

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Franklin Elementary School Campus Plan Project ***Final Initial Study/Mitigated Negative Declaration*** SCH. No. 2025030429

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

APRIL 2025

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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

FRANKLIN ELEMENTARY SCHOOL CAMPUS PLAN PROJECT

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Prepared for:

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

Prepared by:



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LONG BEACH, CALIFORNIA 90806

APRIL 2025

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1 INTRODUCTION

The Santa Monica-Malibu Unified School District (SMMUSD or District) prepared an Initial Study/Mitigated Negative Declaration (IS/MND or MND) for the Franklin Elementary School Campus Plan Project (Proposed Project). Pursuant to sections 15072 and 15073 of the California Environmental Quality (CEQA) Guidelines, the MND and Notice of Intent (NOI) to adopt the MND were circulated for a 34-day public review period that began on March 7, 2025 and ended on April 9, 2025.

The NOI to Adopt an MND was filed with the County of Los Angeles Clerk on March 7, 2025 and copies of the NOI were distributed to residences within 500 feet of the Franklin Elementary School campus and mailed to interested parties and organizations for receipt by March 7, 2025. Additionally, the IS/MND and the NOI were posted on the SMMUSD website throughout duration of the public review period and hard copies were made available for public review at the Franklin Elementary School campus and at the SMMUSD offices. A public meeting was also held at Franklin Elementary School on March 18, 2025 to allow for public comment. The District accepted comments on the MND until April 9, 2025 to ensure the opportunity for adequate public input was provided.

Pursuant to section 15074(b) of the CEQA Guidelines, the lead agency is required to consider the MND along with any comments received during the public review period. While written responses to comments submitted on MNDs are not required, responses are provided to each written and oral comment received for the record, with particular regard to environmental concerns raised relative to CEQA-related issues. Based on the whole record, the District finds that the comments received do not raise any new potentially significant impacts, do not identify an increase to the severity of any impacts disclosed in the MND, and do not require substantial revision of the MND. No new mitigation measures are needed as a result of the comments. Pursuant to section 15073.5 of the CEQA Guidelines, recirculation of the MND is not required. Preparation of an EIR is not required since all potentially significant environmental impacts that may result from the project are mitigated to less than significant.

In addition to considering comment letters received during the public review period, the lead agency is required to adopt a Mitigation Monitoring and Reporting Program (MMRP) pursuant to sections 15074(d) and 15097 of the CEQA Guidelines. The MMRP is a program for reporting on or monitoring the changes that it has either required in the Proposed Project or made a condition of approval to mitigate or avoid significant environmental effects. Accordingly, the MMRP for the Proposed Project should be included for consideration by the District as the lead agency.

Table 1, List of Agencies and Persons Submitting Comments, below, provides a list of agencies and/or persons that submitted comments on the MND during the public review period.

TABLE 1. LIST OF AGENCIES AND PERSONS SUBMITTING COMMENTS

Letter Reference	Commenting Agency, Organization, or Individual	Date of Comment
Agencies		
A1	Department of Toxic Substances Control (DTSC)	March 20, 2025
Organizations		
O1	Santa Monica Conservancy	April 9, 2025
Individuals		
I1	Lauren Birnstein	March 22, 2025
I2	Peter Birnstein	March 23, 2025
I3	Lauren Birnstein	April 9, 2025
I4	Betsy Newell	March 25, 2025
I5	Erica and Kyle Wheeler	April 7, 2025
I6	Tricia Crane	April 9, 2025
I7	Caron Block	April 8, 2025
I8	Jill Chaplin	April 8, 2025
I9	Ray and Dina Johnson	April 8, 2025
I10	Bhakti Mehta	April 8, 2025
I11	Gelfand Family	April 8, 2025
I12	George, Sue, and Elizabeth Ferell	April 8, 2025
I13	Joan Moschovakis	April 9, 2025
I14	Gary Freedman	April 8, 2025
I15	Spielman	April 8, 2025
I16	Audrey Bly	April 8, 2025
I17	Karen Freedman	April 9, 2025
I18	Judah Carrillo	April 9, 2025
I19	Nikki Kolhoff	April 9, 2025
I20	Corinne Koutsouros	April 9, 2025
I21	Hana Leshner	April 9, 2025
I22	Harry Leshner	April 9, 2025
I23	David Yuguchi	April 9, 2025
I24	Nina Segil	April 9, 2025

2 COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD (MARCH 7 TO APRIL 9, 2025)

A1. Department of Toxic Substances Control (DTSC), Letter dated March 20, 2025.



SENT VIA ELECTRONIC MAIL

March 20, 2025

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
1717 4th Street
Santa Monica, CA 90401
cupton@smmusd.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE FRANKLIN ELEMENTARY
SCHOOL CAMPUS PLAN PROJECT DATED MARCH 11, 2025, STATE
CLEARINGHOUSE NUMBER [2025030429](#)

Dear Carey Upton,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Franklin Elementary School Campus Plan Project (Project). The proposed Project would renovate and modernize the existing Franklin Elementary School campus to develop new and updated facilities. At full buildout, the proposed Project would increase the campus building area by approximately 29,286 square feet. Redevelopment and modernization of Franklin Elementary School would consist of removing and demolishing seven permanent buildings, two modulars, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility. All entries to the school would be gated and/or secured After reviewing the Project, DTSC recommends and requests consideration of the following comments:

A1-1

Carey Upton
March 20, 2025
Page 2

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise specifically exempted under section [§17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§17268](#), DTSC recommends the district continue to investigate, clean up the Site under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Construction](#) webpage.

A1-2

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

A1-3

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in [DTSC's Preliminary Endangerment Assessment \(PEA\) Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

A1-4

DTSC appreciates the opportunity to comment on the MND for the Franklin Elementary School Campus Plan Project. If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment](#).

A1-5

Carey Upton
March 20, 2025
Page 3

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via [CEQA Review email](#) for additional guidance.

A1-6

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@opr.ca.gov

John Bellas
Principal in Charge
Michael Baker International / Consulting Firm
jbellas@mbakerintl.com

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

A1. Responses to Comments from the Department of Toxic Substances Control (DTSC), Letter dated March 20, 2025.

- A1-1 The comments provided are introductory and include a brief summary of the Proposed Project actions, as described in the Draft IS/MND Project Description (Section 3.4, Proposed Project). The comments also state that the DTSC recommends and requests that the District consider the subsequent comments provided in the letter.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- A1-2 This comment states that if the District plans to use California Department of Education (CDE) state funds for the Proposed Project, then the District shall comply with requirements of the California Education Code, unless otherwise exempted. If CDE state funds are not used, or if the Proposed Project is otherwise exempted, the DTSC recommends the District continue to investigate and clean up the site under the oversight of Los Angeles County and in conformance with applicable DTSC guidance documents, as appropriate.

At this time, the District will not be seeking CDE State funds for the Proposed Project. Nonetheless, all Proposed Project excavations, site improvements, and construction would conform with applicable regulations and DTSC guidelines and policies pertaining to the handling, treatment, and disposal of any hazardous materials or substance identified and/or encountered on-site.

- A1-3 This comment states that a local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In such cases, the CDE would require the DTSC to review and approve prior to CDE final approval, unless a project is exempt under CDE section 17268.

Refer to Response to Comment A1-2, above. No further response is required.

- A1-4 This comment states that the DTSC recommends all imported soil and fill material to be tested to assess whether contaminants of concern meet screening levels as outlined in the DTSC's Preliminary Endangerment Assessment Guidance Manual. Additionally, the DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing of fill is necessary. The comments indicate that the Proposed Project should minimize the possibility of introducing contaminated soil and fill material, and that there should be documentation of the origins of the soil or fill material; if applicable, sampling should be conducted to ensure that imported soil and fill materials are suitable.

All on-site soils testing to date has been, and will continue to be, performed in accordance with the DTSC's guidance. If imported soils are to be used during Proposed Project construction, the District will comply with the DTSC Advisory Clean Imported Fill Material Fact Sheet and other applicable DTSC guidance documents, documenting the source of such soils and the prior land use; as appropriate, sampling will be conducted to ensure that the imported soils are suitable for use on the school campus. Refer also to Section 4.9, Hazards and Hazardous Materials, of the Draft IS/MND for additional discussion and a listing of technical analyses performed for the Proposed Project site.

- A1-5 This comment concludes the letter and provides links to additional information on DTSC processes, as well as DTSC contact information if the District has questions on the comments provided. No further response is necessary.

O1. Santa Monica Conservancy, Letter dated April 9, 2025.



**SANTA MONICA
CONSERVANCY**

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

April 9, 2025

Carey Upton
Chief Operations Officer, Santa Monica Malibu Unified School District
cupton@smmUSD.org

RE: MND Public Comment – Franklin Elementary School

Thank you for this opportunity to review and comment on the Mitigated Negative Declaration (MND) for Franklin Elementary School dated March 2025, prepared for the Santa Monica-Malibu Unified School District Facility Improvement Projects.

O1-1

As representing historic preservation interests in Santa Monica, the Santa Monica Conservancy is pleased to note that this report is comprehensive and complete in its analysis of environmental impacts to historic resources. This analysis is based upon the Historical Resources Inventory Report prepared by Architectural Resources Group in 2022 that identifies one eligible historical resource on the Franklin Elementary School Campus: Building B (including its landscape), which was found to be individually eligible for listing in the California Register of Historical Resources and for local (Santa Monica) Landmark designation.

O1-2

Franklin Administration Building (Building B) is an excellent representative of the Works Progress Administration (WPA) period in Santa Monica which coincided with school reconstruction after the 1933 Long Beach earthquake. The analysis demonstrates the proposed project will retain Building B's character-defining features and will continue to retain sufficient integrity to convey its historical and architectural significance. Building B will thus continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark at project completion. In addition, the analysis finds that the project will not compromise the significance or integrity of the potential Montana Avenue Multi-Family Residential Historic District, within which the project site is located. The proposed project would not result in the demolition or material impairment of the potential district. The potential district will continue to be eligible for local Landmark designation at project completion.

O1-3

Retaining and celebrating this tangible representation of our history at the Franklin Elementary campus is a benefit for the Santa Monica community and an important part of a child's education. The Santa Monica Conservancy looks forward to continued efforts in conjunction with the School District to promote and share these stories of our history with our community.

O1-4

Sincerely,

Kaitlin Drisko

Kaitlin Drisko
Executive Director
Santa Monica Conservancy

O1. Responses to Comments from the Santa Monica Conservancy, Letter dated April 9, 2025.

- O1-1 This comment is introductory and notes the Santa Monica Conservancy's (Conservancy) appreciation for the opportunity to comment on the Draft IS/MND.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- O1-2 The comment identifies the role of the Conservancy and acknowledges the identification of Building B on the school campus as being individually eligible for the California Register of Historical Resources and for local (Santa Monica) Landmark designation.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- O1-3 The comments acknowledge the historic value of the Administration Building (Building B) on the school campus as a representation of the Works Progress Administration (WPA) period in Santa Monica. The comments summarize the findings of the Historical Resources Inventory Report (prepared by Architectural Resources Group in 2022) and Draft IS/MND, concurring that Building B would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark at the completion of the Proposed Project. In addition, the commenter states support for the findings that the Proposed Project would not compromise the significance or integrity of the potential Montana Avenue Multi-Family Residential Historic District or result in demolition or material impairment of the potential district, and that the potential district would remain eligible for local landmark designation at Proposed Project completion.

As stated, the comments indicate that the commenter concurs with the findings of the Draft IS/MND related to historical resources in that the Proposed Project would not interfere with Building B being individually eligible for listing in the California Register and for local designation, and that the Proposed Project would not result in demolition or material alteration of the historical resource. The comments do not identify a deficiency in the Draft IS/MND's analysis or a potential new or exacerbated significant environmental impact. No further response is required.

- O1-4 This comment concludes the letter and states that the Conservancy looks forward to working with the District. No response is necessary. The District similarly looks forward to continuing its work with the Conservancy.

11. Lauren Birnstein, Email dated March 22, 2025.

From: Lauren Birnstein [REDACTED]
Sent: Saturday, March 22, 2025 11:52 AM
To: Upton, Carey <cupton@sommisd.org>
Subject: Franklin Elementary School campus Plan Project

I object to Phase 2 and, therefore, the entire Plan. Building B is in need of demolition. | 11-1
It is unsafe— built with materials that are toxic and can burn easily. It should be rebuilt |
to 2 or 3 stories with classrooms. The buildings along the alley should be rebuilt as | 11-2
single story and no higher than the existing classrooms. Those can be used for
administration offices and some classrooms.

Please notify me when the Board meeting takes place in May or June in sufficient time | 11-3
to attend. Thank you, Lauren Birnstein, [REDACTED]

I1. Responses to Comments from Lauren Birnstein, Email dated March 22, 2025.

- I1-1 The comments provided state objection to Phase 2 of the Proposed Project as well as the Campus Plan. The commenter provides the opinion that Building B should be demolished as it is unsafe and may contain toxic materials that can ignite easily. The comments state that Building B should be rebuilt to two to three stories with classrooms.

The District acknowledges the comments identifying objection to Phase 2 (and overall Campus Plan) and suggesting the rebuilding of Building B as a two to three story building with classrooms. The demolition of Building B, which is a historical resource, would have an unmitigable, significant impact. Since the Proposed Project would retain and rehabilitate Building B, no significant impact to the historical resource would occur. These comments neither identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

Potential effects (e.g., air quality, hazards) resulting from the implementation of the Proposed Project have been evaluated in the Draft IS/MND pursuant to CEQA requirements. Mitigation measures are proposed to ensure that potential impacts are reduced to less than significant.

- I1-2 The comments state that the proposed buildings adjacent to the alley should be single story and not higher than the existing classrooms, and that these buildings could be used for administration offices and classrooms.

The District acknowledges the comments provided regarding the height and proposed use of future buildings planned adjacent to the alley. Unfortunately, to accommodate school operations, the new building needs to be two stories. Further, administration offices should be located in the front of the campus, consistent with the current campus layout and the proposed Campus Plan for ease of access and campus security. The comments neither identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I1-3 This comment requests notification of when the next Board of Education hearing takes place within sufficient time to attend.

The District acknowledges the commenter's request for notification. No further response is required.

12. Peter Birnstein, Email dated March 23, 2025.

From: Peter Birnstein [REDACTED]
Sent: Sunday, March 23, 2025 2:39 PM
To: Upton, Carey <cupton@smmusd.org>
Subject: Franklin Elementary School Campus Plan Project

Dear Mr. Upton,

I object to the current Phase 2 Plan. A better alternative for all concerned is

12-1

demolition of Building B. Building B has materials that present a health hazard and are susceptible to burning easily. In it's place a school building of 2 or 3 stories of modern, up to date classrooms can be built. The buildings along the 'east alley' can be replaced with single story administrative offices and additional classrooms.

12-2

Please notify me well ahead of the School Board meeting that is to be scheduled in May or June so that I may attend and participate.

12-3

Thank You,

Peter Birnstein
834 25 th St



I2. Responses to Comments from Peter Birnstein, Email dated March 23, 2025.

- I2-1 The comments provided state objection to Phase 2 of the Proposed Project. The commenter provides the opinion that Building B should be demolished as it is unsafe and may contain toxic materials that can ignite easily. The comments state that Building B should be rebuilt to two to three stories with classrooms.

Refer to Response to Comment I1-1.

- I2-2 This comment states that the proposed buildings adjacent to the alley should be single story and used for administration offices and additional classrooms.

Refer to Response to Comment I1-2.

- I2-3 This comment requests notification of when the next Board of Education hearing takes place within sufficient time to attend.

The District acknowledges the commenter's request for notification. No further response is required.

I3. Lauren Birnstein, Email dated April 9, 2025.

From: [Lauren Birnstein](#)
To: [Upton, Carey](#)
Subject: More comments on Franklin Plan
Date: Wednesday, April 9, 2025 8:27:29 AM

I know it's almost impossible to "beat city hall" but here goes:

We object to this plan for various reasons. As stated in the meeting on April 7th, the maker space for elementary school children is a waste of space and money. The administration building is unsafe to repel fires, has asbestos, and is not earthquake safe. Keeping this building does not add to the design proposal and the space could be used to provide more classrooms instead of adding to the east side of the school.
Lauren and Peter Birnstein

I3-1

I3-2

I3. Responses to Comments from Lauren Birnstein, Email dated April 9, 2025.

- I3-1 The commenter states objection to the Campus Plan. The comments state that the Maker Space for elementary school students is an inefficient use of space and funding.

The District acknowledges the comments provided regarding objection to the Campus Plan and the proposed Maker Space. The comments provided do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I3-2 The commenter provides the opinion that the administration building should be demolished as it is unsafe and not fire-resistant, may contain asbestos, and is not earthquake safe. The comments state that retaining this building does not add to the design of the campus, and the land area could instead be used for classrooms instead of adding classrooms along the east side of the campus.

Refer to Responses to Comments I1-1 and I1-2.

14. Betsy Newell, Email dated March 25, 2025.

Date: March 25, 2025
Re: Franklin School Elementary School Campus Plan Project

To: Carey Upton
SMMUSD
1714 4th St.
Santa Monica, CA 90401

As a parent and a neighbor of our beloved Franklin School located in our neighborhood,

I would like to express my concern in regard to the entirety of Plan 2 – and therefore, according to what I understand, makes me currently object the entire plan as currently presented.

14-1

Though I understand the need for historical preservation and what it holds for our culture and our city and its importance, I am continually concerned about the importance of preserving a historical structure (the main large Franklin School building located directly on Montana Ave., vs. the fact that hundreds of young children and adults are spending often more waking hours in that building than they are in their own home - in a building that's at least 98 years old...(we have photos of the school structure from 1927 in our home) in a geographical area that is prone to dangerous and deadly earthquakes, and the fact that the school site may have not been retrofitted properly for many years. To me it says that despite a historical organization's efforts to retain it as a historical cultural structure and their preservation desires, there is little or no concern for the number of human beings that potentially occupy that building throughout the day – anywhere from between 7:30 am until sometimes up to 6:00 pm or 7:00 pm on a daily basis. In my honest opinion, safety and the protection of human life needs to be considered when looking at all phases of Franklin School Redevelopment. Therefore I am not in favor of the current project of the Phase 2 Plan as it is structured.

14-2

Thank you, Betsy Newell

I4. Responses to Comments from Betsy Newell, Email dated March 25, 2025.

- I4-1 The commenter states objection to Phase 2 of the Proposed Project as well as to the Campus Plan.

Refer to Response to Comment I1-1.

- I4-2 The comments indicate recognition of the historical importance of Building B and proposed preservation, while expressing concern for public health and safety relative to earthquake events.

Under existing conditions, Building B has not been brought up to current seismic building design codes; however, this is typical of similar older structures wherein seismic analysis typically only reoccurs when significant alteration or renovations are being undertaken. The Franklin Elementary school campus has been evaluated relative to potential risk of and damage caused by seismic events; refer to Section 4.7, Geology and Soils, of the Draft IS/MND. Based on the findings of the technical evaluations completed, it has been determined that no active faults are present on the Proposed Project site, and therefore, the potential for surface fault rupture at the campus is low. As indicated in the Draft IS/MND, all development would occur in accordance with the California Building Code requirements adopted at the time when construction occurs, and the Proposed Project would implement appropriate seismic design recommendations as identified in the geotechnical evaluations prepared for the subject site. With incorporation of such measures, the Proposed Project would not directly or indirectly cause substantial adverse effects, including the risk of loss or injury due to seismic ground shaking or failure. Impacts in this regard would be less than significant.

15. Erica and Kyle Wheeler, Letter dated April 7, 2025.

April 7, 2025

Mr. Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
1717 4th Street
Santa Monica, CA 90401

Re: Intent to Adopt a Draft Initial Study/Mitigated Negative Declaration for the Franklin Elementary School Campus Plan Project

Dear Mr. Upton:

We are concerned about the Franklin Elementary School Campus Plan Project (the “Proposed Project”) as outlined in the materials provided for public review by Santa Monica-Malibu Unified School District (“SMMUSD”). First and foremost, at a time when taking care of the needs of students, teachers and other school personnel has never been more important, the Proposed Project would instead use significant funds to pay for physical buildings. The funds would be much better spent on raising pay for teachers and other school personnel across the SMMUSD school district and investing in programs that directly benefit students.

15-1

As contemplated, the Proposed Project would span a length of time of approximately 10 to 30 years based on the description provided at the community meeting held at Franklin Elementary School on March 18, 2025. This means the neighborhood and the school itself would be a construction zone for an extremely long period of time. Picture the risks to young children going to school in this environment from exposure to environmental toxins, disruptive noise and compromised safety – both from the nature of the construction activity itself and also the risks of so many outside individuals present in connection with the Proposed Project co-occupying the campus with children at the same time. The impact to the neighborhood during the construction phase would also be significant and negative and cannot be satisfactorily mitigated. Unlike many decades ago when all of Santa Monica was developing, the neighborhood around Franklin Elementary School has long been fully developed, with its character and quality of life well established, and real limitations now exist on the magnitude of change that can be accommodated. The residential building codes enumerate many of these limitations, which all residents are required to abide by, and for good reason. The list of problems with the Proposed Project is too numerous to expand upon in a brief letter.

15-2

As an alternative, a more sensible approach would be to truly consider the priorities that are most important (such as prioritizing the actual needs of students, teachers and other school personnel), the costs and benefits involved in how funds are allocated (how can a building be more worthy of investment than a person in light of the budgetary challenges that exist today?) and the practical realities of improving the physical learning environment at Franklin Elementary School in light of the real constraints that exist (versus pretending as though all negative issues can be sufficiently mitigated when in fact they cannot). For example, with a scaled-back budget and project scope there could be a win-win of perhaps focusing on targeted renovations over summer break for a period of years that is not disruptive to the learning environment, less disruptive to the community and more enabling of a solution focused on getting resources redirected toward children and teachers where the impact is greatest.

