction and demolition activities. Projects generating construction and demolition waste must collect and separate the waste, track and report on all waste generated, and recycle or salvage a minimum of 75 percent of the waste. This policy is intended to prioritize material recovery and re-use waste management strategies and minimize the disposal of construction and demolition waste in landfills (District 2019). Additionally, hazardous materials would be characterized and disposed of in accordance with applicable regulations, including the Resource Conservation and Recovery Act. The remaining solid waste would be sent to existing nearby landfills. As shown in Table 3.19-1, the Calabasas Landfill and Scholl Canyon Landfill would have sufficient remaining capacity to accommodate the solid waste generated from the Proposed Project's construction.

The Proposed Project would not increase enrollment at the Will Rogers campus and would not contribute to population growth in the surrounding area. As such, the amount of solid waste generated during project operation would be similar to existing conditions. In addition, the Will Rogers campus would continue to implement strategies to minimize waste production and landfill disposal from daily campus operations, as identified in the Districtwide Plan for Sustainability (District 2019). Therefore, the Proposed Project would not 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. Impacts related to the generation of solid waste would be less than significant, and no mitigation is required.

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

No Impact. As discussed in Section 3.19.2(d), solid waste generated during the Proposed Project's construction would be disposed in compliance with federal, state, and local statutes and regulations pertaining to the safe handling, transport, and disposal of solid waste. Applicable regulations include CalGreen, RCRA, and the District's Construction Waste Management and Disposal specifications. Once operational, the Proposed Project would generate solid waste in compliance with applicable regulations in a manner that is similar to existing conditions. Therefore, the Proposed Project would have no impact related to compliance with solid waste reduction statutes and regulations, and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts associated with utilities and service systems and no mitigation measures are required.

3.20 WILDFIRE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?		☐ Yes		☒ No
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 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?	☐	☐	☐	☒

3.20.1 Environmental Setting

According to CAL FIRE, the City of Santa Monica, including the campus, is within a local responsibility area designated as a non-VHFHSZ (CAL FIRE 2011).

3.20.2 Discussion

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

No Impact. Refer to Section 3.9.2(f). As discussed above, the campus is within a non-VHFHSZ. If necessary, the District would review and revise the existing School Safety Plan to reflect the new STEM building at the campus and to revise any evacuation procedures or routes. In addition, the City of Santa Monica Fire Department would review the Proposed Project plans to ensure that the new facilities comply with the requirements of the Santa Monica Fire Code and to ensure that adequate emergency access is provided. Therefore, the Proposed Project would not impair or interfere with the City's Multi-Hazard Plan, the District and Santa Monica College's All-Hazard Mitigation Plan (District 2017), and the District's Comprehensive School Safety Plan for the Will Rogers campus (District 2018). The Proposed Project would not substantially impair an adopted emergency response or evacuation plan. Therefore, no impact would occur and no mitigation is required.

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. As discussed in Section 3.20.1, the campus is within a non-VHFHSZ and is not in proximity to wildlands or other wildfire prone areas. The campus is fully developed and has relatively flat topography. Vegetation within the campus consists of ornamental landscaping that is regularly irrigated and is not considered a fire hazard. Therefore, the Proposed Project would not exacerbate wildfire risks, such that the campus occupants would be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur, and no mitigation is required.

c) Require the installation 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. As discussed in Section 3.20.1, the campus is within a non-VHFHSZ. The Proposed Project includes redevelopment of the Will Rogers campus and would not change existing land uses at the site. The Proposed Project does not include the installation of infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities. Therefore, the Proposed Project would not exacerbate fire risks or result in temporary or ongoing impacts to the environment. No impact would occur, and no mitigation is required.