15-3

Needless to say, all of this is happening against a backdrop of severe devastation from the Los Angeles wildfires including the closely proximate Palisades Fire. For years to come, any construction work at Franklin Elementary School would cost dramatically more due to market demand for the rebuilding effort after the Los Angeles wildfires. It would also hurt those who are experiencing a time of crisis and need to rebuild their homes and businesses.

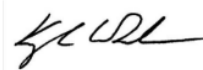
15-4

We look forward to opening a dialogue with SMMUSD, to hearing and learning more and to sharing our concerns in more detail through this process.

Sincerely,



Erica Wheeler, Franklin Elementary School Class of 1990



Kyle Wheeler

15. Responses to Comments from Erica and Kyle Wheeler, Letter dated April 7, 2025.

- I5-1 The comments indicate concern that the Proposed Project would use significant funds to pay for physical buildings and indicate that such funding would be better spent on salaries for District teachers and personnel and student programs. The District acknowledges the comments provided. However, the Proposed Project is being funded through General Obligation Bonds, including Bond Measure QS, which City of Santa Monica residents approved in November of 2024. As required by Measure QS, bond money can only be used for capital improvement projects, such as construction, rehabilitation, replacement, and/or modernization, including new classrooms, playfields, and campus improvements that were identified in the IS/MND's Project Description.

Further, it would be illegal to use bond money for teacher or administrative salaries, or ongoing student programs. Finally, social and economic impacts/issues are not a subject of concern for CEQA. This comment is not related to the content or adequacy of the Draft IS/MND and does not raise a specific environmental issue. No further response is required.

- I5-2 The commenter states concern over the length of the construction period and potential effects on student safety from construction activity and personnel, as well as on the established character and quality of the surrounding neighborhood, and limitations "on the magnitude of change that can be accommodated" within the existing neighborhood.

As stated on page 3-7 of the Draft IS/MND, the District is proceeding with design and engineering of Phase 1 (1A and 1B) of the funded activities, while later phases of the Proposed Project would occur at the District's discretion when funding becomes available. Construction of the remaining phases would occur when additional funding is available. Construction of Phase 1 is scheduled to begin in the summer of 2026 and last approximately 18 months, as shown in Table 3-2, Construction Schedule, on page 3-10 of the Draft IS/MND. At this time, the start of additional phases is speculative; however, as identified in Table 3-2, Phase 2 construction is anticipated to last 27 months; Phase 3 construction is anticipated to last 24 months; and Phase 4 construction is anticipated to last 20 months.

The Proposed Project would potentially take up to 30 years to complete if all phases are implemented, largely due to funding availability. It is anticipated that pauses of one or more years between construction phases would occur. Implementation of the Proposed Project would therefore not result in constant construction activity on-site (e.g., all phases constructed back-to-back). However, the MND evaluated continuous construction activity in order to consider a "worst case" scenario.

The potential effects (e.g., air quality, noise, hazards) resulting from the Proposed Project's construction, as well as the change in the visual setting (aesthetics), have been evaluated in the Draft IS/MND pursuant to CEQA requirements. Mitigation measures are proposed to ensure that potential impacts resulting with Proposed Project implementation are reduced to less than significant. This comment is not related to the content or adequacy of the Draft IS/MND and does not raise a specific environmental issue. No further response is required.

- I5-3 The commenter suggests the Proposed Project should prioritize the needs of students, teachers, and other school personnel; costs and benefits of how funds are allocated; and improving the physical learning environment at Franklin Elementary with consideration of certain constraints. The comments suggest that the District consider “a scaled-back budget and project scope:” targeted renovations over summer break to reduce potential disruptions to students and the community; and redirecting resources toward children and teachers.

Refer to Response I5-2, above, regarding potential effects from construction of the Proposed Project and the use of bond funds for non-capital improvement related expenses. Other comments provided are not related to the content or adequacy of the Draft IS/MND and do not raise a specific environmental issue. No further response is required.

- I5-4 The commenter references proximity of the recent Los Angeles wildfires to the school and potential effects on the cost of future construction work at Franklin Elementary School due to market demand for rebuilding efforts, as well as potential effects on others who are rebuilding their homes and businesses in the area.

Concerns with cost of a project are not related to the content or adequacy of the Draft IS/MND and does not raise a specific environmental issue. No further response is required.

16. Tricia Crane, Letter dated April 9, 2025.

From: Tricia Crane [REDACTED]
Sent: Wednesday, April 9, 2025 4:48 PM
To: Upton, Carey; Mignano, Alicia; Kean, Jon; Smith, Jennifer; Lieberman, Laurie; Leon-Vazquez, Maria; Tahvildaran-Jesswein, Richard; Rouse, Stacy
Subject: Public Comment re the Franklin School Plan

To: The Board of Education, SMMUSD and Facilities Operation Officer Carey Upton
 From: Tricia Crane
 Re: My personal comments for submission to the school district regarding the current Franklin Plan:

1)The pervasive use of plastics in our world is now a well-documented environmental crisis that we must address. We need to help solve the problems plastics pose, not contribute to the problem.

This is why the sports field in the Franklin Plan must not be reduced in size and must remain natural grass, not synthetic turf for the reasons below, all of which are issues that should be disclosed as part of the required CEQA review.

- The proposed field is a giant sheet of plastic, which is made from fossil fuels and toxic chemicals and will inevitably lead to further contamination of our environment.
- Plastic grass blades break down through UV radiation, wear and tear and the elements, making it a source of micro-and nano plastic contamination.
- PFAS content should be tested: Some manufacturers claim their turf is PFAS-free, but this has not been fully supported by independent research. It is tricky because if you test for parts per million, it may not show up in the lab - but because the former head of the NIEHS and other toxicologists say that PFAS can be harmful to human health at parts per quadrillion, it should at least be tested at parts per trillion as they do (or used to do, prior to the current administration) for water. Useful link here:
<https://www.turi.org/publications/per-and-poly-fluoroalkyl-substances-pfas-in-artificial-turf-carpet/>
- Cleaning protocol: Water is inadequate to “clean” body fluid spills. Turf manufacturers themselves suggest using disinfectants, and many schools use a bleach solution. Body fluids like blood and vomit can carry germs and require prompt attention and disinfection. Grass fields deal with these pathogens through natural biological activity.
- Injuries: Studies show more injuries on artificial turf than natural grass. Here is one:
<https://pubmed.ncbi.nlm.nih.gov/23637148/>
- Natural grass fields are safer for children’s health and for the environment. Grass cleans the air by removing carbon dioxide.

16-1

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con't

2) The Maker Space building should be removed from this elementary school project and the land used for open space instead. Classrooms are maker spaces. Ask any teacher.

16-2

3) The community comment process for the Franklin Plan has been woefully inadequate and should be extended.

16-3

Thank you

16. Responses to Comments from Tricia Crane, Letter dated April 9, 2025.

- 16-1 The commenter expresses concern regarding the proposed athletic field renovations, stating that the field must not be reduced in size and must remain natural grass, instead of synthetic turf. The comment lists the following reasons why the turf must remain natural grass: a) the proposed field is a giant sheet of plastic made from fossil fuels and toxic chemicals and will inevitably lead to further contamination; b) the plastic grass blades will break down from UV radiation, wear and tear, and the elements, and making it a source of micro- and nano-plastic contamination; c) PFAS (or per- and polyfluoroalkyl substances) content of the artificial turf should be tested, as some manufacturers claim their turf is PFAS-free, but this has not been fully supported by independent research; d) water is inadequate to clean body fluid spills (for example blood and vomit, which can carry germs) on artificial turf and would require use of disinfectants, while grass fields deal with pathogens through natural biological activity; and e) studies show that more injuries on artificial turf than natural grass, citing a 2013 study¹ that states:

Clinical studies have indicated that higher injury rates occur on artificial turf than on natural surfaces. This conclusion is backed by robust biomechanical data that suggest that torque and strain may be greater on artificial surfaces than on natural grass. Recent data on professional athletes suggest that elite athletes may sustain injuries at increased rates on the newer surfaces. However, these surfaces remain attractive to athletes and administrators alike because of their durability, relative ease of maintenance, and multiuse potential.

The comment concludes by stating that natural grass fields are safer for children's health and for the environment, as grass cleans the air by removing carbon dioxide.

Regarding the proposed U10 field size, the District previously discussed the Proposed Project with the City, and the City concurred with the proposed U10 field, which is a youth soccer field-sized, with dimensions of approximately 188 feet in length by approximately 130 feet in width (not subtracting the radius corners and excluding the synthetic turf walking track), or an estimated 24,440 square feet in size. The proposed field would allow for the continued school's physical education activities and play uses. Further, the Franklin Elementary School campus is small, based on California Department of Education standards. The smaller U-10 field would serve the school's and community's needs, while a U-12 field (which is substantially larger) would make it difficult to accommodate the rest of the intended program for the campus.

With respect to the commenter's concern regarding potential toxic materials and contamination from artificial turf (a), As discussed in the manufacturer's information (see Attachment A), the artificial turf is made from polypropylene (which are used in everyday items such as face masks, yoga pants, and yogurt containers), polyethylene (which are commonly used in water bottles and everyday packaging), polyester (used in food

¹ Drakos MC, Taylor SA, Fabricant PD, Haleem AM. Synthetic Playing Surfaces and Athlete Health. J Am Acad Orthop Surg. 2013 May; 21(5):293-302. doi: 10.5435/JAAOS-21-05-293. PMID: 23637148.

packaging, medical equipment, and athletic wear), and polyurethane (used in footwear to replace leather), and does not contain hazardous or toxic materials, including heavy metals. Additionally, comments provided pertain to crumb rubber infill; the District has moved away from use of crumb rubber infill, and instead utilizes natural cork infill, as the crumb rubber infill has the potential to enter the storm drain system and flow into downstream waters. Further, synthetic turf has no need for use of pesticides or fertilizers, which can harm soil health and result in stormwater pollution.

Regarding the commenter's concern that plastic grass blades will break down from UV radiation and use, leading to release of micro- and nano-plastics (b), the District is cognizant of the lifespan of synthetic turf fields, and if it is deteriorating, then it is time for the field to be replaced.

With respect to the commenter's concern regarding PFAS (c), while prior generations of artificial turf (as well as other everyday materials) contain PFAS, the industry has continued to evolve since the introduction of AstroTurf in the 1960s. As provided in the manufacturer's information (see Attachment A), the proposed synthetic turf is designed without PFAS. The current grass fields in Santa Monica have trace amounts of PFAS. PFAS is also found in dental floss and athletic sportswear. The proposed new turf at Franklin Elementary School would have no PFAS chemicals.

Regarding the commenter's concern that water is inadequate to clean body fluid spills (d), all fields have the potential for contamination from saliva, blood, sweat and vomit. Dilution with water is the best immediate remediation on both grass and synthetic turf fields, and humidity levels and sunshine in Santa Monica further helps with the natural breakdown of organic matter. The District uses a non-toxic disinfectant spot cleaner, when needed.

With response to the commenter's concern regarding injuries on artificial turf (e), it should be noted that the cited research is dated 2013 and studied artificial turf products used more than a decade ago and does not take into consideration industry improvements and present-day products. Also, one important context to consider is the current overplayed field at the school campus where there are some areas with grass, but others that are muddy, and still other areas that are packed earth with no grass, which are hard. Injuries occur due to uneven surfaces, and are not safe playable surfaces. A grass field should have no more than four hours of heavy play a day and should be rested up to three months a year (up to 1,095 hours/year). A synthetic turf field can be played all day, 365 days per year (up to 5,110 hours/year). For a school playfield where students need more opportunities to be active, the synthetic turf fields provide that opportunity. Regarding concerns of injuries due to heat on artificial turf, the District uses synthetic turf materials that do not heat up as much as prior generations of artificial turf. Given the coastal climate in Santa Monica where temperatures rarely exceed 90 degrees, the temperatures measured for existing synthetic turf fields on other District campuses never exceed ten degrees over a similar grass field. The synthetic turf currently installed at the District's other campuses reduces hot temps by up to 20 degrees over earlier versions of turf fields, and by way of comparison the blue field at Santa Monica High School registers less than 1 degree warmer than the green civic center field.

Further, the synthetic turf would conserve water, and without the need for mowing, would avoid emissions, including carbon dioxide, associated with mowers and other fuel-powered equipment, and with no grass clippings, also reduces a major component of landfilled municipal solid waste. As provided in the manufacturer's information (Attachment A), the synthetic turf is 100 percent recyclable, thereby reducing landfill waste. Additionally, balanced with considerations for maintenance requirements, the synthetic turf field would provide greater safety and protected play opportunities for students than would a grass turf field.

This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND. All comments will be considered by the District's Board of Education in evaluating whether to adopt the IS/MND and approve the Project as proposed.

- I6-2 This comment asserts that the proposed Maker Space should be removed from the Proposed Project and that the land should instead be used for open space since classrooms are Maker Spaces. As described in Section 2, Project Information, and Section 4.11, Land Use and Planning, of the Proposed Project IS/MND, the school campus is zoned Public Lands (PL) which is intended for public or semi-public facilities, including municipal offices, schools, libraries, museums, performance spaces, cemeteries, corporation yards, utility stations, and similar uses. As described in Section 3, Project Description of the Proposed Project IS/MND, the Maker Space is designed to provide flexible uses for science laboratory, art studio, and other creative and collaborative project work that would not be readily undertaken in the classroom setting. The Maker Space is aligned with the SMMUSD Board of Education's adopted the 2019 Districtwide Educational Specifications (Educational Specifications), which provide guidance on developing future learning environments to support new developments in technology and the expectations of the twenty-first-century workforce, and includes a shift from traditional instruction styles to a one that incorporates a variety of project-based learning experiences that allow for individualized, small group, and large group instruction to occur simultaneously. The Maker Space would provide a learning space 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. This comment does not raise an environmental issue of concern relative to CEQA nor does it relate to the adequacy of the IS/MND. All comments will be considered by the District's Board of Education in evaluating whether to adopt the IS/MND and approve the Project as proposed.
- I6-3 This comment states that the community comment process for the Proposed Project has been inadequate and should be extended. The IS/MND prepared for the Proposed Project is subjected to the public review and notification requirements under CEQA Guidelines §15072. In compliance with §15072(a) the District distributed a notice of intent (NOI) to adopt a mitigated negative declaration to the public and responsible agencies at the start of the 30-day public review period and filed the NOI with the county clerk on March 7, 2025 (start of the public review period). The Draft IS/MND and NOI were also filed with the California State Clearinghouse on March 9, 2025. The public review period was also extended by two days, from March 7 to April 9, 2025, for a total of 32 days.

The District mailed the NOI to all organizations and individuals who have previously required such notice, mailed the NOI to the owners and occupants of property within 500 feet of the Proposed Project site, and published notice of the Proposed Project and public review period in a local newspaper publication, thereby exceeding notification requirements under §15072(b).

While not mandatory, the District held a community meeting on Tuesday, March 18, 2025 at the Franklin Elementary School Auditorium to explain the Proposed Project and provide a summary of the CEQA environmental impact analysis to the public and facilitate review and comment on the Draft IS/MND. While not required, District representatives also attended the Northeast Neighbors community meeting on April 7, 2025, presented the Proposed Project and summary of the CEQA impact findings, and extended the comment period to the Northeast Neighbors community members on April 16, 2025. Prior to the April 7, 2025 meeting, the District had met with the Northeast Neighbors several times over the course of the Proposed Project's planning and environmental study period from 2022 through 2025.

Furthermore, the District conducted further outreach and noticing of the Draft IS/MND review period, including releasing press releases, providing additional noticing for the community meeting held on March 18, 2025 on flyers, the District social media pages (Instagram, LinkedIn, X, and Facebook Apps), ParentSquare bulletin, PeachJar app (digital flyer distribution program), Wave March, and on the District's website. See Attachment B, which provides documentation of these notices.

In summary, not only did the District comply the notification procedures required under CEQA, but also proactively exceeded the public noticing requirements and extended the public review period. This comment does not raise any additional or new issues of concern relating to the proper administration and notifications required under CEQA nor does it require any revisions to the IS/MND. All comments will be considered by the District's Board of Education in evaluating whether to adopt the IS/MND and approve the Project as proposed.

17. Caron Block, Letter dated April 8, 2025.

From: [REDACTED]
To: [Upton, Caron](#)
Subject: Franklin Elementary School
Date: Tuesday, April 8, 2025 9:09:35 PM

Dear Mr. Upton,

I am writing as both a neighbor and a parent whose children attended Franklin, to express my concern regarding the potential installation or continued use of artificial grass at our grammar school. While synthetic turf may seem like a low-maintenance and visually appealing solution, it poses several risks that make it unsuitable for an educational environment and our neighborhood

First, artificial grass can reach dangerously high temperatures in direct sunlight, often far exceeding the ambient air temperature. This presents a safety risk for students engaging in physical activities or simply spending time outdoors during break times.

Additionally, the surface does not provide the same cushioning as natural grass, increasing the likelihood of injuries from falls. There are also environmental considerations: artificial turf is made from plastic, which contributes to microplastic pollution, does not support biodiversity, and requires eventual disposal in landfills. Microplastics can also be released in the ground and possibly then ground water.

From a health perspective, some synthetic turf products contain chemicals and heavy metals that may pose long-term risks, especially with repeated exposure.

Our school grounds should reflect a commitment to student health, sustainability, and safety. For these reasons, I strongly urge the school to prioritize natural, eco-friendly alternatives over artificial grass.

Very Truly Yours,
Caron Block
716 26th St.
Santa Monica, Ca. 90402

17-1

I7. Responses to Comments from Caron Block, Letter dated April 8, 2025.

- I7-1 The commenter, who is a neighbor and parent whose children previously attended Franklin Elementary School, expresses concern regarding the proposed installation or continued use of artificial grass at the school campus. The commenter identifies several risks relating to artificial turf reaching high temperatures, fall injuries, microplastic pollution, lack of support of biodiversity, disposal in landfills, and harmful chemicals. As discussed in the Proposed Project's IS/MND, the school campus is fully developed and does not support sensitive biological habitats or species. The remainder of the commenter's concerns regarding student health, sustainability, and safety are addressed in Response to Comment I6-1. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

18. Jill Chaplin, Letter dated April 8, 2025.

From: [Jill Chaplin](#)
To: [Kean, Jon](#); [Upton, Carey](#); [Leon-Vazquez, Maria](#); [Lieberman, Laurie](#); [Mignano, Alicia](#); [Rouse, Stacy](#); [Smith, Jennifer](#); rtahvildararjesswein@smmusd.org
Subject: Artificial turf on our school campuses
Date: Tuesday, April 8, 2025 12:34:08 PM

Why do we continue to collect data about the danger of kids playing on these synthetic turfs, while we continue to allow our children to be put in harm's way?

I would normally find it appalling that parents aren't flooding our school board in outrage, demanding that they should be the firewall protecting our children. But I realize that parents must think that if the school board supports this turf, then things likely aren't dire enough to warrant their removal.

But they would be wrong. We only have to look at the European Union to see how other societies actually work for the common good to protect their children.

The EU has banned the sale of products containing intentionally added microplastics, including CRUMB RUBBER infill, used in artificial turf. Crumb Rubber is a known carcinogen our kids are inhaling, getting in their eyes, mouth and skin abrasions. But the EU doesn't ban synthetic turf itself, and use on school campuses remains permitted.

How can this be? Well, they focus on the Infill, not the turf. While they ban crumb rubber infill, they use alternative infills such as coconut fiber and sand as alternatives to crumb rubber.

The way the United States always seems to deal with life threatening additives to things such as turf, or foods or drugs – is to analyze it to death. But in this case, no more analysis is necessary. Crumb rubber is a carcinogen, end of story, period.

While the EU doesn't disparage analysis per se, what they do is to simultaneously analyze AND REMOVE the suspect carcinogens until further evidence is accumulated as to whether something is safe or not. The EU describes our method of looking out for the welfare of our citizens while actually doing nothing as Paralysis by Analysis.

Sadly, that's exactly what is happening regarding the artificial turf on

18-1

our school grounds, and this is just another reason why we are the sickest industrial nation in the world.

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con't

Jill Chapin

I've lived in Santa Monica for 50 years, put a daughter through our schools, and have worked for fifteen years at Lincoln Middle School, and have been a volunteer reader at Mckinley for over two decades.

18-2

I8. Responses to Comments from Jill Chaplin, Letter dated April 8, 2025.

- I8-1 This commenter is concerned with the danger of kids playing on synthetic turf, specifying crumb rubber as a carcinogen used in the infill. The commenter's concerns regarding crumb rubber as well as any other hazardous and toxic materials associated with artificial turf are addressed in Response to Comment I6-1. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND. All comments will be considered by the District's Board of Education in evaluating whether to adopt the IS/MND and approve the Project as proposed.
- I8-2 The commenter states their residency in Santa Monica, has a daughter who was a student in the District schools, worked at Lincoln Middle School, and has been a volunteer reader at another SMMUSD school for over two decades. This comment does not raise an environmental issue of concern relative to CEQA nor does it relate to the adequacy of the IS/MND.

I9. Raymond and Nadina Johnson, Letter dated April 8, 2025.

From: [Ray and Dina Johnson](#)
To: [Upton, Carey](#)
Subject: Franklin field
Date: Tuesday, April 8, 2025 5:36:30 PM

Artificial grass is evil and ugly. The concrete underneath the plastic is hard. Ask any pro football player. The grass gets dirty and requires certain type of maintenance. Precipitation does not go through properly. Please do not do it. | 19-1

Raymond and Nadina Johnson, former Franklin parents.

I9. Responses to Comment from Raymond and Nadina Johnson, Letter dated April 8, 2025.