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. As discussed in Section 3.20.1, the campus is within a non-VHFHSZ and is not an area susceptible to wildland fires. Furthermore, the campus has relatively flat topography and is not within a landslide zone (CGS 2021). In addition, the campus is within an area of minimal flood hazard (FEMA 2021). As discussed in Section 3.10, "Hydrology and Water Quality," the campus consists of predominately impervious surfaces and the Proposed Project would result in minimal changes to existing drainage patterns. Stormwater bioswales and infrastructure would be incorporated into the Proposed Project's design to capture runoff from the campus. Therefore, the Proposed Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. No impact would occur, and no mitigation is required.

Mitigation Measures

The Proposed Project would not result in significant impacts associated with wildfire, and no mitigation measures are required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, 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?	☐	☒	☐	☐

3.21.1 Environmental Setting

CUMULATIVE PROJECTS

The District is proposing similar types of improvements at several school campuses within the City, including Franklin Elementary School, Grant Elementary School, McKinley Elementary School, John Adams Middle School, and Roosevelt Elementary School. These improvements are anticipated to occur from late 2022 through 2029.

3.21.2 Discussion

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

Less than Significant with Mitigation Incorporated. As discussed in Section 3.1, "Aesthetics"; Section 3.3, "Air Quality"; Section 3.8, "Greenhouse Gas Emissions"; Section 3.9, "Hazards and Hazardous Materials"; Section 3.10, "Hydrology and Water Quality"; and Section 3.13, "Noise," the Proposed Project's construction would result in short-term and temporary changes to the visual environment, increases in air pollutants, greenhouse gas emissions, and noise levels, erosion and degradation of water quality, and potential releases of hazardous materials into the environment. However, with implementation of required BMPs and mitigation measures **MM-HAZ-1, MM-HAZ-2**, **MM-NOISE-1**, and **MM-NOISE-3** as well as compliance with applicable permits, programs, and regulations during construction, the Proposed Project would not substantially degrade the quality of the environment.

As described in Section 3.4, "Biological Resources," the campus is fully developed with an existing elementary school in an urbanized area of the city. There are no state or federally protected wetlands, riparian habitat, or other sensitive natural communities present within or in the vicinity of the campus. Furthermore, no native or naturally occurring vegetation communities are present on the campus or surrounding area that could provide habitat for any candidate, sensitive, or special-status wildlife species. Potential impacts on nesting migratory birds and raptors would be avoided with implementation of **MM-BIO-1**. Therefore, the Proposed Project would not have potential to 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, or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

As described in Section 3.5, "Cultural Resources," 13 buildings, two site features, and one additional feature contribute to the historic district at Will Rogers. The Proposed Project would involve the demolition of four contributors to the historic district: Buildings M, N, P, and K. However, these four contributors do little to define the historic plan of the historic district, nor are they responsible for delineating the interstitial open spaces, such as the central courtyards, that define the spatial relationships and circulation paths of the historic district. Following demolition of the four contributing buildings and implementation of the Proposed Project, the historic district would retain those contributors that create its significant plan, massing, spatial relationships, characteristics, and design. In addition, the rehabilitation of structures would retain the majority of the character-defining features on contributing buildings and would preserve the features which convey the historical and architectural values. Therefore, the Proposed Project would not result in a major change to the physical significance of contributors to the historic district on the campus.

As described in Section 3.5, "Cultural Resources," and Section 3.18, "Tribal Cultural Resources," no previously identified archaeological resources, known cemeteries or burials, or tribal cultural resources have been identified within the campus. However, ground-disturbing activities during the Proposed Project's construction could result in discovery or damage of yet undiscovered buried resources. Implementation of **MM-CUL-1** and compliance with HSC section 7050.5 and PRC section 5097 would ensure that these resources are properly identified, evaluated, and recovered. Additionally, as described in Section 3.7, "Geology and Soils," paleontological resources may be present below the original layer of fill material and may be encountered during ground-disturbing construction activities. With implementation of **MM-PALEO-1**, the Proposed Project would not result in the destruction of paleontological resources. Therefore, the Proposed Project would not eliminate important examples of the major periods of California history or prehistory.