- I9-1 The commenters state that artificial grass is evil and ugly, the concrete beneath the plastic is hard, the grass gets dirty and requires certain types of maintenance, and precipitation does not permeate artificial turf. The proposed synthetic turf is designed to resemble grass. The commenter's concerns regarding the infill materials and maintenance are addressed in Response to Comment I6-1. Artificial turf is designed to be permeable, and the campus surface hydrology would be designed in accordance with the City's code and would not change the existing flow pattern, as addressed in Section 4.10, Hydrology and Water Quality of the Proposed Project's IS/MND. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

I10. Bhakti Mehta, Letter dated April 8, 2025.

From: [Bhakti Mehta](#)
To: [Upton, Carey](#); [chintan](#)
Subject: Franklin playground
Date: Tuesday, April 8, 2025 8:03:25 PM

Hello Mr Upton,

Our son is in the Kinder class at Franklin & we expect to be a Franklin family for many years to come.

We want to strongly urge you to reconsider decreasing the size of the Franklin field & installing turf. The field is beloved & always in use, even on the weekends. Artificial turf gets hot, is made of potentially toxic materials, and takes away the biodiversity that exists in grass / clover covered field. It has to be hosed down regularly, so there isn't even any water savings.

I know we speak for many families who want to preserve both the size & the real grass of the Franklin field, because it provides joy to many.

Sincerely,
Bhakti Mehta

I10-1

I10. Response to Comment from Bhakti Mehta, Letter dated April 8, 2025.

- I10-1 The commenter states that their child is a kindergarten student at Franklin and they expect to be a Franklin family for many years. The commenter strongly urges the District to reconsider decreasing the size of the playfield and installing synthetic turf, stating that the artificial turf gets too hot, contains toxic materials, removes biodiversity, and would not result in water conservation. The commenter's concerns regarding the size of the playfield, synthetic turf temperatures, toxic materials associated with artificial turf, and water conservation are addressed in Response to Comment I6-1. As discussed in the Proposed Project's IS/MND, the school campus is fully developed and does not support sensitive biological habitats or species. This comment does not raise any additional or new issues of concern relating to the proper administration and notifications required under CEQA nor does it require any revisions to the IS/MND.

I11. Gelfand Family, Letter dated April 8, 2025.

From: [REDACTED]
To: [Upton, Carey](#)
Cc: [Roman Gelfand](#)
Subject: Franklin School Plan
Date: Tuesday, April 8, 2025 8:23:33 PM

Hello,

Our son will be starting Kindergarten at Franklin this August. We live in the Northeast neighborhood and often visit the Franklin playground on weekends.

We are strongly opposed to the installation of synthetic turf as a replacement for any of the current grass field areas. The potential health risks, especially for young children, are deeply concerning to us.

We respectfully urge you to preserve the natural grass fields as they are.

Thank you for your attention to this important matter.

Warm regards,

The Gelfand Family

I11-1

I11. Response to Comment from Gelfand Family, Letter dated April 8, 2025.

- I11-1 The commenter states that their son will be starting Kindergarten at Franklin Elementary School this year and they are strongly opposed to the proposed installation of synthetic turf due to potential health risks associated with the turf. The commenter's concerns relating to possible health risks are addressed in Response to Comment I6-1. This comment does not raise any additional or new issues of concern relating to the proper administration and notifications required under CEQA nor does it require any revisions to the IS/MND.

I12. Sue, George, and Elizabeth Ferrell, Letter dated April 8, 2025.

From: [George Ferrell](#)
To: [Upton, Carey](#)
Subject: Franklin School Plan
Date: Tuesday, April 8, 2025 10:26:54 PM

Please reconsider the plan to install synthetic turf at Franklin School and either reject that part of the plan or delay the decision until more study can be done. Also, please read the research literature on the health hazards of playing on plastic turf. More study is needed. Our children are too precious to ignore this danger.

I12-1

Sue Ferrell
George Ferrell
Elizabeth Ferrell
338 15th Street

I12. Response to Comment from Sue, George, and Elizabeth Ferrell, Letter dated April 8, 2025.

- I12-1 The commenters are concerned with the health hazards of playing on plastic turf and states that more studies are needed. The commenters' concerns relating to possible health risks of the proposed synthetic turf, as well as clarifications on the proposed design are addressed in Response to Comment I6-1. This comment does not raise any additional or new issues of concern relating to the proper administration and notifications required under CEQA nor does it require any revisions to the IS/MND.

I13. Joan Moschovakis, Letter dated April 8, 2025.

From: [Joan Moschovakis](#)
To: [Upton, Carey](#)
Subject: Franklin School project
Date: Wednesday, April 9, 2025 1:12:46 AM

To the SMMUSD:

We moved here from the smoggy east side because Santa Monica had excellent public schools and healthy air, and our children were educated at Franklin, Lincoln and SAMOHI. We appreciated the period architecture of most of the permanent school buildings. We took our kids to the Franklin playground on weekends, and over the years we have enjoyed seeing and hearing other people's children playing in the schoolyards.

I was surprised to learn that SMMUSD is contemplating replacing Franklin's natural grass soccer fields with artificial turf, which is simply bad for the environment -- and particularly bad for the health of children. Natural surfaces are cooler and cleaner and safer, especially for young children. Rain washes dust and germs from grass into the ground and feeds the aquifer. Artificial turf is hotter than asphalt in the sun.

The small Franklin native plant garden on Montana is a step in the right direction. Not so much grass is needed in front of the school, but the soccer fields should be grass for the health of the children.

With real concern,

Joan Moschovakis
721 24th Street

I13-1

I13. Response to Comment from Joan Moschovakis, Letter dated April 8, 2025.

- I13-1 The commenter expresses their enjoyment of Franklin Elementary School's playground and schoolyard over the years and is concerned regarding the proposed synthetic turf, stating that it is bad for the environment, bad for the health of the children, would not allow water infiltration, and is hotter than asphalt. The commenter's concerns relating to negative effects to the environment and health are addressed in Response to Comment I6-1. Artificial turf is designed to be permeable, and the campus surface hydrology would be designed in accordance with the City's code and would not change the existing flow pattern, as addressed in Section 4.10, Hydrology and Water Quality of the Proposed Project's IS/MND. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

114. Gary Freedman, Esq., Letter dated April 8, 2025.

From: [Gary Freedman](#)
To: [Upton, Carey](#)
Subject: Franklin sports field
Date: Tuesday, April 8, 2025 6:37:17 PM

To whom it may concern

Unfortunately, the city of Santa Monica has no shortage of bad ideas. And replacing grass with synthetic surfaces falls into that group.

Amongst the reasons to keep natural grass is that it removes carbon dioxide through photosynthesis and sequesters it in the ground creating healthier soil.

Synthetic turf is bad for the soil it covers and is a more dangerous playing surface.

Please do not move forward with another bad idea.

My grandson is a Franklin student.

Sincerely

Gary Freedman
533 9th Street

114-1



I14. Response to Comment from Gary Freedman, Esq., Letter dated April 8, 2025.

- I14-1 The commenter states that the City's replacement of grass with synthetic surfaces is a bad idea, and states that natural grass would remove carbon dioxide and would sequester it in the ground, and would cover the soil and also create a more dangerous playing surface. To clarify, Franklin Elementary School is managed by the District, not the City, and therefore the District is proposing the campus plan improvements to the school. The commenter's concerns regarding carbon dioxide and possible dangerous conditions are addressed in Response to Comment I6-1. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

I15. Spielman, Letter dated April 8, 2025.

From: [Spielman](#)
To: [Upton, Carey](#)
Subject: Please Keep Real Grass @ all schools and parks in Santa Monica
Date: Tuesday, April 8, 2025 6:37:12 PM

Please Keep Real Grass @ all schools and parks in Santa Monica

| I15-1

I15. Response to Comment from Spielman, Letter dated April 8, 2025.

- I15-1 The commenter requests to keep real grass at all schools and parks in Santa Monica. To clarify, Franklin Elementary School, as well as other schools within the SMMUSD areas are managed by the school district, SMMUSD, not the City, and the City, not the District, has jurisdiction over City parks. This comment does not raise any additional or new environmental issues of concern relative to CEQA.

I16. Audrey Bly, Letter dated April 8, 2025.

From: [Audrey Bly](#)
To: [Upton, Carey](#)
Subject: reconsider the plan for the Franklin elementary school field
Date: Tuesday, April 8, 2025 8:39:34 PM

Hi Carey,

I'm writing to ask you and all involved to reconsider the use of artificial turf on the proposed new field at Franklin Elementary. None of us needs more carcinogenic or plastic exposure than we already have. Please use grass instead - it's healthier and more hygienic in the long run. Please also reconsider the size of the field. The proposed field is too small and the size of the current field should continue with the new plans.

I16-1

Franklin is a large school and the kids need more space to run and play ..not less. These field is used on weekend by the community as well outside of school hours. It would be a real shame to reduce the space for sports and recreation.

Thank you from a Franklin parent,

Sincerely,

Audrey Bly

I16. Response to Comment from Audrey Bly, Letter dated April 8, 2025.

- I16-1 The commenter expresses concern regarding proposed synthetic turf with respect to carcinogens, plastics, and hygiene, and requests that the size of the field should not be reduced. These topic areas and clarifications are addressed in Response to Comment I6-1. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

117. Karen Freedman, Letter dated April 9, 2025.

From: Karen Freedman [REDACTED]
Sent: Wednesday, April 9, 2025 3:40 PM
To: Upton, Carey
Subject: Opposition to the use of synthetic turf at Franklin Elementary School

Dear Mr. Upton,

As a resident of Santa Monica, a former SMMUSD student and parent of a current Franklin Elementary School student, I am concerned, disappointed and outraged to hear of your plans to use synthetic turf at Franklin Elementary School. The health risks you would be imposing on our children is irresponsible and reckless; and will potentially open the district up to several lawsuits. When heated the fake grass becomes so hot that children playing on it risk getting burns. When wet, the synthetic turf is slippery and poses a risk to injuries from slipping and falling. Further, the synthetic turf releases toxins into the air that are dangerous to students, teachers and staff and detrimental to the environment. Soil sitting under the synthetic turf is unable to breathe and therefore will die along with all the healthy microbes that live on it. Synthetic turf does not allow CO2 to be released into the air. The negative implications are far too many to list them all here.

117-1

I urge you to remove synthetic turf from your plans. I have tried to be an advocate and supporter of the renovation plans but will no longer do so should synthetic turf be used.

Thank you in advance for your attention to this email.

Sincerely,

Karen Freedman
Sent from my iPhone

I17. Response to Comment from Karen Freedman, Letter dated April 9, 2025.

- I17-1 The commenter expresses concern regarding the proposed synthetic turf with respect to elevated temperatures of the turf, release of toxins, its detriment to the environment, soil health, and its inability to allow release of CO₂ to the air. The commenter's concerns regarding elevated temperatures and toxins are addressed and clarified in Response to Comment I6-1. As stated in Response to Comment I6-1, the existing playfield is overplayed, with areas of muddy or compacted soil. The playfield is used for both Franklin Elementary School students and community uses to support physical education and play. Installation of the new turf field will allow the District to provide both the students and the community a safer and more equitable play area as the turf field will not result in areas of muddy or compacted soils, and can be used 365 days a year. The commenter provides no evidence that carbon dioxide would be trapped under the synthetic turf. To the contrary, the synthetic turf is permeable to allow water to flow through it and any carbon dioxide to escape. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

I18. Judah Carrillo, Letter dated April 9, 2025.

From: Karen Freedman [REDACTED]
Sent: Wednesday, April 9, 2025 3:25 PM
To: Upton, Carey; Shelton, Antonio
Subject: Letter in opposition to the use of synthetic turf at Franklin Elementary School

THE BELOW LETTER WAS DICTATED TO AND TRANSCRIBED BY THE MOTHER OF A 4th GRADE STUDENT AT FRANKLIN ELEMENTARY SCHOOL. NO EDITS TO THE STUDENT'S WORDS WERE MADE TO PROTECT THE INTEGRITY OF THE STUDENT'S THOUGHTS AND FEELINGS IN OPPOSITION TO THE USE OF SYNTHETIC TURF AT FRANKLIN ELEMENTARY SCHOOL.

[Dear Mr. Upton and Dr. Shelton,]

This letter is about the use of fake grass at Franklin. Fake grass is not a good idea. If somebody falls on it while playing they could scrape themselves. The plastic gets hot and then it's too hard to play on it. It releases a terrible smell and toxins- even more poison when it's hot. Finally, it kills the soil underneath it. People like to work in the garden at school and this goes against everything we have done to help the earth with the gardening, composting and recycling.

I18-1

Thank you,

Judah Carrillo
4th Grade Student
Franklin Elementary School
Sent from my iPhone

I18. Response to Comment from Judah Carrillo, Letter dated April 9, 2025.

I18-1 The commenter is currently a 4th grade student at Franklin Elementary School, and expresses concern regarding the proposed synthetic turf, specifying that it may cause injury from scrapes, releases a terrible smell and toxins, and kills the underlying soil. The commenter's concerns regarding injuries from the synthetic turf and toxins are addressed and clarified in Response to Comment I6-1. As stated in Response to Comment I6-1, the existing playfield is overplayed, with areas of muddy or compacted soil; the athletic field is used for both Franklin Elementary School students and community uses to support physical education and play, while gardening and composting efforts are provided at the on-campus gardens. This comment does not raise any additional or new environmental issues of concern relative to CEQA nor does it require any revisions to the IS/MND.

I19. Nikki Kolhoff, Letter dated April 9, 2025.

From: Nikki Kolhoff <[REDACTED]>
 Sent: Wednesday, April 9, 2025 2:55 PM
 To: Upton, Carey <cupton@smmusd.org>
 Subject: Franklin Elementary Mitigated Negative Declaration - OPPOSE with Comments

Dear Carey Upton -

I am writing to ask for a rejection of the Mitigated Negative Declaration and the commencement of a full environmental impact report on the Franklin Campus Plan. The current plan results in the following significant impacts under CEQA that are not mitigated:

- **Air Quality** - Construction impact by rebuilding the entire campus over at least a decade. I19-2
- **Cultural Resources** - The new 2-story building crowds out the historic administration building and should be moved back, leaving a front lawn that is also a historically used neighborhood gathering spot. I19-3
- **Hazards & Hazardous Materials** - The removal of grass and use of artificial turf puts our students at risk from chemicals in the turf and the district's failure to follow cleaning protocols for the turf. I19-4
- **Hydrology/Water Quality** - Removal of grass and replacement with artificial turf reduces the ability to filter groundwater. I19-5
- **Land Use/Planning** - The Joint Use Agreements between SMMUSD and Santa Monica declare that our schools are considered public parks because our city doesn't have enough park and recreational space, and that our city is built out so the creation of new parks and recreational facilities is limited. Under the Joint Use Agreement, the school district is required to make the facilities, including the Franklin field available for public use in exchange for funds from the city. If the Franklin field is reduced by half, the city's obligation to continue paying the school district must be analyzed and confirmed in writing. We aren't aware of any written assurances from the city that they will not reduce the payment if the Franklin field (and all of the other elementary school fields in Santa Monica) is reduced by half. Absent a written assurance, the reduction of the field and playground space puts district funding at risk. I19-6
- **Noise** - Construction impact by rebuilding the entire campus over at least a decade. I19-7
- **Public Services** - The reduction of field space means there is significantly less space for sports programs, after school care, enrichment classes, etc. in a city that the school district has conceded is short on field space. I19-8
- **Recreation** - The reduction of field space by half means there is less space for city-wide sports programs and a smaller "public park" for the neighborhood, and the city as a whole, when the campus is available for public use. Again, this is in a city that the school district has conceded is short on field space. I19-9
- **Transportation/Traffic** - The construction will impact access for drop-off/pickup. Construction trucks will be coming through the neighborhood. Where will workers park? I19-10

Regards,
 Nikki Kolhoff

I19. Response to Comment from Sue, George, and Elizabeth Ferrell, Letter dated April 8, 2025.

- I19-1 The commenter asserts that the IS/MND prepared for the Proposed Project does not mitigate significant impacts listed in the commenter letter, and that the District prepare an environmental impact report. This comment introduces the commenter's concerns but does not provide environmental issues of concern relative to CEQA. No further response is required.
- I19-2 The commenter states that air quality construction impacts would occur for at least a decade. As analyzed in Section 4.3, Air Quality, of the IS/MND, the Proposed Project's construction air quality effects from each proposed phase of the campus plan were modeled in accordance with methodology required by the South Coast Air Quality Management District, and emission levels were found to be well below criteria pollutant thresholds, as reported in Table 4.3-2 of the IS/MND. As a result, construction air quality impacts were found to be less than significant and no mitigation is required. Refer also to response to comment I5-2 regarding the length and timing of proposed construction activities. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.
- I19-3 The commenter states that the proposed 2-story building would crowd out the historic administration building and the front lawn. The proposed location of the 2-story building is the same location as an existing classroom building with a similar building footprint. As shown on Figures 4.1-1A and 4.1-1B of the IS/MND, which show the existing and simulated views of the campus including views of the administration building, the proposed 2-story building would not visually crowd out the administration building. The effects of the proposed campus plan improvements with respect to the historic administration building are further analyzed in the historic resource evaluation, provided as Attachment C, which concludes that the administration building would retain its eligibility as a historical resource, and the Proposed Project impacts would be less than significant. As a result, no mitigation is warranted. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.
- I19-4 This comment states that removal of grass and use of artificial turf puts the students at risk from chemicals and that the District fails at following cleaning protocols. The commenter's concerns regarding the hazardous materials and maintenance are addressed and clarified in Response to Comment I6-1. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.
- I19-5 This comment states that removal of grass and replacement with artificial turf reduces the ability to filter groundwater. Artificial turf is designed to be permeable, and the campus surface hydrology would be designed in accordance with the City's code and would not change the existing flow pattern, as addressed in Section 4.10, Hydrology and Water Quality of the Proposed Project's IS/MND. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.

- I19-6 This comment refers to the Joint Use Agreement between SMMUSD and the City and states that the Agreement declares schools as public parks. The commenter is concerned that, with reduction of the athletic field size, the City's obligation to continue paying the District should be analyzed. The District has informed the City of the Proposed Project including the development of a U10 turf field to replace the grass field, and the City has concurred that a U10 field is appropriate for Franklin Elementary School. Further, this topic area is outside of the scope of CEQA and does not pertain to the adequacy of the IS/MND prepared for the Proposed Project. This comment does not raise any CEQA-related issues nor does it require any revisions to the IS/MND.
- I19-7 This comment states that construction noise will occur over at least a decade. The Proposed Project's construction noise was modeled and analyzed in the IS/MND, with the results summarized in Table 4.13-4 of the IS/MND. As analyzed, the Proposed Project's construction noise levels would not exceed adopted noise thresholds, and impacts would be less than significant. While not required, the District still proposed to implement noise mitigation (NOI-1) entailing adherence to a construction noise control plan that incorporates best management practices during construction to further reduce noise nuisances to the extent feasible. Refer also to response to comment I5-2 regarding the length and timing of proposed construction activities. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.
- I19-8 This comment states that the reduction of field space means there is significantly less space for sports programs, after school care, enrichment classes, etc. As discussed in Response to Comment I6-1, the proposed U10 field, which is youth soccer field-sized with the dimensions of approximately 188 feet in length by approximately 130 feet in width (not subtracting the radius corners and excluding the synthetic turf walking track), or an estimated 24,440 square feet in size, and would still allow for the school's existing programming and uses. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.
- I19-9 This comment states that the reduction of field space by half means there is less space for city-wide sports programs and a smaller public park for the neighborhood.
- The existing playfield measures an estimated 42,350 square feet in size (approximately 266 feet in length by approximately 159 feet in width, not subtracting the radius corners and excluding the dirt walking track). In comparison, the proposed playfield would measure approximately 24,440 square feet in size. Therefore, the Proposed Project would reduce the size of the playfield by approximately 17,910 square feet, or 42 percent. However, this reduced size will not reduce school and community use. The existing field was single use only and never supported two uses at a time. Further, the single uses of the existing field would be accommodated by the new field. As stated above, the proposed sports field would allow for school athletic programs to continue, and as analyzed in the Proposed Project's IS/MND, the District would continue to allow public use of the sports field. No existing uses of the current field would be prohibited by the

new field. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND.

119-10 This comment states that construction will impact access for drop-off/pick-up and that construction traffic would be coming through the neighborhood. Additionally, the comment also asks where the workers would park. The Proposed Project's IS/MND analyzes transportation impacts in Section 4.17, Transportation, and identifies that haul trucks and equipment deliveries to and from the Proposed Project's site throughout the day may increase hazards. Therefore, the IS/MND identifies mitigation measure TR-1, requiring the District to implement a Construction Traffic Control Plan, with a number of measures to minimize hazards through industry-accepted traffic control practices. The following is an excerpted partial list of the practices included in the mitigation measure TR-1, which also address minimizing construction traffic through the neighborhood and coordinating pick-up/drop off areas:

- *Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if deliveries could preclude free flow of traffic in both directions or cause a temporary traffic hazard; prohibit deliveries of heavy equipment and construction materials during periods of heavy traffic flow (i.e., 30 minutes before or after school start and end times);*
 - *Develop a Traffic Education Program to educate parents, students, and staff on drop-off/pickup procedures specific to each phase of construction, which includes informational materials regarding student drop-off and pickup procedures via regular parent/school communication methods and posted on the school website;*
 - *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;*
- ...

Construction personnel would park on available onsite spaces and in areas allow public parking near the school. This comment does not raise any additional or new issues of concern relating to environmental issue areas under CEQA nor does it require any revisions to the IS/MND. All comments will be considered by the District's Board of Education in evaluating whether to adopt the IS/MND and approve the Project as proposed.

In summary, none of the comments from this letter identify significant impacts that were not already identified in the Proposed Project's IS/MND, nor do the comments demonstrate that mitigation measures identified in the IS/MND are unable to reduce significant impacts to less than significant levels. As a result, no additional studies nor an environmental impact report would be warranted.