With implementation of Mitigation Measures **MM-BIO-1**, **MM-CUL-1**, **MM-PALEO-1**, **MM-HAZ-1**, **MM-HAZ-2**, **MM-NOISE-1**, **MM-NOISE-2**, and **MM-NOISE-3** and compliance with applicable permits, programs, and regulations, 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 an endangered, rare, or

threatened species, or eliminate important examples of the major periods of California history or prehistory. Impacts would be less than significant.

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

Less than Significant with Mitigation Incorporated. The Proposed Project would not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Rather, the Proposed Project would contribute to the long-term goals of the District through the project objectives outlined below. The Proposed Project is intended to achieve the following objectives:

- Redevelop and renovate the Will Rogers Learning Community campus to accommodate a population of up to 650-700 students and provide properly sized learning environments in accordance with the 2019 SMMUSD Education Master Plan and Educational Specifications.
- Improve learning by replacing undersized and inflexible facilities with adequately sized, functional, and flexible spaces that accommodate modern and diverse learning styles and allow for variable uses.
- Provide enhanced, modern, and functional support spaces, such as cafeterias, labs, maker spaces, and other student services that promote whole child development.
- Improve the arts and athletic facilities in support of both the school and the community's educational, cultural, and recreational enhancement.
- Address noise, safety, and visibility issues by relocating play areas to the center of campus away from adjacent streets and residential neighbors.
- Improve access, circulation, and drop-off and pick-up as well as increase on-campus parking in a manner that improves pedestrian and vehicle safety by expanding and relocating parking lots to the outer edges of the campus.
- Establish a logical and fiscally feasible sequence of phased development.
- Ensure that the campus remains whole and fully functional at the end of each phase.

The scope of the Proposed Project is entirely within an existing elementary school campus that is completely developed. As described in Sections 3.1 through 3.20 of this IS/Proposed MND and Section 3.21.2(a) above, the Proposed Project could potentially result in temporary, short-term construction-related impacts to the visual environment, increases in air pollutants, greenhouse gas emissions, and noise levels, erosion and degradation of water quality, and potential releases of hazardous materials into the environment. However, the Proposed Project would not result in long-term significant irreversible changes or other long-term environmental damage. With implementation of mitigation measures MM-BIO-1, MM-CUL-1, MM-PALEO-1, MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, MM-NOISE-1, MM-NOISE-2, MM-NOISE-3, and MM-TRAN-1, and compliance with applicable permits, programs, and regulations, the Proposed Project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals. Impacts would be less than significant.

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.)

Less than Significant with Mitigation Incorporated. Cumulative environmental effects are multiple individual effects that, when considered together, would be considerable or would compound or increase other environmental impacts. Individual effects may result from a single project or a number of separate projects and may occur at the same place and point in time or at different locations and over extended periods of time. A project's contribution is cumulatively considerable if its incremental effects are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The District is proposing similar types of improvements at several school campuses within the City, including Franklin Elementary School, Grant Elementary School, McKinley Elementary School, John Adams Middle School, and Roosevelt Elementary School. These improvements are anticipated to occur from late 2022 through 2029; therefore, construction activities at these schools are anticipated to overlap with the construction period for the Proposed Project. John Adams Middle School and Grant Elementary School are within 0.5 mile of the campus and have the greatest potential to result in cumulative impacts in combination with the Proposed Project. Several development and infrastructure improvement projects are also proposed throughout the City; however, no projects were identified in the vicinity of the Will Rogers campus (i.e., within 0.5 mile) that have the potential to be constructed at the same time as the Proposed Project.

As described in Sections 3.1 through 3.20 of this IS/Proposed MND, construction activities would result in short-term and temporary effects on the environment, 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; disturbance to nesting birds; destruction of cultural and paleontological resources; and increases in demand for utilities and services. Additionally, the Proposed Project could have long-term effects related to transportation (pedestrian safety) if not mitigated. 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 3.1 through 3.20, 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 for these resource areas.