I20. Corinne Koutsouros, Email dated April 9, 2025.

From: Upton, Carey <cupton@smmusd.org>
Sent: Wednesday, April 9, 2025 5:04 PM
To: Corinne Jang; Upton, Carey
Subject: RE: Franklin Field/Campus Phase 1

Ms. Jang,
 Your email did not come in clearly. I was able to recover it. Is this what you intended to send?
 Warmly,
 Carey Upton

Dear Carey Upton and School Board –

I am writing to ask for a full environmental impact report on the Franklin plan because the following significant impacts are not mitigated:

- * Hazards & Hazardous Materials - The removal of grass and use of artificial turf puts our students at risk from chemicals in the turf. The Materials used regardless of rubber or cork filled synthetic turf is harmful. The sun bakes the nylon and polyethylene fibers as well as the backing that has a sealant and glue made from latex and polyester that releases toxic fumes when baked by the sun. We need to keep our air clean inside and outside for our students, faculty and community. I20-1
- * After each use synthetic turf needs to be cleaned using a disinfectant to clean of bodily fluids. What resources do we have when natural grass has the ability to sustain with normal watering and absorption. This leads to more chemicals absorbed through skin contact and inhalation. I20-2
- * Heat from synthetic turf can reach up to 80-90 degrees higher temps than natural grass causing skin burns, aiding in global warming creating a dual baking atmosphere from the ground up. I20-3
- * Synthetic turf if found to aid in injuries up to 16% and higher. Research indicates that artificial turf increases the risk of joint stress and abrasions, making it less forgiving. I20-4
- * Water cannons are suggested by the companies to keep synthetic turf cool and are supposed to shoot water every 20 minutes to maintain a cool temp. The coastal temperature and higher humidity does not create for an ideal turf environment. Just sit The turf in merely 80 degree weather is painful for families; not to mention the kids running up and down the fields in this weather only for the heat to rise from the turf. Turf can reach up to 80-90 degrees higher than natural grass, This will lead exhaustion, heat stroke, causing skin burns, aiding in global warming creating a dual baking atmosphere from the ground up. This will also discourage outdoor play. I20-5
- * Microplastics pollution Airport park soccer synthetic turf field is rapidly deteriorating. As you leave the fields the plastic blades and fill stick to shoes/cleats and anything capable of the most minor static cling. The crumb fill and plastic blades are carried home, washed down the drains and washing machine infiltrating our public water supplies. I20-6
- * PFAS studied for toxicity is associated with adverse health effects ranging from thyroid dysfunction, delayed puberty, obesity, osteoarthritis, liver problems, immune disorders, kidney problems, decreased vaccine response in children, more severe cases of COVID - 19 and cancer, Research also shows human exposure to PFAS can occur through inhalation and ingestion, as well as direct dermal exposure. I20-7
- * Hydrology / Water Quality - Removal of grass and replacement with artificial turf reduces the ability to filter groundwater. You need to install an irrigation system. If you leave the field as it, it is self repairing and has its own irrigation system. I20-8
- * more water will end up being used if the city properly budgets for water cannons to keep fields cool. The price and maintenance of water cannons and rising cost for water use are not rolled into the budget. Not one water cannon exists on any Santa Monica City Artificial turf field. I20-9
- * Land Use / Planning - The Joint Use Agreement declares that our schools are considered public parks because our city doesn't have enough park and recreational space. Under the Joint Use Agreement, the school district is required to make the facilities available for public use in exchange for funds from the city. If the Franklin field is chopped in half, the city's obligation to continue paying the school district must be analyzed and confirmed in writing. We aren't aware I20-10

of any written assurances from the city that they will not reduce the payment if the school field is reduced by half. Absent they, the reduction of the field and playground space puts district funding at risk.

120-11,
ctd.

* Recreation - The reduction of field space means there is less space for city-wide sports programs and a smaller "public park" when the campus is available for public use.

120-12

* Public Services - The reduction of field space means there is less space for sports programs, after school care, enrichment classes, etc.

120-13

* Land Use / Planning - This one is key. The Joint Use Agreement declares that our schools are considered public parks because our city doesn't have enough park and recreational space. Under the Joint Use Agreement, the school district is required to make the facilities available for public use in exchange for funds from the city. If the Franklin field is chopped in half, wouldn't the city be able to reduce payment to the district under the joint use agreement? We aren't aware of any written assurances from the city that this is not the case. The reduction of the field and playground space puts district funding at risk. [The point in the category of land use is there are legal obligations relating to the use.

120-14

* Public Services - Discuss reduction of field space meaning there is less space for sports programs, after school care, enrichment classes, etc.

120-15

* Recreation - Discuss reduction of field space meaning there is less space for city-wide sports programs and a smaller "public park" when the campus is available for public use.

120-16

* Benefits of natural grass boosts immune Health. Exposure to natural grass and soil introduces beneficial microbes that help develop a stronger immune system and reduce allergies.

* It enhances cognitive and emotional well being. Well being studies show that green spaces improve focus, reduce stress and enhance creativity in children,

120-17

* Natural grass provides varied textures, smells and sights which are critical for sensory learning.

* Natural grass improves air quality reducing carbon foot print by absorbing carbon dioxide and producing oxygen

* Natural grass is more sustainable

* Franklin and the community uses the entire field. Kids have to run the current track 6 times to complete a mile.

* the current Physical education program which has been reduced to part time has impacted the physical and mental health of the student who aren't getting enough outdoor space and time.

* mirror the plans where the TK/Kinder classrooms are and build them on the current parking lot. keep the field in the entirety and reduce the cost of construction. Need to see specs and not pretty CADS of building/ field placement.

120-18

* Synthetic turf is high maintenance and expensive debt and toxic poison to burden our community and children with. Right now we are begging to keep out "truffula tree's". As Carey Upton said in his own words "Santa Monica is Field poor". Why reduce the size of a very precious space to only meet minimum requirements. To provide a smaller outdoor multi-use space than we have now to trade for concrete buildings is a detrimental oversight. The emphasis on a Makers Space lacks the imagination that outdoor space is also a great use of Makers Space. Its readily available at the moment and of no cost. Do not touch our fields for the sake of spending money because we have it. Let's be smart with our money. This will free up a lot of the QS money to attack more phases. Once you build on open space....we will never get that open space back.

120-19

Please consider keeping the natural Field untouched in size and in its living form. Moving towards a Synthetic field is detrimental to our physical and mental health.

120-20

Thank you for your time,
Corinne Koutsouros

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
310-450-8338 x79383 w
424-581-5426 m
cupton@smmusd.org

I20. Responses to Comments from Corinne Koutsouros, Email dated April 9, 2025.

- I20-1 The commenter requests that an environmental impact report be prepared for the Proposed Project, indicating that significant impacts (as described in the comment letter) are not mitigated.

Please refer to the responses below for additional discussion.

- I20-2 The commenter states concern over potential risk from chemicals resulting from the proposed removal of grass and use of artificial turf (e.g., toxic fumes), and resulting air quality.

Refer to Response to Comment I6-1.

- I20-3 The comments state that after each use, synthetic turf needs to be cleaned using a disinfectant to clean off bodily fluids, and that natural grass has the “ability to sustain with normal watering and absorption.” See Response to Comment I6-1. The comments imply that the use of artificial turf may lead to more chemicals being absorbed through skin contact and inhalation.

The commenter provides no evidence showing the risk of harmful chemical absorption by skin contact or inhalation. This comment neither identifies a deficiency in the Draft IS/MND’s analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I20-4 The comment states that heat from synthetic turf can result in higher temps than natural grass, causing skin burns and contributing to global warming effects.

Refer to Response to Comment I6-1.

- I20-5 The comment states that synthetic turf may have the potential to result in increased risk of injury.

Refer to Response to Comment I6-1. This comment neither identifies a deficiency in the Draft IS/MND’s analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I20-6 The commenter states concern over potential temperatures that may result with installation of the proposed artificial turf field, contributing to exhaustion, heat stroke, skin burns, and global warming effects, while also discouraging outdoor play.

Refer to Response to Comment I6-1.

- I20-7 The commenter states concern over the use of artificial turf relative to microplastics and the potential for such materials to be carried off-site by users, or to be washed down drains, affecting public water supplies.

Refer to Response to Comment I6-1.

- I20-8 The comment identifies concern for potential exposure to per- and polyfluoroalkyl substances (PFAS) and related toxicity, which may lead to adverse health effects.

Refer to Response to Comment I6-1.

- I20-9 The comment states that removal of grass and replacement with artificial turf may reduce the ability to filter groundwater and recommends installation of an irrigation system. The comments suggest that a natural turf field would be self-repairing and would have an irrigation system.

The proposed installation of an artificial turf field would not substantially contribute to reduced groundwater infiltration in the area because the artificial turf is permeable, allowing water to pass through; such conditions would not cause a significant environmental effect. An irrigation system is not proposed with the planned athletic field improvements.

- I20-10 The comment states concern over water use that may be required if water cannons are used to keep the artificial field cool, along with associated costs.

The District does not anticipate the use of water cannons in maintaining the artificial field over the long term. Refer to Response to Comment I6-1. This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I20-11 The comment states that, under the District's Joint Use Agreement, the District is required to make the Franklin Elementary School's recreational facilities available for public use in exchange for funds from the City. The comment states that a proposed reduction in the size of the athletic field would require evaluation relative to the Joint Use Agreement and required City payments for continued public use.

The economics of a project are not a topic of concern that require evaluation pursuant to CEQA. The District's Joint Use Agreement with the City would remain in place with Proposed Project implementation; no changes to the agreement are anticipated and public use of the school's recreational facilities would continue. Refer to Response to Comment I19-6 regarding the City and District's Joint Use Agreement. This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I20-12 The commenter states that the proposed reduction in athletic field space would result in less space for City-wide sports programs and reduced recreational space available for public use.

Refer to Response to Comment I19-6.

- I20-13 The commenter states that the reduction of field space means there is less space for sports programs, after school care, and enrichment classes.

Refer to Response to Comment I19-6.

- I20-14 The comments provided restate concerns identified in Comment I20-11, above.

Refer to Response to Comment I20-11 and I19-6.

- I20-15 The comment is a repeat of Comment I20-13.

Refer to Response to Comment I20-13.

I20-16 The comment is a repeat of Comment I20-12.

Refer to Response to Comment I20-12.

I20-17 The commenter provides a list of the benefits of natural grass relative to public health, air quality, sustainability, and public recreation.

The comments do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I20-18 The commenter seems to suggest that the proposed Campus Plan should construct the proposed TK/K classrooms where the existing on-site parking lot is currently located. The comments indicate that the existing athletic field should remain in its entirety to reduce the cost of construction. The commenter expresses the desire to see specifications and not illustrative drawings of the campus buildings and the field as proposed.

Figures are provided in Chapter 3.0, Project Description, of the Draft IS/MND (and also the Franklin Elementary School Campus Plan, available under separate cover) that adequately illustrate the improvements proposed for the school campus. Table 3-1, Summary of Existing and Proposed Facilities, of the Draft IS/MND provides specific details of each building proposed, as well as the athletic field (synthetic turf soccer green [U10] and running track).

The comments do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I20-19 The comments indicate concern pertaining to the proposed synthetic turf field, associated maintenance costs, and potential toxins, as well as consideration for the reduced size of the field and provision of "smaller outdoor multi-use space" than occurs under existing conditions. The comments suggest that outdoor space could also be utilized as a Maker Space at a reduced cost in comparison. The comments also suggest not to improve the existing athletic field to save available funding for other improvements and to preserve the available recreational open space available on-site.

Refer to Response to Comment I6-1 pertaining to the proposed athletic field and health concerns; economic costs are not a topic that require evaluation pursuant to CEQA.

Comments provided on the Proposed Project design are acknowledged by the District; however, such comments do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I20-20 The comment requests that the District keep the existing natural athletic field in its current state and location, and states objection to installation of a synthetic field.

Refer to Response to Comment I6-1. This comment is in summary; no further response is required.

I21. Hana Leshner, Email dated April 9, 2025.

From: Hana Leshner [REDACTED]
Sent: Wednesday, April 9, 2025 5:06 PM
To: Upton, Carey <cupton@smmusd.org>
Subject: Franklin Elementary School - Campus Renovation Plan - Comments

Hi Carey,

Thanks so much for taking the time to walk the Northeast Neighbors group through the plan on Monday night. My daughter will be starting in kindergarten at Franklin in the fall, so of course, the plan is of particular interest. Clearly, a lot of studies and planning go into these types of things, and overall I really like the vision for the campus. I wanted to share my comments and a few questions below for consideration. Apologies this is a few minutes past the deadline, but I wanted to make sure I organized my comments and questions clearly.

I21-1

COMMENTS

1. I really like the general aesthetic of the modern architecture with the emphasis on natural materials and natural light. I21-2
2. I like the thinking of the general purpose/maker space in the middle especially the inclusion of the flexible outdoor space as part of that. I21-3
3. I like that the TK classrooms will be built in consideration with needs of four year olds - something new for elementary schools to have to deal with. I21-4
4. My biggest concern is with the installation of a turf field for a number of reasons: I21-5
 - a. The current overall footprint balance of green space and vegetation to built environment isn't great and is going in the wrong direction by removing the natural grass field. This plan takes a huge portion of the green space away. A turf field is a recreational area, but it's not vegetation. I21-5, ctd.
 - b. Turf fields shed plastic grass blades which end up everywhere (in my house, in the ocean, in our drinking water, etc.) We are part of a coastal watershed and we sit above our own ground water supply. We should not be installing plastic and microplastic shedding surfaces ever. I21-6
 - c. Turf fields have been documented to cause more non-contact injuries - for this reason, professional sports players associations do not prefer them. They are less safe than grass. I21-7
 - d. Turf fields are just plain uncomfortably hot when the weather is hot. It's a safety issue it's a city/neighborhood temperature issue. I21-8
 - e. I'm glad there's a consideration of not using recycled tire infill and maybe newer types of plastics, but there's no escaping off-gassing (which will happen again when it's hot). I21-9

QUESTIONS

1. I didn't see this mentioned in the plan, but maybe it's too early, but I'm assuming there will be planned air filtration systems to handle future severe wildfire events. Can you confirm? Sadly, I think we know this will be in our future. I21-10
2. I didn't see any mention of student maintained gardening areas or vegetable garden, is this part of the plan? I think currently there are raised planters for this. I21-11
3. Has the district explored any of the new technologies for sports fields that allow for natural grass and use water recycling. It can be an economical way to maintain sports facilities while also managing drainage and flooding issues. For my job I cover climate technology and we covered this company a few years ago who focuses on this. - [Field Factors](#). I21-12

Thanks!

Best,
 Hana Leshner
 [REDACTED]

I21. Responses to Comments from Hana Leshner, Email dated April 9, 2025.

I21-1 The comments provided acknowledges the studies and planning undertaken for the Proposed Project and indicate support for the vision of the Campus Plan. Additional issues are identified in subsequent comments.

The comments provided are introductory and do not raise an environmental issue of concern relative to CEQA. No further response is required.

I21-2 The comments state support for the general aesthetics of the proposed Campus Plan and building design.

The comments provided do not raise an environmental issue of concern relative to CEQA. No further response is required.

I21-3 The comments state support for the proposed general purpose/Maker Space, in particular, the inclusion of the flexible outdoor space.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I21-4 The comments acknowledge the TK/K classrooms would be built with consideration for the needs of four-year-olds.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I21-5 The comments state concern for the proposed installation of a turf field, removal of the natural grass field, and the need for provision of green space and natural vegetation on the school campus.

Refer to Response to Comment I6-1 relative to the proposed athletic field.

I21-6 The comments state that turf fields shed plastic grass blades that may be transported elsewhere and indicate opposition to installing plastic and microplastic shedding surfaces.

Refer to Response to Comment I6-1 relative to the proposed athletic field.

I21-7 The comments state that turf fields may cause more non-contact injuries and that they are less safe than grass fields.

Refer to Response to Comment I6-1 relative to the proposed athletic field. The comments provided do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I21-8 The comment states that turf fields are hot and may have potential related safety issues.

Refer to Response to Comment I6-1 relative to the proposed athletic field. The comments provided do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I21-9 The comments indicate support for not using recycled tire infill and for using newer types of plastics; however, the comments state that there is still the potential for off-gassing, which may occur with higher temperatures.

Refer to Response to Comment I6-1 relative to the proposed athletic field.

- I21-10 The comment questions whether use of planned air filtration systems to handle future severe wildfire events are proposed.

The heating, ventilation, and air conditioning (HVAC) systems in the new structures would be provided with MERV 13 filtration systems to reduce potential risk of airborne contaminants. The Proposed Project would be designed in accordance with Division of the State Architect requirements to ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by the Division of the State Architect and the California Building Code (Title 24 of the California Code of Regulations). 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. Refer also to Section 4.3, Air Quality, and Section 4.20, Wildfire, of the Draft IS/MND. However, this comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I21-11 The comment questions whether student-maintained gardening areas or a vegetable garden are proposed (raised planters).

As indicated in Section 3.4, Proposed Project, of the Draft IS/MND, the Campus Plan includes provision of an outdoor garden for future student use; refer also to Figure 3-6A, Proposed Campus Plan (at Buildout). This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I21-12 The comments question whether the District has considered a natural grass sports field that may use water recycling for potential savings, and for managing drainage and flooding issues.

Refer to Response to Comment I6-1. The comments provided neither identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

122. Harry Leshner, Email dated April 9, 2025.

From: Harry Leshner [REDACTED]
Sent: Wednesday, April 9, 2025 2:45 PM
To: Upton, Carey <cupton@smmusd.org>
Subject: Franklin Elementary School Campus Plan Comments

Hi Carey,

I am writing to share comments for the SMMUSD Board on the Franklin Elementary School Campus Plan. I am a new Franklin Elementary parent, with my child starting Kindergarten next year! Overall I think the plan seems like a great step forward to modernize our school. Here are my comments for things I'd like to keep in the final plan, and things I hope will be reviewed for further consideration.

122-1

Positives / Things I'd like to Keep in the Final Plan:

122-2

- Lots of open outdoor space, with plants and other landform features incorporated into the design 122-3
- Modern architecture that fits well with Southern California, and the classroom buildings seem to let in a lot of natural light 122-4
- Large open interiors and high ceilings in the classroom seem well suited to adapting to current and future needs 122-5
- The maker space seems like an interesting addition, including the adjacent presentation space, hopefully for special projects and student presentations 122-6
- Seems good to relocate the TK/K rooms to the main campus

Concerns / Things I'd like to be reviewed further:

122-7

- If the administration building isn't a historic building, it seems like there's an opportunity to utilize that space and the lawn out front for better uses
- Reduction in size of the field, and removal of natural grass
 - I appreciate that the plan is considering new technology / materials, but all artificial turfs will shed at least somewhat and that comes home with the children, in addition to more exposure to microplastics, and it's also unavoidable that small pieces of garbage will collect on the artificial turf over time 122-8
 - Converting a large area of grass to turf will increase heat levels, which is getting worse due to climate change, and could be even more disastrous in the event of a major fire 122-9
 - What's happening to the paved track? It's currently the only area in north Santa Monica where small children can learn to ride a bike safely 122-10
- It seems like some thought was put into grouping and ordering the grade level for the rooms, then it seems like it's not ideal that the 5th grade rooms are straddling two floors and some right next to the first grade rooms 122-11
- 122-12
- I'd like to see further details on the proposed implementation timeline 122-12

Thank you for your consideration. I would be very eager to stay engaged and share further feedback as this plan continues to be developed.

122-13

Thanks,
 Harry Leshner

I22. Responses to Comments from Harry Leshner, Email dated April 9, 2025.

- I22-1 The comments acknowledge that the proposed Campus Plan design would modernize the school.

These comments provided are introductory and do not raise an environmental issue relative to CEQA. No further response is required.

- I22-2 The comment states that the Master Plan as proposed proposes open outdoor space, with plants and other landform features incorporated into the design.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-3 The comments indicate that the modern architecture of the Proposed Project "fits well with Southern California" and that the classroom buildings appear to let in a lot of natural light.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

- I22-4 The comment states that the proposed "large open interiors and high ceilings in the classroom seem well suited to adapting to current and future needs."

This comment does not raise an issue of environmental concern related to the Proposed Project. The comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-5 The commenter expresses interest in the proposed Maker Space, including the adjacent presentation space.

This comment does not raise an issue of environmental concern related to the Proposed Project. The comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-6 The comment acknowledges the proposed relocation of the TK/K rooms to the main campus.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-7 The commenter states that if Building B building isn't historic, there may be an opportunity to better utilize the space and associated lawn.

As indicated in the Draft IS/MND, Building B was determined to be individually eligible for listing in the California Register of Historical Resources and for local (City of Santa Monica) listing. The evaluation and eligibility determination included the lawn at the front of the site. Under CEQA, buildings and sites that are eligible for listing in the state and local register are to be treated as historic resources (section 21084.1 of the CEQA Statutes).

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-8 The comments request that the District reconsider the proposed reduction in size of the athletic field and removal of natural grass. The comments express concern regarding how artificial turf may potentially shed materials that can be brought home by students; increased potential exposure to microplastics; and potential for garbage to collect on the artificial turf surface.

Refer to Response to Comment I6-1.

- I22-9 The comment requests the District further consider that, relative to the proposed athletic field, conversion of a large area of grass to turf may increase heat levels, which is worsening due to climate change, and may be hazardous in the event of a major fire.

Refer to Response to Comment I6-1.

- I22-10 The comment requests the District further consider, relative to the proposed athletic field, what would happen to the paved track, indicating that it is currently the only area in north Santa Monica where children can safely learn ride a bike.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact; therefore, no further response is required.

- I22-11 The comment states that it does not seem ideal that the proposed 5th grade classrooms are proposed on two floors with some next to the 1st grade rooms.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-12 The commenter requests additional details on the implementation timeline for the Proposed Project.