Aesthetics

The geographic scope for evaluating cumulative aesthetics impacts is the Will Rogers campus and surrounding areas with views to and from the campus. This area is characterized as highly developed and urbanized, with existing views of one- and two-story buildings and landscaping associated with residential, commercial, and public facilities land uses. The cumulative study area 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 JAMS and Will Rogers Learning Community campuses could potentially overlap and be visible from neighboring communities. However, construction activities would be obscured by temporary fencing and would be short-term and temporary. Once constructed, the physical improvements at both campuses would not be tall enough to obstruct existing views and would not have potential to damage scenic resources. Both projects would 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*. Therefore, the architectural values of the campuses would be preserved. Although new lighting is proposed for both projects, light sources would be directed on-site, and would be of similar intensity as existing light sources in the surrounding area and would not result in a measurable contribution to sky glow or night sky pollution. Based on the above discussion, the Proposed Project's contribution to a significant cumulative aesthetics impact would not be cumulatively considerable.

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 Franklin Elementary School, Grant Elementary School, McKinley Elementary School, John Adams Middle School, 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 3.3.2, 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 by requiring dust to be controlled with the best available control measures so that it does not remain visible in the atmosphere beyond the property line of the Proposed Project. 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 JAMS 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's contribution to significant cumulative air quality impacts would not be cumulatively considerable.

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. Because urbanization has contributed to the loss of habitat, a significant cumulative impact exists with respect to 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. Therefore, a significant cumulative impact on biological resources may occur. All projects are required to comply with the MBTA and implement measures to avoid impacting nesting birds. Similarly, the Proposed Project would implement mitigation measure MM-BIO-1 to avoid impacts on nesting birds and project-level impacts would be reduced to a less-than-significant level. With implementation of mitigation measure MM-BIO-1, the Proposed Project's contribution to a significant cumulative biological resources impact would not be cumulatively considerable.

Cultural Resources

The geographic scope for cumulative impacts on cultural resources is the Southern California region. The region has an extensive collection of significant historic and archaeological resources, many of which have been destroyed or substantially altered from development over the years. Even with the extensive laws that have been established to protect such resources, many were destroyed during the period before preservation efforts began or have been inadvertently destroyed during grading and excavation for construction. For these reasons, a significant cumulative impact exists in the region with respect to cultural resources.

Several of the District's cumulative projects contain historic resources and/or districts, and implementation of these projects has the potential to adversely affect significant archaeological resources, historical resources, historic districts, and contributing resources within historic districts. Should the collective projects remove or destroy a substantial representation of the historic districts, impacts from these projects could be cumulatively significant. On their own, none of the buildings that are part of the Will Rogers campus are considered significant historic resources. However, portions of the campus collectively make up a historic district. As discussed in Section 3.5, the Proposed Project includes demolition of four contributors to the historic district. However, the demolition of these contributors and construction of new buildings was not found to be significant as the Proposed Project would not adversely affect the overall integrity of

the historic district. The historic district would retain significant aspects of integrity and would remain eligible for listing in the CRHR and for designation as a City of Santa Monica Landmark. Furthermore, rehabilitation and renovation of identified historical resources on the campus would be implemented consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation*. For these reasons, the Proposed Project's contribution to the significant cultural resources impact would not be cumulatively considerable.

As also noted in Section 3.5, the records search indicated that no previously conducted studies or previously recorded archaeological sites were identified within the Will Rogers campus nor within one-quarter mile radius of the school. Because the campus has been previously developed and the low sensitivity for archaeological resources on the campus, the Proposed Project's contribution to a significant cumulative archaeological resources impact would not be cumulatively considerable. Implementation of mitigation measure MM-CUL-1 would further protect against the potential for the Proposed 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 project site. Energy in the form of natural gas and electricity is required for construction and operation of cumulative projects in the Southern California region. Additionally, gasoline and diesel are required to operate construction vehicles and equipment. The use of alternative fuels and renewable energy supplies are replacing conventional fossil fuel supplies, thereby contributing to cleaner energy sources. Cumulative projects in the region are incorporating more energy efficient design and fixtures to reduce energy consumption. The District has also adopted and has been implementing its Sustainability Plan to improve energy efficiency in existing and new buildings and incorporate renewable technology 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.