As described in Section 3.4, Proposed Project, of the Draft IS/MND, the District is proceeding with design and engineering of phase 1 (1A and 1B) of the funded activities, while later phases of the Proposed Project would occur at the District's discretion when funding becomes available. The Proposed Project's activities by phase are detailed in Section 3.4.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I22-13 The comment is in closing and indicates they wish to remain engaged and share further feedback as the Proposed Project continues to be developed.

This comment neither identifies a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

I23. David Yuguchi, Email dated April 9, 2025.

From: David Yuguchi [REDACTED]
Sent: Wednesday, April 9, 2025 3:37 PM
To: Upton, Carey
Cc: Tricia Crane
Subject: Franklin Elementary School Campus Plan Project

Dear Carey Upton:

Upon review of the proposed plan for Franklin Elementary School Campus Plan Project Draft Initial Study/Mitigated Negative Declaration I have the following observations and comments:

1. Table 3-1

A.

There is incomplete information pertaining to Existing Sizes and heights regarding the different parts of the project. This missing information makes it difficult to compare before and after conditions as the Phases of the project are completed. It is not clear, for instance how much open space and recreation areas are to be gained or lost with this Plan. It is also not clear how much area is gained or lost in classroom and administrative support.

I23-1

2. Recreation areas

A.

Going from a U-12 soccer field to a U-10 field is disappointing and seems to be unnecessary. Not only is the field smaller, but so is the track.

I23-2

B.

Perhaps more importantly is the proposal to install artificial turf on this campus. Artificial turf is a dangerous and toxic composite material that exposes all those that interact with it to risks of cancer, burns and heat exhaustion from overheated fields, infectious diseases from contaminated turf material, as well as increased injuries. The increase in dangerous chemicals introduced into the campus environment pose significant health risks to all that work and study at the campus. The use of artificial turf increases the carbon footprint of the school by the use of petroleum based products. **Please do not approve the use of artificial turf at Franklin Elementary School.**

I23-3

3. Given that this proposed project does not increase the size or capacity of the school, and that Phase 2, 3 and 4 are not guaranteed to be built, it is not clear to me that it is a good idea for Phase 1 to be built as proposed, which would result in a major disruption to the campus, swap places of the parking lot with the kindergarten, remove the soccer field, track and basketball courts, and leave less recreational outdoor areas; essentially to not yield any net gains, only losses. I question the wisdom and design of this approach. The existing campus with the location of the recreation areas, playground, soccer field, track, basketball courts, tether ball courts and parking lot essentially create a large open space that not only benefits the school, but also the neighborhood. Placing the kindergarten on Idaho will create a walled in campus and much of that open space effect would be lost. This loss would be exacerbated by

I23-4

the introduction of the retaining wall along 23rd Place alley. The existing location of the kindergarten has historically seemed to have served it well and I don't understand the necessity to move that function.

I23-4,
ctd.

I make these remarks as a parent of a former student of Franklin School, so I am quite familiar with the campus, having volunteered there as well.

I23-5

Best regards,

David Yuguchi
Architect
Yuguchi Architecture
[REDACTED]

I23. Responses to Comments from David Yuguchi, Email dated April 9, 2025.

- I23-1 The comment states that Table 3-1 of the Draft IS/MND provides incomplete information pertaining to existing sizes and heights of the proposed elements, making it difficult to compare before and after conditions as phases are completed. Further, the comment states the table is unclear regarding the gain/loss of open space and recreation areas, or classroom and administrative support space with the Proposed Project.

Table 3-1 of the Draft IS/MND provides a detailed breakdown of the proposed improvements by phase, including columns identifying the square footage of existing on-site structures and facilities, along with proposed building square footage and height. The proposed demolition/removal and new construction of recreational amenities (playfield, handball walls, hopscotch and tetherball courts, etc.) and classroom and administrative support space are broken down and identified for each phase in Table 3-1.

The comments provided do not identify a deficiency in the Draft IS/MND's analysis or a potential new or exacerbated significant environmental impact. No further response is required.

- I23-2 The comment expresses opposition to the proposed transition from a U-12 soccer field to the proposed U-10 field, noting that both the field and track would be reduced in size.

Refer to Response to Comment I6-1 and I19-9. The comments provided neither identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I23-3 The comments state concern over the proposed artificial turf field and potential related exposure to toxic composite materials; burns and heat exhaustion from overheated fields; infectious diseases from contaminated turf material; and increased injuries. The comments indicate concern over the potential introduction of dangerous chemicals on the campus and health risks, as well as increasing the school's carbon footprint from the use of petroleum-based products.

Refer to Response to Comment I6-1.

- I23-4 The comment questions development of Phase 1 as proposed, with concerns for potential disruption to the campus; relocation of the employee parking lot; removal of the soccer field, track and basketball courts; and reduction in recreational outdoor areas. The commenter states that the existing campus as designed creates a large open space that benefits the school and surrounding neighborhood, and that the current Campus Plan proposes certain design elements (relocation of the kindergarten on Idaho Avenue; retaining wall along 23rd Place alleyway) that may result in a loss of the existing open space effect.

As indicated in Section 3.3, Existing Use and Conditions, of the Draft IS/MND, the District's Master Facilities Use Agreement allows the City and the community to use the District's school facilities, including the Franklin Elementary School playfields, recreational facilities, and buildings, which are available for non-school programming rentals when school and school programs are not in session. The Master Facilities Use Agreement includes a Playground Partnership Agreement, which provides recreation space use at

Franklin Elementary School, including the playgrounds, athletic facilities (soccer field and basketball courts), and lawn areas along Montana Avenue, to Santa Monica children and families on weekends and during school breaks when school is not in session. Use of the school's facilities under the Master Facilities Use Agreement would not change with Proposed Project implementation.

The proposed relocation of the TK/K facilities and staff parking lot within the campus is design-related and does not represent an action that would result in a significant effect on the environment relative to CEQA.

The comments provided do not identify a deficiency in the Draft IS/MND's analysis nor a potential new or exacerbated significant environmental impact. No further response is required.

- I23-5 The comments made are in summary and do not raise an environmental issue of concern. No further response is required.

I24. Nina Segil, Email dated April 9, 2025.

From: Nina Segil [REDACTED]
Sent: Wednesday, April 9, 2025 5:00 PM
To: Upton, Carey
Subject: Franklin Project

Good Evening -

I do not support the use of a synthetic turf field in the Plan for Franklin School. After hearing and researching regarding the negative health consequences of a turf field - I feel it is not in the best interest of our students to proceed with this kind of project. | I24-1

We need to look at the potential long term impacts of our kids being exposed to the environmental impacts of artificial turf. | I24-2

Please do not proceed with this project with artificial turf and please do not reduce the size of the field. | I24-3

Kindly,

Nina

I24. Responses to Comments from Nina Sigil, Email dated April 9, 2025.

I24-1 The comment states opposition to the proposed synthetic turf field and notes potential negative health consequences on students.

Refer to Response to Comment I6-1.

I24-2 The comment states the need to look at the potential long-term impacts of students being exposed to potential environmental impacts of artificial turf.

Refer to Response to Comment I6-1.

I24-3 The commenter requests that the District not proceed with the proposed artificial turf field or reduced size of the field.

This comment is made in summary. Refer to Responses to Comments I24-1 and I24-2. No further response is required.

3 COMMENTS RECEIVED DURING PUBLIC COMMENT MEETING (HELD MARCH 18, 2025 AT FRANKLIN ELEMENTARY SCHOOL)

The District held a community meeting from 5:00 p.m. to 6:30 p.m. on Tuesday, March 18, 2025, in the Franklin Elementary School Auditorium. The meeting included a presentation from the District, including the District Chief Operations Officer, Franklin Elementary School Principal, Project architects, historic resources consultant, and California Environmental Quality Act (CEQA) consultant. The format of the presentation allowed attendees to ask questions during the presentation. The following are comments/questions asked throughout the presentation, and the responses provided.

Comment 1: How will the construction affect the kids?

Response: The construction would occur in phases affecting only a portion of the campus at a time, which would allow enough classroom areas and space for the students continue school.

Comment 2: Have you had any involvement with the community to let them know about this?

Response: Mr. Carey Upton, District Chief Operations Officer, responded that this community meeting, which is also part of the public comment period, is intended to involve the community. The District has also sent notifications to the public as well as publicized the public comment period in the local newspaper as part of the notification processes. Mr. Upton also stated that he has attended multiple neighborhood council meetings to discuss the Proposed Project.

Comment 3: When will Phase 2 occur?

Response: The earliest that Phase 2 would commence would be August 2028.

Comment 4: What is the shading requirement for the parking lot?

Response: The parking lot requires a 50 percent shade cover, which would be accomplished using shade trees.

Comment 5: During the architect's presentation, it was mentioned that the school would be designed to follow the City's setback and height limits at the two-story building area. What are these?

Response: While the District is not required to follow the City's zoning setback and height requirements, the campus plan would nevertheless be designed and built to comply with the City's 10-foot setback and 32-foot maximum height requirements.

Comment 6: During the historical resources presentation, it was mentioned that Building B/Main Administration Building was characterized as an eligible historic resource, but then on another slide was called a potential historic resource. It seems like if a building is a designated historical resource then the community doesn't have the opportunity to get their input in on whether the building should be historic. Is there something that says you can't demolish this building? Can the Main Building be demolished and the classrooms be placed there?

Response: A historical resource may be determined either by designation or through an analytical evaluation process. For the purposes of CEQA, a building that has been evaluated to

qualify as a potential historical resource would be treated as an eligible historic resources. The District has a board policy to identify and evaluate the campus structures for the potential for historical significance. The proposed campus plan is designed to avoid damaging a resource. The District is potentially able to demolish an eligible historic resource, but this would be a different environmental review process. Under CEQA, this would result in a significant environmental impact, and there would also be other stakeholders who would be very adverse to this impact.

The comments provided by the commenter do not raise an environmental issue of concern relative to CEQA nor do they question the adequacy of the IS/MND.

Comment 7: We have not received any invitation to the District Board regarding what we may or may not want.

Response: The public is given the opportunity to provide their comments to the District Board at the Board Hearing for this Project, which is estimated to occur in May or June of this year.

Comment 8: The City of Los Angeles changed their historic resources policies as a result of the wildfires because a number of historic resources were burned. How would this affect the historic resources identified on the campus?

Response: The school campus is located in the City of Santa Monica and there have not been changes to the historic resources designations or policies within the City. There are no needed changes to the evaluation of historic resource or the analysis of impacts to historic resources in the Draft IS/MND.

Comment 9: How can the Draft IS/MND conclude that there would be no impacts to wildfires?

Response: The campus is not located within a State Responsibility Area or a fire hazard severity zone. As analyzed in the Draft IS/MND, the Proposed Project would not substantially impact an emergency evacuation plan, would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildlife, would not exacerbate fire risks, and would not expose people or structures to significant risks from wildfires.

Comment 10: What are the construction hours from the City's Noise Ordinance?

Response: As provided in the Draft IS/MND, the City of Santa Monica Municipal Code (SMMC) Chapter 4.12, Noise, restricts the hours for construction activity to between 8:00 a.m. and 6:00 p.m. on Monday through Friday, and from 9:00 a.m. to 5:00 p.m. on Saturday, with some exceptions for construction that the City deems to be in the public interest. Construction activity is prohibited on Sunday and holidays. As stated in the Draft IS/MND, the District may request a permit authorizing construction activity during the times prohibited by the construction timeframe to avoid construction deliveries during the school drop-off timeframes.

Comment 11: Can you promise that the alley will not be closed off at any time?

Response: The Proposed Project would involve opening up the alley. During construction, there are some areas of utility work where the work area would need to be temporarily closed off. The District will provide notification to neighbors in these areas at the time when such improvements occur.

4 MINOR REVISIONS TO THE DRAFT IS/MND

4.1 INTRODUCTION

This section contains revisions to the Draft IS/MND based upon 1) updated information that was not available at the time of IS/MND publication; and/or 2) minor text edits made for clarification. The revisions do not alter any impact significance conclusions as disclosed in the IS/MND. Changes made to the IS/MND are identified here in strikeout text to indicate deletions and in underlined text to signify additions.

4.2 ERRATA

Environmental Checklist, Table of Contents, Page iii, is revised due to updated information.

LIST OF APPENDICES

- Appendix A Air Quality/Greenhouse Gas/Energy Data
- Appendix B-1 Historical Resources Inventory Report
- Appendix B-2 Historical Resources Technical Report
- Appendix B-3 Update to Historical Resources Technical Report
- Appendix B-4 Historical Resources Records Search Results
- Appendix B-5 Historical Resources Technical Report Addendum
- Appendix C Geotechnical Exploration Report
- Appendix D Phase I Environmental Site Assessment
- Appendix E Noise Data
- Appendix F Pedestrian/Circulation Safety Evaluation

Environmental Checklist, Section 3.4, Proposed Project, Table 3-1 (excerpt below), Page 3-7, is revised for clarification.

TABLE 3-1 SUMMARY OF EXISTING AND PROPOSED FACILITIES

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size ¹	Final Conditions (Existing to Remain and New Construction with Proposed Project) ¹	Max Height (Existing/New) Under Proposed Project
Phase 4				
Building C (Library)	Demolition	2,800 SF	--	--
Building H (Classrooms)	Demolition	2,224 SF	--	--
Cafetorium	Demolition and New Construction	5,720 SF	5,000 SF; Auditorium and Outdoor Performance Area	1 story; 30 feet

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size ¹	Final Conditions (Existing to Remain and New Construction with Proposed Project) ¹	Max Height (Existing/New) Under Proposed Project
Library; Book Garden	Demolition and New Construction	--	5,000 SF	1 story; 20 feet
Flex Science/Music/Art Building	New Construction	--	4,300 SF	1 story; 20 feet
Outdoor Classroom Space	New Construction	--	--	--
Interior Improvements to 1 st Floor of Administration Building	Renovation	11,100 SF	11,100 SF (Total Building SF); Includes Upgraded Administrative and Teacher Support Spaces (8,300 SF) and Restrooms (280 SF)	2 stories; 30 feet
Interior Improvements to 2 nd Floor of Administration Building	Renovation	11,226 SF	Provision of Two Teaming Areas (3,600 SF); One Special Education Classroom (1,800 SF)	2 stories; 30 feet
<u>Removal of one-story projecting volume (northeast corner of Administration Building)</u>	<u>Demolition</u>	<u>968 SF</u>	--	--
Lawn Improvements along Montana Avenue	Renovation	--	--	--
TOTAL SQUARE FOOTAGE OF PROPOSED PROJECT				
Square Footage Totals:	<i>Demolition</i>	40,676 SF <u>41,644 SF</u>		
	<i>New Construction</i>	69,959 SF		
	<i>Renovation</i>	22,326 SF		

Source: dsk Architects 2024

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

Environmental Checklist, Section 3.4, Proposed Project, Page 3-8, is revised for clarification.

Phase 4 would involve demolition of the existing library (Building C) and modular classrooms (Building H) in the western portion of the campus, adjacent to the existing alley. A new library, music and flex science/art building, and auditorium would be constructed, and outdoor performance space provided.

Outdoor classroom space and a book garden would also be constructed. During this phase, the main building (Building B) would undergo interior renovations on the first floor to upgrade the administrative and teacher support spaces and restrooms. Additionally, interior improvements on the second floor of the administration building would include provision of two teaming areas and a special education classroom. A one-story projecting volume (not associated with the historic design) at the building's northeast corner would also be removed; refer to Section 4.5, Cultural Resources, for additional discussion. Enhancements to the existing lawn adjacent to Montana Avenue would occur, and additional fencing would be installed.

Environmental Checklist, Section 4-1, Aesthetic Resources, Impact 4.1-b, Page 4-3, is revised for clarification.

The proposed improvements would result in limited visual changes of the façade of the original Main Building; however, the Proposed Project has been designed to minimize such alterations so as to maintain the visual character and integrity of the original building. The Main Building, including its associated landscaping, would be retained during all phases of the Proposed Project. The Proposed Project would result in some alterations of the Main Building during Phase 4, which would involve interior renovations of the building, ~~and removal of a one-story projecting volume at its northeast corner. This volume is a later addition to the building and is not associated with its historic design.~~ Additionally, interior spaces within the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building.

Alterations of the Main Building during Phase 4 would also involve removal of a one-story projecting volume at its northeast corner. This volume is a later addition to the building and is not associated with its historic design. Removal would not result in the destruction of historic fabric, nor would it substantially change the appearance of the historical resource when viewed from the public right-of-way on Montana Avenue. Exterior modifications to the Main Building would comply with SMMUSD Board Policy (BP) 7113 and Administrative Regulation (AR) 7113, which were adopted by the District in 2021 and state, among other provisions, that the Secretary of the Interior's Standards shall be applied to all work on identified historical resources.

The alterations proposed as part of Phase 4 would not materially impair those physical characteristics that convey the significance of the resource, ~~as those are confined to exterior spaces.~~ Therefore, the Main Building would maintain integrity of setting following the Proposed Project's implementation and would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark (ARG 2025). As indicated in Section 4.5, Cultural Resources, potential impacts to designated historical resources have been avoided through the Proposed Project's design and adherence to District regulations, and therefore, a significant impact would not result with the Proposed Project's implementation. Refer to Section 4.5, Cultural Resources, for a more detailed discussion.

Environmental Checklist, Section 4.5, Cultural Resources, Introductory Paragraph, Page 4-46, is revised due to updated information.

This section is based, in part, on the Historical Resources Inventory Report, dated August 2022, and the Historical Resources Technical Report dated October 2022, both prepared for the Proposed Project by Architectural Resources Group (ARG); refer to Appendices B-1 and B-2, respectively. Subsequently, to evaluate design revisions made to the proposed Campus Plan after these studies were originally prepared, an addendum to the Historical Resources Technical Report was prepared by ARG in March 2025; refer to Appendix B-3, Review of Updated Campus Plan, Franklin Elementary School, Santa Monica. A historical

resources records search was also conducted at the South Central Coastal Information Center for the school campus and a 0.25-mile radius; refer to Appendix B-4. An addendum to the Historical Resources Technical Report was also prepared by ARG in April 2025 to evaluate revisions to the Campus Plan design that occurred subsequent to preparation of the original October 2022 report; refer to Appendix B-5.

Environmental Checklist, Section 4.5, Cultural Resources, Impact Statement 4.5-a, Pages 4-47 to 4-48, is revised due to updated information.

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

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

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

The Proposed Project would remove and demolish seven permanent buildings, two modular buildings, and seven portable buildings, none of which are historical resources. The Main Building, including its associated landscape, would be retained during all phases of construction. The Proposed Project would result in some alterations to the Main Building during Phase 4, which would involve interior renovations of the building. Such renovations would include upgrades to the administrative and teacher support spaces and restrooms on the first floor, as well as provision of two teaming areas and a special education classroom on the second floor. As discussed above, interior spaces in the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. Such spaces are not included in the list of character-defining features of the historical resource, and interior alterations to the building would therefore not result in the removal or destruction of historic fabric (ARG 2025). Additionally, a one-story projecting volume, which was a later addition to the building, would be removed at the Main Building’s northeast corner with the Proposed Project. This volume is not associated with the building’s historic design and its removal would therefore not result in the destruction of historic fabric, nor would it significantly change the appearance of the historical resource when viewed from the public-right-of-way on Montana Avenue. New construction would not be attached to Building B, and sufficient space would exist between the historical resource and the new buildings to allow for an unambiguous delineation between historic fabric and new construction. Exterior modifications to the Main Building would comply with SMMUSD Board Policy (BP) 7113 and Administrative Regulation (AR) 7113, which were adopted by the District in 2021 and state, among other provisions, that the Secretary of the Interior’s Standards shall be applied to all work on identified historical resources.

Further, the Proposed Project would retain the existing landscape at the front (north) of the Main Building, which is a part of the historical resource. Enhancements to the existing lawn would occur, and additional fencing would be installed; refer also to **Table 3-1, Summary of Existing and Proposed Campus Plan Facilities**.

Additionally, new buildings and outdoor spaces, including the Maker-Space building, classroom building, and cafeteria and culinary education building, would not require demolition or alteration of the Main Building. The Maker-Space building and the replacement cafeteria/culinary arts building would be physically separated from the Main Building and would be located at a considerable distance behind the historical resource. The replacement classroom building would be two stories tall, similar to the Main Building, and would read as a more visually prominent component of the campus than the existing one-story buildings. However, the new classroom building would be located in the eastern side of the campus, whereas the Main Building occupies a prominent central location at the front (north) of the campus and would continue to read as a focal point of the campus as well as its primary entrance. The new classroom building would result in some changes to the immediate setting of the Main Building by introducing additional massing adjacent to the historical resource, but would not compromise the important spatial relationship that historically and currently exists between the Main Building and Montana Avenue. The sequence of entry from the street, through the lawn, and to the entrance of the Main Building would remain intact. Additionally, the new classroom building would not be physically attached to the Main Building. The Main Building would continue to retain its integrity of setting following completion of the Proposed Project.

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

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

The Proposed Project, as designed, would not result in a substantial adverse change in the significance of a historical resource, as defined in section 15064.5. Impacts in this regard would be less than significant. Refer to Appendices B-2, ~~and~~ B-3, and B-5 for additional discussion.

Environmental Checklist, Section 4.9, Hazards and Hazardous Materials, Mitigation Measures HAZ-1 and HAZ-2, Pages 4-88 and 4-89, are revised for clarification.