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 compliance with the California Building Code, provide solar readiness, and decrease 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's contribution to a significant cumulative energy impact would not be cumulatively considerable.

Geology and Soils

The geographic scope for evaluating cumulative geology and soils impacts is generally site-specific, rather than cumulative in nature, because each development site has unique geologic considerations that would be subject to uniform site development and construction standards. As a result, potential cumulative impacts resulting from geology and soil conditions would be minimized on a site-by-site basis to the extent provided by modern construction methods and code requirements. While Southern California is a seismically active region with several geologic hazards, all development is required to comply with appropriate building codes and site-specific geotechnical design that generally minimizes the potential for projects to exacerbate, and be affected by, geologic hazards. Thus, no significant cumulative geology and soils impacts would not occur. Therefore, the Proposed Project's contribution to cumulative geology and soils impacts would not be cumulatively considerable.

The geographic scope for evaluating cumulative impacts on paleontological resources is the Southern California region. Many of the paleontological resources in the region were destroyed during the period before Federal, State, and local regulations were in place to protect these resources or were inadvertently destroyed during grading and excavation for construction. The destruction of paleontological resources from past development has resulted in the loss of scientific data. For these reasons, a significant cumulative impact exists in the region with respect to paleontological resources. The Will Rogers campus is located within an area that has been previously developed and is predominately underlain by fill materials. Nevertheless, paleontological resources could be discovered and disturbed during construction

activities. With implementation of mitigation measure **MM-PALEO-1**, the Proposed Project's contribution to significant cumulative impacts on paleontological resources would be less than cumulatively considerable.

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 3.8.2, GHG emissions from the Proposed Project would be far below SCAQMD's 3,000 $MTCO2_e$ numerical threshold recommended for non-industrial projects and the adoption of sustainable design features by the school 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's contribution to a significant cumulative GHG impact would not be cumulatively considerable.

Hazards and Hazardous Materials

The geographic scope for evaluating cumulative hazards and hazardous materials impacts is the Will Rogers campus and adjacent properties. Several sites in the surrounding area, including the Will Rogers campus and the adjacent John Adams Middle School campus, are listed on hazardous materials databases and may contain existing hazards. Because ground disturbance in the campus vicinity could release contaminants into the environment, a significant cumulative impact exists in the region with respect to hazards and hazardous materials.

The Proposed Project, as well as other cumulative projects are subject to local, state, and federal regulatory requirements to evaluate, disclose, and mitigated the potential for releases of hazardous materials into the environment prior to grading activities, if such conditions are suspected or known. Implementation of mitigation measures **MM-HAZ-1** and **MM-HAZ-2** would ensure that such materials would be properly removed, handled, and disposed of. With implementation of these mitigation measures, the Proposed Project's contribution to a cumulative hazardous materials impact would not be cumulatively considerable.

Cumulative hazards related to pedestrian safety are limited to the areas immediately surrounding the project area. Due to the proximity of the Will Rogers campus and the JAMS campus, the cumulative context includes the areas around both schools. Because of existing traffic controls, pedestrian safety mechanisms (i.e., crosswalks), and the City of Santa Monica's Safe Routes to Schools program, cumulative impacts are considered to be less than significant. As described in Section 3.9.1, the Proposed Project would be consistent with all City design and safety standards including those set forth in the City's Municipal Code. However, the proposed new driveway along 16th Street would conflict with an existing crosswalk. To avoid any hazards, mitigation measure **MM-HAZ-3** would require the District to coordinate with the City to relocate the existing crosswalk on 16th Street located near the campus' northeastern boundary. The implementation of mitigation measure **MM-HAZ-3** would reduce the Proposed Project's contribution to cumulative impacts to less than cumulatively considerable.