HAZ-1 Prior to demolition or renovation activities, the existing buildings ~~proposed for demolition or renovation~~ shall be inspected by a qualified environmental specialist for the presence of hazardous building materials, including asbestos containing materials, lead-based paints, and polychlorinated biphenyls. If hazardous building materials are detected, abatement and removal of these materials shall be conducted in accordance with applicable federal, state, and local guidelines as follows:

- In the event that asbestos containing material and/or lead-based paints are encountered, notice shall be provided to South Coast Air Quality Management District, and any demolition activities likely to disturb asbestos containing material and/or lead-based paints shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work in conformance with South Coast Air Quality Management District, California Occupational Safety and Health Act (e.g., Asbestos Consultant and Technician Certification), California Department of Public Health (e.g., Department of Public Health Lead-Related Construction Certification), Department of Toxic Substances Control, and other applicable requirements. If found, asbestos containing material and/or lead-based paint shall be disposed of at an appropriately permitted facility.
- If polychlorinated biphenyls are found on the campus, these materials shall be managed in accordance with the Metallic Discards Act of 1991 (PRC, ~~sections 42160-42185~~) and other state and federal guidelines and regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly section 42175, Materials Requiring Special Handling, for the removal of polychlorinated biphenyls.
- Once hazardous building materials are removed, a follow-up inspection shall be performed of the existing buildings prior to demolition or renovation to confirm that the hazardous items have been removed to an acceptable level per Department of Toxic Substances Control requirements before commencing with demolition activities.

HAZ-2 Prior to any soil-disturbing construction activities on-site, a limited Phase II subsurface investigation shall be performed within areas of suspected of potential contamination to determine the presence of chemicals of concern in the campus. If the soil sampling identifies the presence of contaminated soils, the contractor shall develop a plan for removal or encapsulation of the affected soils. A Site Management Plan, Corrective Action Plan, Remedial Action Plan, or other equivalent plan shall be prepared that adheres to the Department of Toxic Substances' Control's requirements, regulations, guidance documents, policies, and procedures. The Plan shall include a Health & Safety Plan and shall establish remedial measures and/or soil management practices to ensure construction worker safety and the health of future site occupants and visitors. The Plan shall include a plan for management of soil during construction, dust control measures, and waste management. After the District confirms that the affected soils have been removed, through the collection of soil samples in the excavation areas, the excavation shall be backfilled and compacted with clean soil, and the contractor shall prepare a Completion Report that documents the removal and presents analytical results for the confirmation samples.

Environmental Checklist, Section 4.13, Noise, Mitigation Measure NOI-1, Pages 4-116 to 4-117, is revised for clarification.

NOI-1 The Santa Monica-Malibu Unified School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. The Construction Noise Control Plan shall include, but not be limited to, the following measures:

- The construction contractor shall ensure that power construction equipment (including combustion or electric engines), fixed or mobile, are equipped with noise shielding and muffling devices (consistent with manufacturers' standards) during the entirety of ~~Proposed~~ Project construction. The combination of muffling devices and noise shielding shall be capable of reducing noise by at least 5 dBA from non-muffled and shielded noise levels. Prior to initiation of construction, the contractor shall demonstrate to the District that equipment is properly muffled, shielded, and maintained. All equipment shall be properly maintained to ensure that no additional noise due to worn or improperly maintained parts would be generated.
- The construction noise control plan shall depict the location of construction equipment storage and maintenance areas, and document methods to be employed to minimize noise disruptions on adjacent noise sensitive land uses.
- At least 15 days prior to commencement of construction, the District shall send notice regarding the Project construction schedule to property owners and occupants located within 500 feet of the ~~Proposed~~ Project grading limits. A sign, visible to the public, shall also be posted at the construction site. All notices and signs shall be reviewed and approved by the City of Santa Monica Public Works Department prior to mailing or posting and shall indicate the dates and duration of construction activities and provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.
- The construction contractor shall provide evidence that a construction staff member is designated as a Noise Disturbance Coordinator who shall be present on-site during construction activities. The Noise Disturbance Coordinator shall be responsible for responding to any local complaints about construction noise. When a complaint is received, the Noise Disturbance Coordinator shall notify the District within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, bad muffler) and shall implement reasonable measures to resolve the complaint, as deemed acceptable by the District's Facility Improvements Department.
- All notices that are sent to residential units immediately surrounding the construction site and all signs posted at the construction site shall include the contact name and the telephone number for the Noise Disturbance Coordinator.
- The construction contractor shall demonstrate to the satisfaction of the District's Facility Improvements Department that construction noise reduction methods shall be used, including but not limited to, shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied residential areas, and the use of electric air compressors and similar power tools, to the extent feasible.

- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.
- To the extent feasible, haul routes shall be designed such that the routes do not pass sensitive land uses or residential dwellings.

Environmental Checklist, Section 4.13, Noise, Mitigation Measure NOI-2, Pages 4-119 to 4-120, is revised for clarification.

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

Environmental Checklist, Section 4.17, Transportation, Mitigation Measure TR-1, Page 4-136, is revised for clarification.

TR-1 Before the start of construction of phase, the Santa Monica-Malibu Unified School District shall work with the City of Santa Monica Public Works Department to develop and implement a Construction Management Plan that is specific to the needs of each phase. The Construction Management Plan shall include a Temporary Traffic Control Plan (TTCP) to address anticipated impacts to or closures of public rights-of-way. The Construction Management Plan (including the TTCP) shall be submitted to the City Public Works Department for approval prior to construction of each phase of the ~~Proposed~~ Project. The TTCP shall demonstrate appropriate traffic handling during construction activities for all work that could impact the traveling public (e.g., the transport of equipment and materials to the campus area). The TTCP shall minimize hazards through industry-accepted traffic control practices. At a minimum, the TTCP shall require the contractor to do the following:

- Obtain transportation permits necessary for oversized and overweight load haul routes and follow regulations of the applicable jurisdiction for transportation of oversized and overweight loads;
- Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if deliveries could preclude free flow of traffic in both directions or cause a temporary traffic hazard; prohibit deliveries of heavy equipment and construction materials during periods of heavy traffic flow (i.e., 30 minutes before or after school start and end times);
- Develop a Traffic Education Program to educate parents, students, and staff on drop-off/pickup procedures specific to each phase of construction, which includes informational materials regarding student drop-off and pickup procedures via regular parent/school communication methods and posted on the school website;
- Utilize portable message signs and information signs at construction sites as needed;

- Coordinate with the responsible agency departments, including the City of Santa Monica Public Works and Planning Departments, and the City of Santa Monica Fire Department no less than 10 days prior to the start of the work for each phase, including specifying whether any temporary vehicle, pedestrian, or bicycle construction detours are needed, if construction work would encroach into the public right-of-way, or if temporary use of public streets surrounding the campus is needed; ~~and~~
- Review all existing emergency access and evacuation plans and identify procedures for construction area evacuation in the case of an emergency declared by local authorities; and,
- 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.

Environmental Checklist, Section 4.18, Tribal Cultural Resources, Mitigation Measure TCR-1, Pages 4-140 to 4-141, is revised for clarification.

TCR-1 Monitor During Ground-Disturbing Activities

- A. Monitoring for tribal cultural resources shall be conducted during the ~~Proposed-Project's~~ construction ground-disturbance activities. The monitor shall meet the Secretary of the Interior's standards for professional archaeology and shall be retained prior to the commencement of ground-disturbing activity for the ~~proposed project-Project~~ at the campus and satellite locations. "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor shall maintain monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Native Americans.

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

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

Environmental Checklist, Section 4.18, Tribal Cultural Resources, Mitigation Measure TCR-3, Page 4-141 to 4-141, is revised for clarification.

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

- A. Native American human remains are defined in PRC § 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in ~~Public Resource Code Section~~ PRC § 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods are discovered or recognized on the ~~Proposed Project~~ site, then ~~Public Resource Code~~ PRC § 5097.9, as well as Health and Safety Code ~~Section~~ § 7050.5, shall be followed.
- C. Human remains and grave/burial goods shall be treated alike per ~~California Public Resources Code section~~ PRC § 5097.98(d)(1) and (2).
- D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Environmental Checklist, Section 4-21, Mandatory Findings of Significance, Impact 4.21-c, Cultural Resources, Pages 4-154 to 4-155, is revised due to updated information.

As discussed in Section 4.5, Cultural Resources, the Proposed Project includes building demolition and new building construction on-site. The original campus building (Main Building) on the Franklin Elementary School site was evaluated for historical significance and determined to be individually eligible for listing in the CRHR and for local (City of Santa Monica) listing. The evaluation also included the lawn at the front (north) of the site. No other buildings or site features located on the campus satisfy the definition of a historical resource for purposes of CEQA (ARG 2022a). ~~The Proposed Project does not include demolition or any exterior changes to the Main Building.~~ Demolition activity would include ~~be limited to~~ removal of seven permanent buildings, two modular buildings, and seven portable buildings, none of which are historical resources. The Main Building, including its associated landscape, would be retained during all phases of the Proposed Project. The Proposed Project would result in alterations to the Main Building during Phase 4, which would involve interior renovations of the building. As discussed above, interior spaces in the Main Building have been extensively modified over time and lack sufficient integrity to meaningfully convey an association with the historical and architectural significance of the building. Additionally, a one-story projecting volume (not associated with the historic design) at the building's northeast corner would be removed. Exterior modifications to the Main Building would comply with SMMUSD Board Policy (BP) 7113 and Administrative Regulation (AR) 7113, which were adopted by the District in 2021 and state, among other provisions, that the Secretary of the Interior's Standards shall be applied to all work on identified historical resources. The alterations proposed as part of Phase 4 would not materially impair those physical characteristics that convey the significance of the resource. Therefore, the Main Building would continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark following the Proposed Project's implementation (ARG 2025).

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Attachment A:
Athletic Field Data

Unlimiting Play Through Sustainable Turf Solutions

**CA
CAN'T
AFFORD
TO BAN
PLAY**

STOP THE CA TURF BANS

California communities are facing decisions that will impact play in a monumental way: To ban or not to ban? Artificial turf in California is under scrutiny, and the proposed bans — based on a concern for PFAS — are



informed, short sighted and likely to
do more harm than good.

[Read More](#)

[Sign On](#)

[Send Your Own Testimonial](#)

TENCATE TURF: PLAYING FOR KEEPS



We're playing for keeps. To keep our communities healthy and our world beautiful. To keep materials in play through recycling infrastructure. And to keep play going, no matter the region or season.

TENCATE TURF: PLAYING FOR KEEPS

BENEFITS OF SYNTHETIC TURF

Synthetic turf came about because natural grass wasn't viable in many situations. Turf was an innovative solution to avoid the challenges with creating and maintaining natural grass fields, and this is still true today.

In fact, artificial turf solves issues of play inequity and climate change challenges such as droughts or water scarcity. Plus, it can be a reliable and resource-friendly solution to keeping play accessible. And now, through the [TenCate Turf Recycling Solutions](#) program, turf in the U.S. can be fully recycled.

MAINTENANCE

high rate of emissions associated with mowers and other fuel-powered equipment. No grass clippings also reduces a major component of landfilled municipal solid waste.



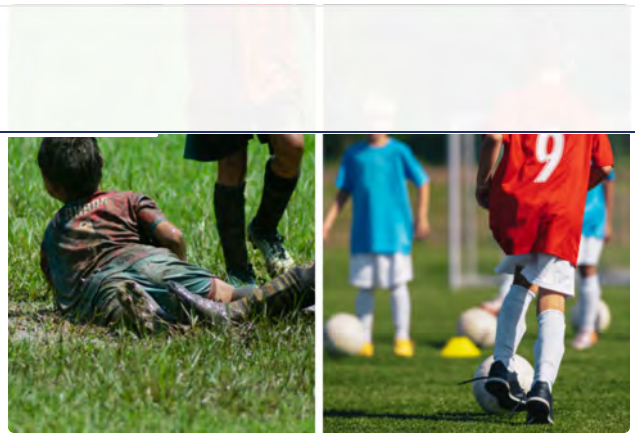
WATER AND SOIL HEALTH

With continually worsening droughts across more and more of the USA, synthetic turf means unlimited play without depending on limited water resources. Synthetic turf also has no need for pesticides and fertilizers that can harm soil health and often leach into local watersheds, negatively impacting potable water sources or aquarian ecosystems.

CLIMATE CHANGE



doesn't require recovery time from heavy use or rain. It can provide consistent, safe play regardless of environmental circumstances.



PLAY EQUITY AND ACCESSIBILITY



Artificial turf is bringing play to communities who need it most. Whether it's limited water or greenspace or difficult weather conditions, turf makes play inclusive and equitable — exactly the way it should be.

HEAR FROM PROFESSIONAL
ATHLETE SUPPORTERS



Max Moore

Mission Viejo / UCLA
92 Summer Olympics
94, 98, 02 FIFA World Cups
US National Soccer Hall of Fame

"The utilization of turf is imperative in providing equal opportunities for youth in urban areas to engage in sports and physical activities, regardless of weather conditions. All communities should have the same opportunities for athletic training and success. Furthermore, sports and physical activities play a crucial role in combating obesity in both youth and adults".



Wynalda

Westlake Village / San Diego State University
90, 94, 98 FIFA World Cups
US National Soccer Hall of Fame

"Synthetic turf offers a dependable and long-lasting playing surface, enabling young athletes in urban areas to engage in sports and physical activities without concerns about adverse weather conditions. Regardless of weather, these turf fields deliver a consistent playing experience, guaranteeing that all communities have equitable opportunities for athletic training and success."

HEAR FROM LOCAL ADMINISTRATION SUPPORTERS



**Alan
Reising**

Assistant

**Superintendent- Facilities &
Operations at Long Beach
Unified School District**

"As our communities continue to rely on public schools to support the recreational needs of our neighborhoods, our fields have become almost a 24/7 operation. School Districts need resilient, sustainable solutions that can withstand the type of rigorous use we put on our athletic fields. Simply put, natural grass



Ted

Walstrom

**Assistant Superintendent-
Facilities and Governmental
Relations at Santa Ana Unified
School District**

"With the Community Schools movement, our facilities and playfields are used many more hours per day than they were designed for. It is impossible to keep natural grass in playable shape without the proper recovery time. This ban will only



remove opportunities for our
youth to have safe surfaces

need these solutions and I
ask that you join me in
opposing this ban.”
to play on.”

[See More Testimonials](#)

SUSTAINABLE SOLUTIONS FOR SYNTHETIC TURF

TenCate wants communities to feel good about the turf under their feet. That's why we continually innovate to raise our standards and meet or exceed expectations. While turf inherently meets social and environmental needs, we're committed to creating the best turf on the market by putting sustainability first in research, design and manufacturing.

What's fact, what's not

We know our industry is under the microscope. We totally understand where the questions come from — and we think it's time to bring some clarity.

[LEARN MORE](#)



GeoCool™ Infill

TenCate's own GeoCool™ infill is made from a renewable inorganic mineral that's 100% recyclable and non-toxic.

[EXPLORE INFILL](#)





End of Life

For the first time ever in the United States, we're offering zero-waste solutions for turf fields, and making turf circular.

[DISCOVER HOW](#)



Unlimiting Play

Turf keeps play inclusive, equitable and accessible, regardless of greenspace or climate.

PFAS

Turf has less PFAS than many daily-use products, even some that we put in or on our bodies.

GeoCool¹ Infill

TenCate's own GeoCool™ infill is made from a renewable inorganic mineral that's 100% recyclable and non-toxic.

End of Life

For the first time ever in the United States, we're offering zero-waste solutions for turf

Unlii Play

Turf keeps play inclusive, equitable and accessible regardless of greenspace or climate.

we're
manufacturing
our
turf
without
added
PFAS.

making
turf
circular.

[DISCOVER](#)

[HOW](#)

[LEARN](#)

[MORE](#)

FAQ'S

— Is artificial grass better than natural grass?

In the perfect conditions, natural grass would be the field of choice for many. However, the perfect conditions (good weather, accessible water, healthy soil that doesn't need fertilizers) rarely exist. And that's where turf comes in. Synthetic grass from TenCate offers a no-maintenance, no-water, and

– **What are the benefits of artificial grass?**

From providing a 24/7/365 surface for play, to requiring zero water, ongoing maintenance or harmful pesticides and fertilizers, artificial grass proves to be a valuable resource for communities all around the globe. And contrary to popular belief, it can be a sustainable choice for many communities, especially now that we have circular solutions and can recycle aged turf.

– **How much PFAS does turf have?**

Through extensive research and development, TenCate has designed turf without PFAS, removing the source of PFAS from the manufacturing process of our turf fibers. There is more PFAS in dental floss, other turf, and even some natural grass fields than in TenCate turf.

– **Should I be concerned about rubber infill?**

While rubber infill is an industry standard, TenCate has been exploring other, more sustainable options for infill such as our GeoCool™ Infill. In addition to being made from a renewable source, GeoCool Infill also helps reduce the surface temperature of a field through slow evaporative cooling. A

– Does artificial grass get recycled?

TenCate is providing the first of its kind turf recycling program to address the end of life of turf fields. There are roughly 265 million square feet of installed turf in North America right now, and our concern is keeping that out of landfills. We’re developing new circular solutions and partnerships that help return end-of-life turf back to the value chain.

– Is artificial turf bad for the environment?

The worst impact artificial turf has on the environment is at its end of life, which occurs around a decade after installation. However, understanding this, TenCate is working hard to create a reliable program that will take turf back — any turf, not just TenCate’s — to repurpose the materials and give it new life, keeping it out of the landfill.

But importantly, and often overlooked, **turf has some important benefits to the environment** when compared to grass. For instance, to maintain a grass field, 500,000 to a million gallons of water are needed a year. In a water-stressed area, that makes field hydration a significant burden for communities.

Artificial turf also doesn’t require the synthetic fertilizers that natural grass does. In fact, “natural” grass is far from natural.

watering. These additives to natural grass fields can impact people and wildlife by leaching chemicals into water sources and aquarian ecosystems, emitting carbon from gas-powered mowers, and using excessive amounts of water.

– Is synthetic sports turf safe for athletes?

Yes, turf is safe for athletes. In fact, turf offers a unique ability to innovate, design and adapt to common athletic complaints and issues, and is continually improving. At our [Center for Turf Innovation](#), we're exploring ways to enhance our turf based on athletes' experiences.

LATEST BLOGS



Protected: What Is Artificial Turf Made From?

March 31, 2025

Case Study: Breaking Records at Rice University

March 5, 2025

A Groundbreaking Pivot: TenCate Launches First Artificial Turf that Truly Replicates Grass Field

February 28, 2025



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LET'S TALK TURF

WHAT'S FACT, WHAT'S NOT

At TenCate, we believe in creating healthier, greener, and more beautiful spaces where people live, play, and connect.

As a manufacturer, we know we carry a responsibility — not just to deliver high-performance turf solutions, but to do so in a way that respects our planet. We're pushing forward with a strategy rooted in **product innovation** and **operational optimization**, because sustainability isn't a checkbox — it's a commitment.

questions about safety and recyclability — we've heard it all.

But the truth is: Many of these concerns are based on **misconceptions, outdated data, or misinformation.**

We totally understand where the questions come from — and we think it's time to bring some clarity.

That's why we're addressing some of the most common **myths about turf** — and sharing what the facts and science really say.

MYTH: TURF IS MADE FROM DANGEROUS CHEMICALS



Fact: turf is made from the same materials we use in everyday life, safely. Here's what turf is made of :

- **Polypropylene:** Used in items like face masks, yoga pants, yogurt containers,

- **Polyethylene:** Commonly used in water bottles and everyday packaging
- **Polyester:** Frequently used in food packaging, medical equipment, jerseys and athletic wear.
- **Polyurethane:** Used in footwear to replace leather, creating lightweight sports shoes, safety shoes, and recycled soles.



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REIMAGINING THE TURF OF TOMORROW

As the first step in achieving turf circularity, we've launched the TenCate Turf Recycling Solutions pilot program. With this substantial investment, we're able to take immediate action to improve sustainability across the entire synthetic turf industry.

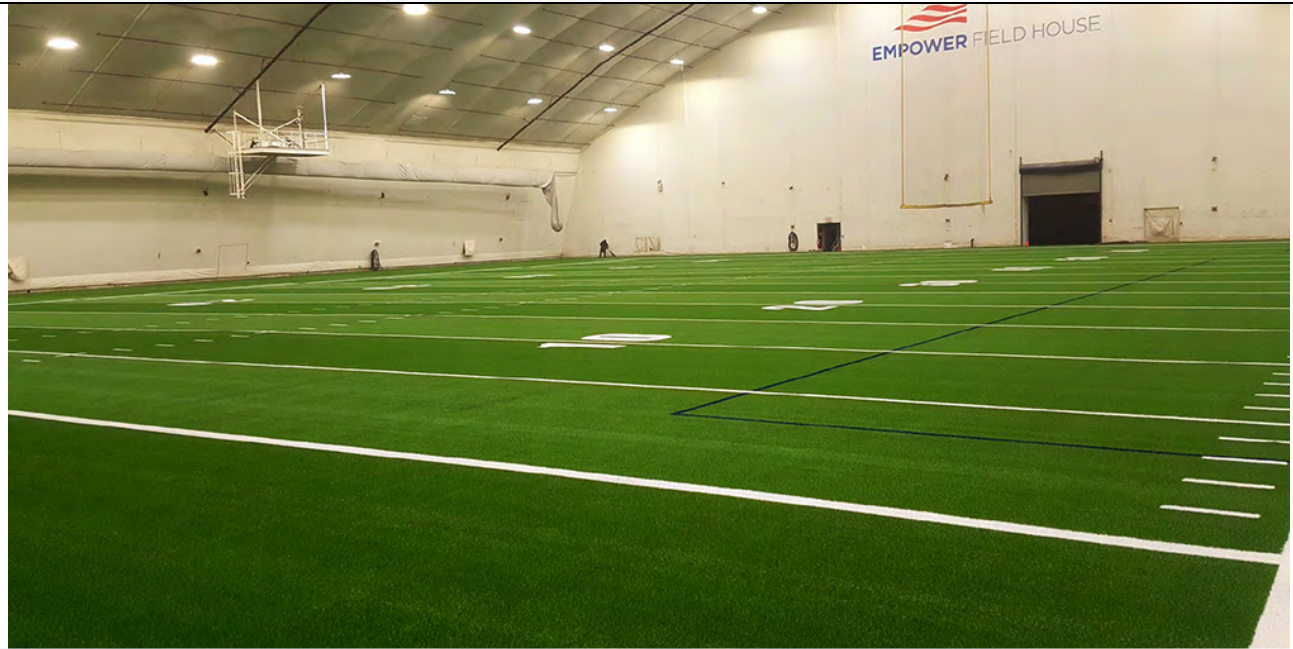
[GET IN TOUCH](#)

A GREAT PRODUCT, MADE BETTER



2% of the US is experiencing regular drought and many national and local governments are calling for reductions in the use of water, pesticides and fertilizers in recognition of their risks to the environment and our shared future. That's where TenCate Grass and our synthetic turf products come in.