Hydrology and Water Quality

The geographic scope for evaluating cumulative hydrology and water quality impacts is the Santa Monica Bay Watershed. New projects in the area, both individually and cumulatively, could increase the impervious surface areas, increase the volume of stormwater runoff, and contribute to pollutant loading in the storm drain system with discharge to creeks and ultimately to the Pacific Ocean. All projects are required to comply with drainage and grading regulations and ordinances that control runoff and regulate water quality at each development site. New development and redevelopment projects would be required to demonstrate that stormwater volumes could be managed by on-site and downstream conveyance facilities and would not induce flooding. New projects also would be required to comply with local, state, and federal regulating stormwater discharge during construction (such as a Construction SWPPP) and operation (such as a WQMP) and water quality. The projects would be subject to review and approval by the

appropriate City, County, and/or state to ensure that appropriate BMPs and treatment measures are implemented to reduce pollutants in stormwater and avoid adverse impacts to surface water quality. New development and certain redevelopment projects are required to retain and treat a specified volume of stormwater runoff on-site through incorporation of BMPs so that stormwater volumes. Therefore, cumulative impacts related to hydrology and water quality are considered less than significant.

As described in Section 3.10, "Hydrology and Water Quality," the Proposed Project would result in temporary and localized ground disturbance during construction. The District would comply with NPDES requirements, including design, management, and monitoring requirements to protect water quality and reduce impacts related to stormwater (and some non-stormwater) discharges during construction through implementation of BMPs for preventing water quality degradation. The Proposed Project would also not change the existing land uses and would result in a decrease in impervious surfaces compared to existing conditions. For these reasons, the Proposed Project's contribution to cumulative impacts on hydrology and water quality would not be cumulatively considerable.

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. A less-than-significant cumulative impact exists in the area with respect to land use and planning.

Cumulative land use and planning impacts are considered for the combined effects of the Proposed Project and proposed improvements at the adjacent John Adams Middle School. Both the Will Rogers and John Adams Middle School campuses are zoned for Institutional/Public Lands (PL) and have a land use designation of Institutional/Public Lands in the City's General Plan. Schools are allowable within the Institutional/Public Lands designation, 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 or expand the boundaries of the school, and would continue to be consistent with the City's land use designation for the site. Additionally, the Proposed Project would comply with all applicable zoning regulations, including the City's height standards. As such, 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, including the proposed improvements at John Adams Middle School, would be subject to the same land use polices and zoning regulations. Therefore, the Proposed Project's contribution to cumulative land use and planning impacts would not be cumulatively considerable.

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. Therefore, a less-than-significant cumulative impact exists in the area with respect to noise.

Because the Will Rogers and John Adams Middle School campuses are located across 16th Street from one another, the combined effects of noise from construction could result in elevated noise levels that exceed standards. While these noise sources would be intermittent, temporary, and would cease at the end of the construction phase, elevated combined noise levels could occur for extended periods of time thereby resulting in significant cumulative impacts.

Noise and vibration associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual project. With implementation of mitigation measures **MM-NOISE-1** and **MM-NOISE-3**, construction-related impacts from the Proposed Project would be reduced to less than cumulatively considerable. During operations, neither of these projects would increase vehicle trips nor increase stationary noise sources to a cumulatively considerable level. **MM-NOISE-2** would ensure that stationary sources are sited such that significant increases in noise levels would not occur at nearby sensitive receptors. Therefore, the Proposed Project's contribution cumulative noise impacts would not be cumulatively considerable.

Transportation

The geographic scope for evaluating cumulative transportation impacts is the transportation network serving the campus. Continued development within the City of 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. A less-than-significant cumulative impact exists in the transportation network serving the campus.

Overlapping construction activities for the proposed improvements at John Adams Middle School and the Will Rogers campus 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. Neither project would generate permanent increases in vehicle trips because they would not increase the existing capacity or enrollment of the schools. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts with respect to vehicle trips.