Today, the demand for synthetic turf as a sustainable replacement for lawns, backyards, and athletic fields is growing rapidly. But until now, there has been no ideal end-of-life solution for artificial turf in America. **We're changing that.**





Today, the demand for synthetic turf as a sustainable replacement for lawns, backyards, and athletic fields is growing rapidly. But until now, there has been no ideal end-of-life solution for artificial turf in America. **We're changing that.**

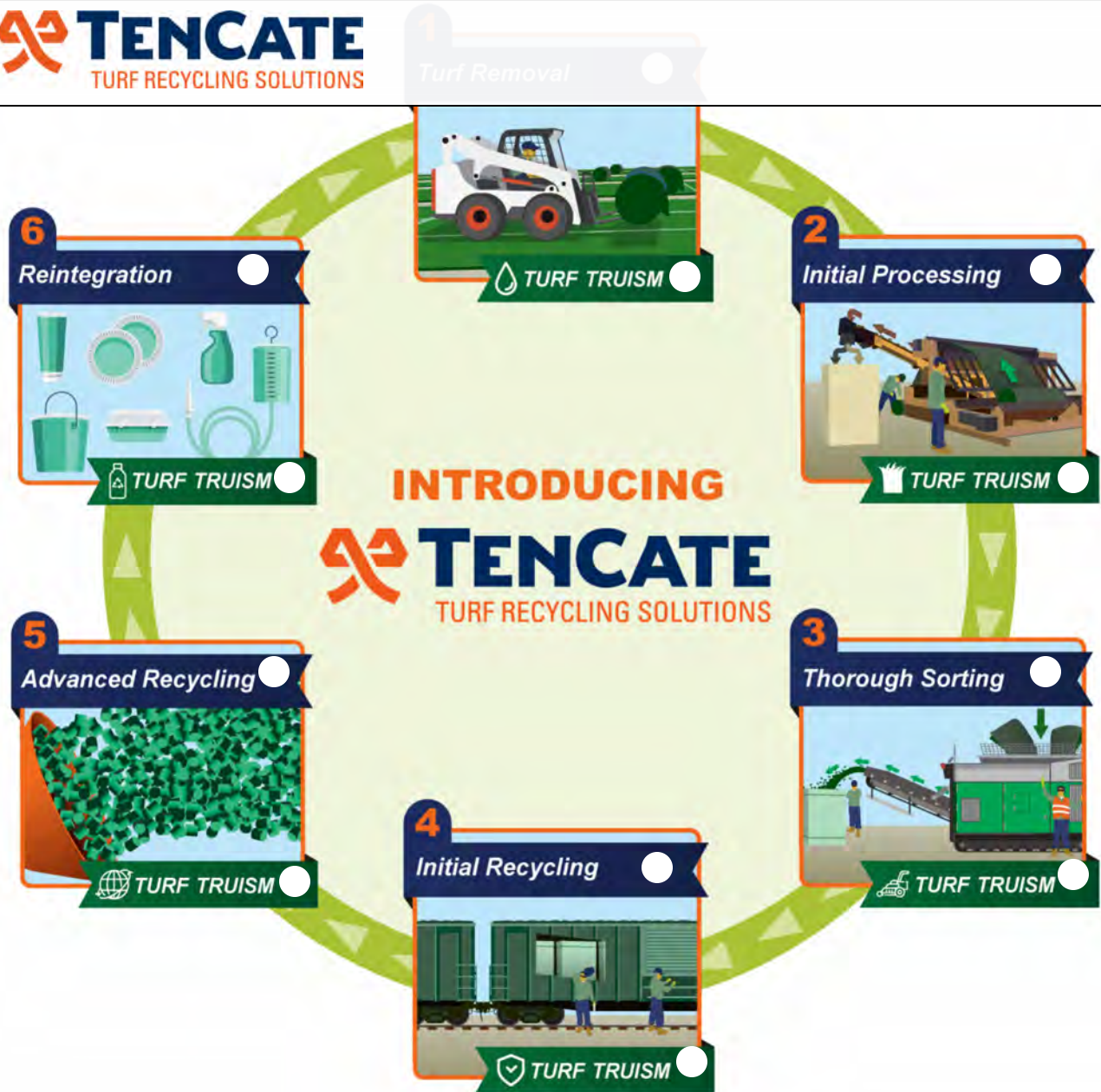
SOLVING FOR CIRCULARITY

advanced recycling technologies can actually break down the old turf to its molecular building blocks. These molecular building blocks then become the raw materials for making new, high-quality products.

TenCate is leading the charge to build circularity into turf's lifecycle by leveraging these advanced recycling technologies. The outcome: America's first truly circular model for turning old turf into new plastic products – including, in some instances, new turf.

***FROM END-OF-LIFE
TURF TO NEW
PRODUCTS***





GROWING OUR ACTION

GET IN TOUCH

Interested in partnering for truly
circular turf removal, installation, or
just want to learn more? Please get in
touch! We are initiating our recycling



GeoCool is an innovative cooling agent that provides heat absorption and disbursement

HIGH PERFORMANCE COOLING AGENT WITH ULTIMATE TEMPERATURE REDUCTION

for reduction in surface temperatures.

GeoCool can be used with SBR rubber

granules and silica sand infills. It is not

organic and therefore eliminates the

problems associated with organic infills—

decay, flotation, dust, migration (due to wind,

rainfall, and foot traffic) and the need for

constant watering of the turf to maintain

efficacy. GeoCool is an inorganic oolitic (“egg

shaped”) calcium carbonite mineral

(“aragonite”) created—and constantly

renewed—in shallow sea beds. It is 100%

recyclable, neutralizes some odors, and is

virtually dust-free. It is non-toxic—in fact,

calcium carbonite has been ingested by

humans for eons.

KEY ATTRIBUTES OF GEOCOOL

Surface temperature reduction through slow water evaporation

Resistant to decay, rot and mildew

PVC and vinyl free

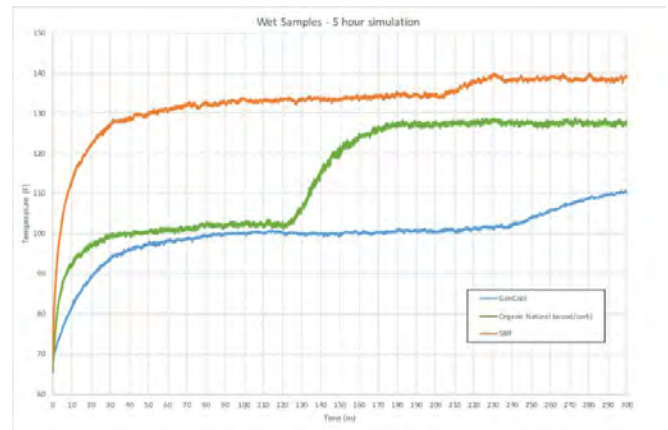
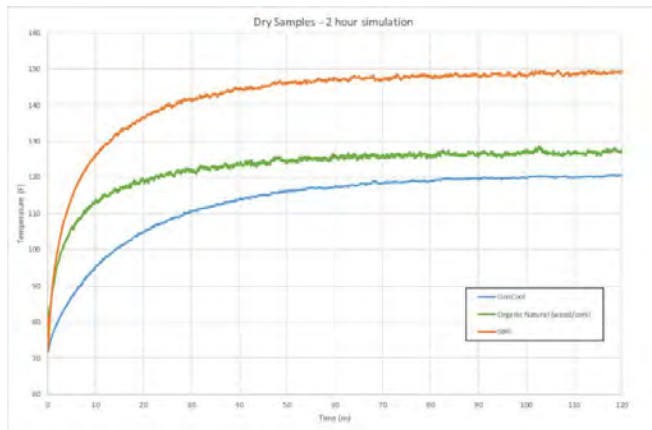
Contains no silica

Lead content : <0.25 ppm

Permeability: 220+ in/hour

Low dust emission: 114 micrograms/meter³

Prop 65 compliant



GEOCOOL COOLING
AGENT BROCHURE



Sitemap

Attachment B:
**SMMUSD Public Noticing
and Outreach Materials**

ON March 07 2025

UNTIL April 07 2025

REGISTRAR – RECORDER/COUNTY CLERK



2025 047005

FILED
Mar 07 2025

Deen C. Logan, Registrar – Recorder/County Clerk

Electronically signed by CARINA CHEN

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

**NOTICE OF INTENT TO ADOPT A
DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

TO: Agencies, Organizations, and Interested Parties

FROM: Santa Monica-Malibu Unified School District (Lead Agency)

SUBJECT: Notice of Intent to Adopt a Draft Initial Study/Mitigated Negative Declaration for the Proposed Franklin Elementary Campus Plan School Project

PROJECT TITLE: Franklin Elementary School Campus Plan Project

NOTICE IS HEREBY GIVEN that the Santa Monica-Malibu Unified School District (SMMUSD or District), as lead agency, has prepared a Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Franklin Elementary School Campus Plan Project (Proposed Project), pursuant to the California Environmental Quality Act (CEQA) Guidelines (Pub. Resources Code, §21000 et seq.) and the CEQA Guidelines (Cal. Code of Regs, §15000 et seq.). The purpose of this notice is: 1) to serve as a Notice of Intent (NOI) to Adopt a Draft IS/MND for a (minimum) 30-day public comment period pursuant to CEQA Guidelines section 15073; and, 2) to announce a community meeting to be held by SMMUSD during the (minimum) 30-day comment period.

PROJECT LOCATION: Franklin Elementary School is located at 2400 Montana Avenue (assessor's parcel number [APN]: 4277-002-901), in the City of Santa Monica, Los Angeles County, California. The school campus consists of an approximately 5.6-acre rectangular parcel developed with the Franklin Elementary School, and is entirely owned by the District. The main entrance to the campus is off Montana Avenue, which bounds the school campus on the northwest. The main campus is bordered by 23rd Place to the southwest, 24th Place to the northeast, and Idaho Avenue to the southeast. The school includes a satellite pre-kindergarten and kindergarten facility next to the main campus on the northeast side of 24th Place, along Montana Avenue. The Franklin Elementary School campus is three blocks or approximately 2,000 feet northwest of Wilshire Boulevard, approximately 1.25 miles north of Interstate 10, approximately 2 miles southwest of Interstate 405, and approximately 1.75 miles northeast of Santa Monica State Beach and the Pacific Coast Highway.

PROJECT DESCRIPTION: The Proposed Project would renovate and modernize the existing Franklin Elementary School campus to develop new and updated facilities that would support project-based learning and provide learning opportunities that are flexible, adaptable, and with access to technology and resources in real time. At full buildout, the Proposed Project would increase the campus building area by approximately 29,286 (gross) square feet (from 63,002 square feet to 92,288 square feet). Redevelopment and modernization of Franklin Elementary School would consist of removing and demolishing seven permanent buildings, two modulars, and seven portable buildings; construct seven new buildings; and renovate one building and outdoor areas on the existing school campus and satellite facility. All entries to the school would be gated and/or secured. The District intends to move forward with design and engineering of the first phase of funded activities, and the later three phases would occur at the District's discretion when funding becomes available. Table 1, Summary of Existing and Proposed Facilities, provides an overview of the proposed improvements by phase. The maximum height of the renovated existing and new buildings would not exceed 32 feet. Implementation of the Proposed Project would not increase the capacity of the school and would not change the attendance boundaries. Refer to Figure 1 showing the proposed campus plan.

Table 1. Summary of Existing and Proposed Facilities

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size ¹	Final Conditions (Existing to Remain and New Construction with Proposed Project) ¹	Max Height (Existing/New) Under Proposed Project
PHASE 1A				
Staff Parking Lot (Southwest Portion of Campus)	Demolition	30 Stalls (Includes 3 Accessible Stalls)	--	--
Soccer Field, Asphalt Track, and Basketball Court	Demolition	U-12 Field and Two Basketball Courts	--	--
Play Field (Temporary)	New Construction	--	140 x 160 feet (Temporary, 22,400 SF)	--
Surface Parking Lot (Southwest Portion of Campus) (Temporary)	New Construction	--	30 Spaces (Temporary; Includes One Accessible Stall)	--
TK/K Classroom Building; TK/K Play Yard	New Construction	--	12,859 SF	1 story; 20 feet
PHASE 1B				
Building G (Kindergarten Classrooms)	Demolition	3,876 SF	--	--
Play Field and Surface Parking Lot (Temporary; Constructed in Phase 1A)	Demolition	140 x 160 Foot Temporary Play Field (22,400 SF); 30 Temporary Stalls	--	--
Play Field	New Construction	--	Synthetic Turf Soccer Green (U10) and Running Track	--
Surface Parking Lot (Faculty and Staff)	New Construction	--	37 Spaces	--
PHASE 2				
Classroom Building F	Demolition and New Construction	7,568 SF (7 Classrooms)	31,000 SF; 20 Regular Classrooms at 1,200 SF/Classroom, 2 Special Education Classrooms at 1,200 SF/Classroom, Outdoor Classrooms	2 stories; 32 feet
Building B – Classroom B7	Demolition	965 SF Classroom	--	--
Portable Shade Structure (Northeastern Portion of Campus)	Removal	16 x 30 Foot Shade Shelter (480 SF)	--	--
Handball Walls	Demolition	--	--	--
North Lawn Improvements	--	--	--	--
PHASE 3				
7 Portable Buildings	Demolition	8,160 SF (1,165 SF each)	--	--
Building M (Modular Classrooms)	Demolition	2,863 SF	--	--
Building D (Classrooms)	Demolition	3,000 SF	--	--
Building E (Classrooms)	Demolition	3,500 SF	--	--

2025 047005

FILED
 Mar 07 2025
 Dean C. Logan, Registrar – Recorder/County Clerk
 Electronically signed by CARINA CHEN

Campus Area (Existing Structure or Proposed Project)	Proposed Project Activity	Existing Size ¹	Final Conditions (Existing to Remain and New Construction with Proposed Project) ¹	Max Height (Existing/New) Under Proposed Project
Tetherball Courts, Hopscotch Courts, One Shade Structure, Restroom Building, and Playground Equipment	Demolition and New Construction	--	Four-Square Courts, 3 Handball Walls, Tetherball and Hopscotch Courts, and Playground Equipment	--
Maker-Space Building and Outdoor Maker Yard, Maker Patio, and Presentation Platform; Outdoor Classroom Space	New Construction	--	4,200 SF	1 story; 18 feet
Kitchen/Cafeteria; Indoor/Outdoor Seating	New Construction	--	7,600 SF	1 story; 18 feet
Outdoor Garden	New Construction	--	--	--
Reorient Outdoor Space to Accommodate 3 Full Basketball Courts	Renovation	1 Full and 2 Half Basketball Courts	3 Full Basketball Courts	--
PHASE 4				
Building C (Library)	Demolition	2,800 SF	--	--
Building H (Classrooms)	Demolition	2,224 SF	--	--
Cafetorium	Demolition and New Construction	5,720 SF	5,000 SF; Auditorium and Outdoor Performance Area	1 story; 30 feet
Library; Book Garden	Demolition and New Construction	--	5,000 SF	1 story; 20 feet
Flex Science/Music/Art Building	New Construction	--	4,300 SF	1 story; 20 feet
Outdoor Classroom Space	New Construction	--	--	--
Interior Improvements to 1 st Floor of Administration Building	Renovation	11,100 SF	11,100 SF (Total Building SF); Includes Upgraded Administrative and Teacher Support Spaces (8,300 SF) and Restrooms (280 SF)	2 stories; 30 feet
Interior Improvements to 2 nd Floor of Administration Building	Renovation	11,226 SF	Provision of Two Teaming Areas (3,600 SF); One Special Education Classroom (1,800 SF)	2 stories; 30 feet
Lawn Improvements along Montana Avenue	Renovation	--	--	--
TOTAL SQUARE FOOTAGE OF PROPOSED PROJECT				
Square Footage Totals:	<i>Demolition</i>	40,676 SF		
	<i>New Construction</i>	69,959 SF		
	<i>Renovation</i>	22,326 SF		

Source: dsk Architects 2024

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



PUBLIC REVIEW PERIOD: March 7, 2025 to April 7, 2025

RESPONSES AND COMMENTS: Responsible public agencies, trustee agencies, the Office of Planning and Research, the Los Angeles County Clerk, organizations, and members of the public are invited to review and comment on the IS/MND. Your complete and detailed response should be sent at the earliest possible date, but no later than **5:00 p.m. on Monday, April 7, 2025**. Please include the name, phone number, and email address of a contact person in all responses submitted. There will be no consideration of, or responses to, untimely comments.

Please send your response in writing with the subject heading **Franklin Elementary School Campus Plan Project to: Carey Upton, Santa Monica-Malibu Unified School District, 1717 4th Street, Santa Monica, CA 90401** or via e-mail to cupton@smmusd.org.

COMMUNITY MEETING: SMMUSD will host an in-person community meeting to present the Proposed Project and the IS/MND. The purpose of the meeting is to discuss the findings of the IS/MND and to provide an opportunity for the public to comment on environmental issues.

Time: 5:00 - 6:30 p.m.

Date: March 18, 2025

Location: Franklin Elementary School, Auditorium, 2400 Montana Avenue, Santa Monica, CA 90403

The presentation will be recorded and available to view after March 18, 2025, at <https://www.smmusd.org/Page/5591>.

POTENTIAL ENVIRONMENTAL EFFECTS: The Proposed Project would result in no environmental impacts related to Agriculture and Forestry Resources, Mineral Resources, Population and Housing, or Wildfire. Impacts related to Aesthetics, Air Quality, Biological Resources, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Public Services, Recreation, and Utilities and Service Systems were determined to be less than significant with no mitigation required. Impacts related to Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, Transportation, and Tribal Cultural Resources were determined to be less than significant after the implementation of mitigation measures. No impacts were determined to be significant and unavoidable. Per CEQA Guidelines section 15087(c)(6), the Project Site is not on state and federal hazardous materials sites enumerated under Government Code section 65962.5.

DOCUMENT AVAILABILITY: The Draft IS/MND and Notice of Intent to Adopt an IS/MND for the Proposed Project are available for public review at the following locations (physical locations during normal business hours):

- Santa Monica-Malibu Unified School District, 1717 4th Street, Santa Monica, CA 90401
- Franklin Elementary School, 2400 Montana Avenue, Santa Monica, CA 90403
- SMMUSD website: <https://www.smmusd.org/Page/5591>

If you require additional information, please contact Carey Upton at 310-450-8338 x79383.

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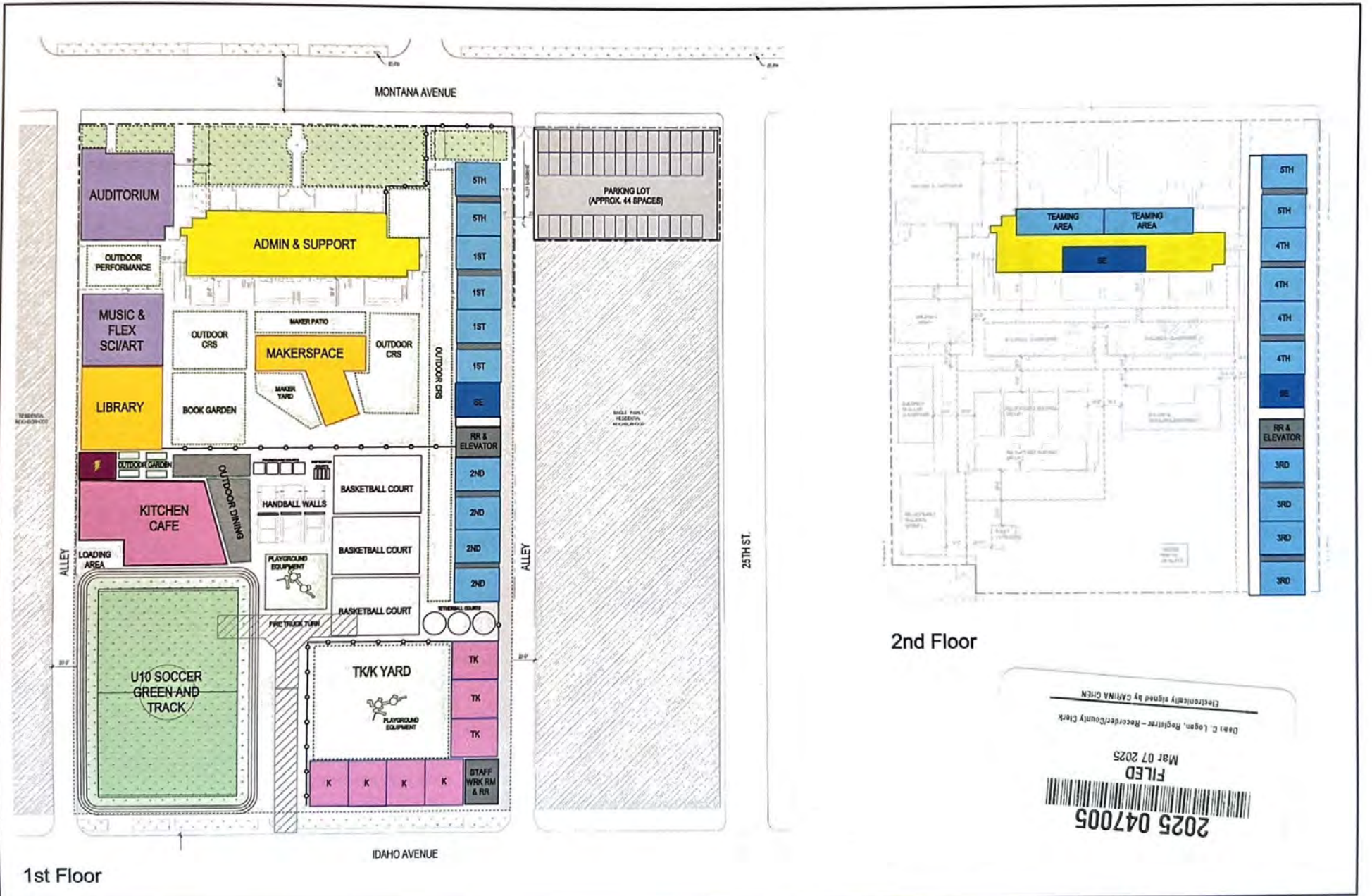


FILED

Mar 07 2025

Diana C. Lujan, Registrar - Recorder/County Clerk

Electronically signed by DARINA CHEN



FRANKLIN ELEMENTARY SCHOOL
SANTA MONICA, CA

Proposed Campus Plan (at Buildout)

Figure 1



SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT NEWS RELEASE

CONTACT: Esmi McKay
310.450.8338, ext. 79397
ecareaga@smmusd.org

FOR IMMEDIATE RELEASE
Feb. 28, 2025

SMMUSD Hosts Campus Environmental Impact Community Meeting at Franklin Elementary

Join Us! The Santa Monica-Malibu Unified School District (SMMUSD) invites parents, staff, students and community members to participate in the planning of campus facilities. The District is planning educational improvements at Franklin Elementary and are holding an in-person meeting on March 18, 2025 to take comments from the community. The meeting is scheduled from 5-6:30 p.m.