If haul trips and the operation of heavy vehicles were to occur along roadways with constrained right-of-way, construction activities could potentially result in an increase in roadway hazards due to incompatible uses. Construction may also require temporary closures of the public right-of-way adjacent to the campuses or increase safety hazards due to construction vehicles entering and exiting the campus (e.g., for delivery of building materials). Implementation of mitigation measure MM-TRAN-1 would require the construction contractor to prepare and implement a TTCP to address safety hazards, which would require the scheduling of construction staging and delivery outside of peak student pick-up/drop-off times. With implementation of mitigation measure MM-TRAN-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 tribes in the region. The Proposed Project area is affiliated with the Gabrieleño Band of Mission Indians – Kizh Nation. Past development has contributed to the loss and destruction of tribal cultural resources. Therefore, a significant cumulative impact exists in the region with respect to tribal cultural resources.

The District sent formal notification letters to two Native American tribes in accordance with AB 52 and PRC section 21080.3.1 regarding the Proposed Project. Neither tribe requested consultation, therefore, no known resources within the campus area were identified as tribal cultural resources as defined in PRC Section 21074. Additionally, the campus has been fully developed since the late 1940s and no tribal cultural resources have been identified in the campus area. As such, it is not anticipated that tribal cultural resources would be encountered during construction-related ground disturbing activities. 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 cumulative projects throughout the City. Development within the City has resulted in increased demands on water supply, stormwater drainage, wastewater treatment, electricity, telecommunications, and solid waste disposal systems. However, new development is required to comply with regulations intended to increase water and energy efficiency and reduce stormwater discharges and solid waste generation, thereby reducing demands on existing utility providers. A less-than-significant cumulative impact exists in the City with respect to utilities and service systems.

Construction of the Proposed Project would require the consumption of water as well as electricity and natural gas to power equipment and vehicles. Water and energy usage would be relatively minor, limited to the construction periods, and would be served by existing utility service providers. Once operational, the Proposed Project would not result in an increase in student capacity or faculty at the Will Rogers campus. Additionally, the Proposed Project would not require the relocation or construction of new or expanded utilities beyond establishing the connections

from existing utility service lines to the proposed campus facilities. Compliance with State regulations, such as CALGreen, and Districtwide sustainability policies would also reduce water and energy consumption associated with District facilities over time compared to existing conditions. Therefore, the Proposed Project's contribution to cumulative impacts on utilities and service systems would not be cumulatively considerable.

Based on the above discussion, the Proposed Project's contribution to cumulative environmental impacts would be less than cumulatively considerable.

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

Less than Significant with Mitigation Incorporated. As discussed in Section 3.3, "Air Quality"; Section 3.8, "Greenhouse Gas Emissions"; Section 3.9, "Hazards and Hazardous Materials"; Section 3.10, "Hydrology and Water Quality"; Section 3.13, "Noise"; and Section 3.17, "Transportation"; the Proposed Project's construction and operation would result in increases in air pollutants, greenhouse gas emissions, and noise levels; degradation of water quality; potential releases of hazardous materials into the environment; and disruptions to the transportation network. However, with implementation of required BMPs; mitigation measures **MM-HAZ-1, MM-HAZ-2**, **MM-HAZ-3**, **MM-NOISE-1**, **MM-NOISE-2**, **MM-NOISE-3**, and **MM-TRAN-1**; and compliance with applicable permits, programs, and regulations, these environmental effects would not cause substantial adverse effects on human beings.

Mitigation Measures

With implementation of mitigation measures **MM-HAZ-1, MM-HAZ-2**, **MM-HAZ-3**, **MM-NOISE-1**, **MM-NOISE-2**, **MM-NOISE-3**, and **MM-TRAN-1**, the Proposed Project would not result in significant impacts.

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3.20 Mandatory Findings of Significance

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