The meeting is part of the California Environmental Quality Act (CEQA) process. The District prepared an Initial Study and Mitigated Negative Declaration (ISMND). At this meeting the District will discuss environmental and historical findings, campus plans, and the findings of the ISMND that evaluated potential environmental impacts that construction and operation of the proposed project and the identified measures that will reduce the impacts. There will also be an opportunity to provide input at the meeting.

Franklin Elementary School: Tuesday, March 18, 2025

Time: 5-6:30 p.m.

Location: 2400 Montana Ave., Santa Monica, CA 90403, Franklin Cafeteria

Parking: street parking available

The meeting will include the following:

- Update on first stage project and the overall campus plan
- Review findings from historical consultant report
- Discussion of the CEQA process, environmental findings and proposed mitigations
- Opportunities for participants to ask questions and receive feedback

The California Environmental Quality Act (CEQA): The CEQA process is one that allows community members to express their concerns. It also provides the District valuable information/feedback that will be considered when moving forward in the building and design process.

Final ISMND and Board Approval: The ISMND will be released for a 30-day Public Review period which allows for the government agencies and the public to comment on the adequacy of the ISMND. Upon the conclusion of the 30-day Public Review, the District will provide written responses to all comments received on the ISMND and make any edits and changes to the

ISMND. The Final ISMND will be presented to the Board of Education for their review and adoption, which will include the Mitigation Monitoring program in spring 2025.

Public Review and Comments: The District invites the public to submit comments on the ISMND. Agencies and other interested parties, including members of the public, must submit any comments in response to the ISMND no later than 5:00 p.m. on Monday, April 7, 2025.

Written comments must be directed to Upton, and received in the offices of the District, or submitted via by e-mail to cupton@smmusd.org. For any questions or to obtain further information about the project please contact Upton via the aforementioned email or by phone at 310-450-8338 x79383.

For more information on each school's Facility Improvement Projects visit:

<https://www.smmusd.org/Page/41>.

Learn more about Franklin's Campus Plan here: <https://www.smmusd.org/Page/5591>.

For information regarding Educational Specifications visit: <https://bit.ly/3Ge9yjM>.

#

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT NEWS RELEASE

CONTACT: Esmi McKay
310.450.8338, ext. 79397
ecareaga@smmusd.org

FOR IMMEDIATE RELEASE
Feb. 28, 2025

El SMMUSD realizará una reunión con la comunidad en la Primaria Franklin sobre el efecto en el medio ambiente del plantel escolar

¡Acompáñenos! El Distrito Escolar Unificado de Santa Mónica-Malibú (SMMUSD) invita a los padres, el personal, los estudiantes e integrantes de la comunidad a participar en la planeación de las instalaciones escolares. El distrito está planeando mejoras en el plantel escolar de la Primaria Franklin y llevará a cabo una reunión en persona el 18 de marzo de 2025 para escuchar los comentarios de la comunidad. La reunión está programada de 5:00 a 6:30 p.m.

La reunión es parte del proceso que establece la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés). El distrito preparó un Estudio Inicial y Declaración Negativa de Impacto Ambiental Mitigada (ISMND, por sus siglas en inglés). En esta reunión el distrito abordará temas sobre el medio ambiente y las investigaciones del edificio histórico, los planes del campus, y los resultados del ISMND que evaluó el efecto potencial en el medio ambiente por la construcción y operación del proyecto propuesto y las medidas identificadas que reducirán esos efectos. También habrá la oportunidad de que la comunidad haga aportaciones.

Escuela Primaria Franklin: martes 18 de marzo de 2025

Lugar: 2400 Montana Ave., Santa Monica, CA 90403, cafetería de la escuela Franklin

Estacionamiento: hay disponible en la calle

En la reunión se tratarán los siguientes temas:

- Actualización sobre la primera fase del proyecto y el plan del campus en general
- Presentación del reporte del experto en patrimonios históricos
- Tratar el tema del proceso del CEQA, los resultados ambientales y mitigaciones propuestas
- Oportunidades para que los participantes hagan preguntas y reciban retroalimentación

La Ley de Calidad Ambiental de California (CEQA):

El proceso de CEQA permite que los miembros de la comunidad expresen sus inquietudes. También proporciona al distrito una valiosa información/retroalimentación que se tomará en cuenta en el proceso y planeación del diseño.

ISMND final y aprobación de la Mesa Directiva: El ISMND estará disponible durante 30 días para la revisión del público, que permite a las agencias gubernamentales y al público comentar sobre la idoneidad del ISMND. Después del período de revisión del público de 30 días, el

distrito entregará respuestas por escrito a los comentarios sobre el ISMND que se recibieron, y hará las ediciones y cambios al ISMND. En la primavera del 2025 el ISMND final se presentará ante la Mesa Directiva de Educación para su revisión y adopción, que incluirá el programa de supervisión de la mitigación.

Revisión del público y comentarios: el distrito invita al público a hacer comentarios sobre el ISMND. Las agencias y otras partes interesadas, incluidos los miembros del público, deben presentar cualquier comentario en respuesta al ISMND a más tardar a las 5:00 p.m. el lunes 7 de abril de 2025.

Los comentarios por escrito deben dirigirse al Sr. Upton, y recibirse en las oficinas del Distrito, o enviarse por correo electrónico a cupton@smmusd.org Para cualquier pregunta o para obtener más información sobre el proyecto, comunicarse con el Sr. Upton a través del correo electrónico mencionado anteriormente o por teléfono en el 310-450-8338 x79383.

Para más información sobre el Proyecto de Mejora de las Instalaciones de cada escuela, diríjase a: <https://www.smmusd.org/Page/41>.

Obtenga más información sobre el Plan del Campus de Franklin aquí:
<https://www.smmusd.org/Page/5591>.

Para más información en torno a las Especificaciones Educativas, diríjase a:
<https://bit.ly/3Ge9yjM>.

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**SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT
NEWS RELEASE**

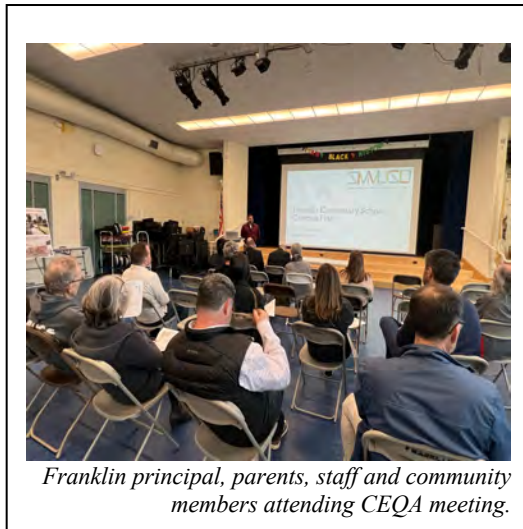
CONTACT: Esmi McKay
310.450.8338, ext. 79397
ecareaga@smmusd.org

FOR IMMEDIATE RELEASE
March 20, 2025

**SMMUSD Hosts Campus Environmental Impact
Community Meeting at Franklin Elementary**

The Santa Monica-Malibu Unified School District (SMMUSD) invited parents, staff, students and community members to participate in the planning of campus facilities. The District is in the process of planning educational improvements at Franklin Elementary School and held an in-person meeting on March 18, 2025 to take comments from the community and feedback on proposed projects.

The meeting is part of the California Environmental Quality Act (CEQA) process. The District prepared an Initial Study (IS) and Mitigated Negative Declaration (MND). At this meeting the District provided details of the campus plans, discussed the environmental and historical findings of the IS/MND that evaluated potential environmental impacts that construction and operation of the proposed project, and described the identified measures that will reduce the impacts. There will also be an opportunity to provide input at the meeting.



Franklin principal, parents, staff and community members attending CEQA meeting.

The California Environmental Quality Act (CEQA):

The CEQA process is one that allows community members to express their concerns. It also provides the District valuable information/feedback that will be considered when moving forward in the building and design process.

Final ISMND and Board Approval: The IS/MND was released for a 30-day public review period from March 7 to April 9, 2025, which allows for the government agencies and the public to comment on the adequacy of the IS/MND. Upon the conclusion of the 30-day public review, the District will provide written responses to all comments received on the IS/MND and make any edits and changes to the IS/MND. The Final IS/MND will be presented to the Board of Education for their review and adoption, which will include the Mitigation Monitoring program in spring 2025.

Public Review and Comments: The District invites the public to submit comments on the IS/MND. Agencies and other interested parties, including members of the public, must submit any comments in response to the ISMND no later than 5 p.m. on Monday, April 9, 2025.

Written comments must be directed to Carey Upton, chief operations officer and received in the offices of the District or submitted via by e-mail to cupton@smmusd.org. For any questions or to obtain further information about the project please contact Upton via the aforementioned email or by phone at 310-450-8338 x79383.

For more information on each school's facility improvement projects visit:
<https://www.smmusd.org/Page/41>.

For information regarding Educational Specifications visit: <https://bit.ly/3Ge9yiM>.

#

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SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT NEWS RELEASE

CONTACT: Esmi McKay
310.450.8338, ext. 79397
ecareaga@smmusd.org

FOR IMMEDIATE RELEASE
March 20, 2025

El SMMUSD organiza una reunión con la comunidad sobre el impacto ambiental del plantel en la Escuela Primaria Franklin

El Distrito Escolar Unificado de Santa Mónica-Malibú (SMMUSD) invitó a los padres, al personal, a los estudiantes y a los integrantes de la comunidad a participar en la planificación de las instalaciones del plantel. El Distrito está en el proceso de planificar mejoras en el entorno educativo de la Escuela Primaria Franklin y organizó una reunión en persona el 18 de marzo, 2025 para recibir comentarios de la comunidad y aportaciones para los proyectos propuestos.

La reunión forma parte del proceso de la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés). El Distrito preparó un Estudio Inicial (IS, por sus siglas en inglés) y una Declaración Negativa de Impacto Ambiental Mitigada (MND, por sus siglas en inglés). En esta reunión, el Distrito brindó detalles de los planes para el plantel, discutieron sobre los hallazgos en torno a el medio ambiente y los edificios históricos en el IS/MND que evaluó el posible efecto ambiental de la construcción y operación del proyecto propuesto, y describió las medidas identificadas que reducirían los impactos. También hubo oportunidad de hacer aportaciones en la reunión.



Ley de Calidad Ambiental de California (CEQA):

El proceso de la CEQA permite a los miembros de la comunidad expresar sus preocupaciones. También proporciona al Distrito información/aportación que se considera al avanzar en el proceso de construcción y diseño.

ISMND final y aprobación de la Mesa Directiva: El ISMND se publicó para el periodo de 30 días para la revisión del público, desde el 7 de marzo hasta el 9 de abril, 2025, lo que permite a las agencias gubernamentales y al público hacer comentarios sobre la idoneidad del IS/MND. Una vez concluida la revisión pública de 30 días, el Distrito proporcionará respuestas por escrito a todos los comentarios recibidos sobre el ISMND y realizará cualquier edición y cambio al ISMND. El ISMND final se presentará a la Mesa Directiva de Educación para su repaso y aprobación, que incluirá el programa de supervisión de la mitigación en la primavera del 2025.

Revisión y comentarios del público: El Distrito invita al público a entregar comentarios sobre el ISMND. Las agencias y otras entidades interesadas, incluyendo a los miembros del público,

deben entregar cualquier comentario con respecto al ISMND antes de las 5 p.m. del lunes, 9 de abril, 2025.

Los comentarios por escrito deben dirigirse a Carey Upton, director de operaciones, y recibirse en las oficinas del Distrito, o enviarse por correo electrónico a cupton@smmusd.org. Para cualquier pregunta o para obtener más información sobre el proyecto, por favor comuníquese con Upton a través del correo electrónico mencionado anteriormente o por teléfono al 310-450-8338 x79383.

Para más información sobre los proyectos de mejora de las instalaciones en cada escuela, visite: <https://www.smmusd.org/Page/41>.

Para obtener información sobre las Especificaciones Educativas, visite: <https://bit.ly/3Ge9yjM>.

#

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Planned Community Meeting for Franklin Elementary School

Building for Generations



**Come learn about the proposed campus plan and share your thoughts.
The meeting will discuss educational needs, historical resources, campus plans
and the next proposed projects.**

When: Tuesday, March 18, 2025 from 5:00 – 6:30 p.m.

Franklin Elementary School: Franklin Cafeteria, 2400 Montana Ave, Santa Monica,
CA. 90403

Parking: Lot off of Idaho Ave., street parking available

Questions? Contact: Esmi McKay at
ecareaga@smmusd.org.

To learn more about Franklin's campus plan please
visit: <https://bit.ly/FranklinESFIP2025>.

For more information on Facility Improvement Projects, please visit: <https://bit.ly/FIPHomepage>.



Se llevará a cabo una reunión con la comunidad en la Escuela Primaria Franklin

construyendo para el futuro



Asista y entérese del plan para la escuela que se propone y comparta sus opiniones
En esta reunión se tratarán temas como las necesidades educativas, los patrimonios
históricos, el plan para la escuela y los proyectos a futuro que se proponen.

Cuándo: Martes 18 de marzo de 2025 de 5:00 a 6:30 p. m.

Escuela primaria Franklin: Cafetería Franklin, 2400 Montana Ave, Santa Mónica,
CA. 90403

Estacionamiento: lote en la salida de Idaho Ave., estacionamiento en la calle
disponible

¿Preguntas? Comunicarse a: Esmi McKay at
ecareaga@smmusd.org.

Para más información acerca de los Proyectos de
Mejoras de las Instalaciones, favor de dirigirse a
<https://bit.ly/FranklinESFIP2025>.

Para más información acerca del plan para la escuela Franklin, dirijase a: <https://bit.ly/FIPHomepage>.

Posted on Join Us, Instagram, LinkedIn, X, and Facebook Apps

Posted March 14, 2025:



Santa Monica-Malibu Unified School District

Mar 14

📢 Join Us! 🌍🏫 #Franklin Elementary School is hosting its California Environmental Quality Act (CEQA) community meeting on Tuesday, March 18, 2025, at 5 p.m. 📅 Be part of the conversation as we discuss environmental and historical findings. Your voice matters, let's shape the future together!

💬 ✨ Read more: <https://bit.ly/FranklinCEQAPR2025>. #CEQA #CommunityMeeting

[Read less](#)



Come learn about the proposed campus plan and share your thoughts.

Posted March 18, 2025:



Santa Monica-Malibu Unified School District

Mar 18

Reminder: 📢 Join Us tonight 3/18 at 5 p.m.! 🌐🏠 For #Franklin Elementary School's California Environmental Quality Act (CEQA) community meeting. 📅 Be part of the conversation as we discuss environmental and historical findings. Your voice matters, let's shape the future together! 💬✨ Read more:

<https://bit.ly/FranklinCEQAPR2025>. #CEQA #CommunityMeeting

[Read less](#)



Come learn about the proposed campus plan and share your thoughts.

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Esmeralda Careaga

Santa Monica-Malibu Unified School District



SMMUSD Hosts Campus Environmental Impact Community Meeting at Franklin Elementary

1 file

Santa Monica-Malibu Unified School District

Diana Bouchaaya

a month ago

Wednesday, Mar 12 at 3:36 PM

CDS FRANKLIN, FRANKLIN ELEMENTARY SCHOOL

MAR 18

Tuesday

5:00 PM

Join Us! The Santa Monica-Malibu Unified School District (SMMUSD) invites parents, staff, students and community members to participate in the planning of campus facilities. The District is planning educational improvements at Franklin Elementary and are holding an in-person meeting on March 18, 2025 to take comments from the community. The meeting is scheduled from 5-6:30 p.m.

The meeting is part of the California Environmental Quality Act (CEQA) process. The District prepared an Initial Study and Mitigated Negative Declaration (ISMND). At this meeting the District will discuss environmental and historical findings, campus plans, and the findings of the ISMND that evaluated potential environmental impacts that construction and operation of the proposed project and the identified measures that will reduce the impacts. There will also be an opportunity to provide input at the meeting.

Franklin Elementary School: Tuesday, March 18, 2025
Location: 2400 Montana Ave., Santa Monica, CA 90403, Franklin Cafeteria
Parking: street parking available

The meeting will include the following:

- Update on first stage project and the overall campus plan
- Review findings from historical consultant report
- Discussion of the CEQA process, environmental findings and proposed mitigations
- Opportunities for participants to ask questions and receive feedback

The California Environmental Quality Act (CEQA): The CEQA process is one that allows community members to express their concerns. It also provides the District valuable information/feedback that will be considered when moving forward in the building and design process.

Final ISMND and Board Approval: The ISMND will be released for a 30-day Public Review period which allows for the government

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Planned Community Meeting For Franklin

#2834420

Distribution Round: 1
Submitted Date: 03-07-2025
Distribution Target Date: 03-07-2025
Post Expiration Date: 03-18-2025

Esmeralda Careaga
[Profile](#)

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1 Approved 0 Denied -- 0 Pending

Schools (1) >

SMMUSD Facility Improvement Project News (Webpage)

Facility Improvement Projects News



**SMMUSD Hosts Campus
Environmental Impact Community
Meeting at Franklin
Elementary ▼▲**



**Samohi Celebrates Ribbon Cutting
for New Exploration Building and
Gold Gymnasium ▼▲**



**SMMUSD School Board Adopts
Resolution to Buyout Property
Leases ▼▲**



**Santa Monica High School
Celebrates its New Exploration
Building and Gold Gymnasium with
Ribbon Cutting Ceremony ▼▲**

Prev



Next

SMMUSD Website - What's Happening at Franklin

What's Happening at Franklin



**SMMUSD Hosts Campus
Environmental Impact Community
Meeting at Franklin
Elementary ↓A**



**Franklin ES Campus Plan Initial
Study/Mitigated Negative
Declaration**



**Registration for Summer
Adventure is now open**

Prev



Next

Posted on Wave March

SMMUSD Hosts Campus Environmental Impact Community Meeting at Franklin Elementary

SMMUSD invited parents, staff, students and community members to participate in the planning of campus facilities. The District is in the process of planning educational improvements at Franklin Elementary School and held an in-person meeting on March 18, 2025 to take comments from the community and feedback on proposed projects.

Read more [here](#).



▶ More sharing & analytics

🕒 3 min

✎ Edit newsletter

📷 Preview



Views

👁 9,845

📊 View Analytics

Attachment C:
Addendum to the
Historical Resources Technical Report



Architectural
Resources Group

360 E. 2nd Street, Suite 225
Los Angeles, California 90012

arg-la.com

Memorandum

To: Julian Capata
Consultant, Environmental Programs
Masseti Consulting, LLC
jcapata@smmusd.org
Project: SMMUSD Historic Resources Consulting
Project No.: 210301
Date: Apr. 11, 2025
Via: E-mail

RE: Review of Updated Campus Plan, Franklin Elementary School, Santa Monica

In 2022, Architectural Resources Group, Inc. (ARG) prepared a Historical Resources Technical Report (HRTR) evaluating a proposed campus plan for Franklin Elementary School, which is located at 2400 Montana Avenue in Santa Monica.

The campus plan was further refined and updated following the preparation of the HRTR. Pursuant to your request, ARG has reviewed the updated campus plan to assess potential impacts to historical resources. This memorandum includes a discussion of ARG's analysis, and is an addendum to the existing HRTR.

This analysis was prepared by Andrew Goodrich, AICP, Senior Associate, who meets the Secretary of the Interior's Professional Qualification Standards in the discipline of Architectural History.

Background

In 2019, the Santa Monica-Malibu Unified School District (SMMUSD, or the District) adopted Districtwide Educational Specifications to provide guidance on developing future learning environments in a manner consistent with the demands of twenty-first century instructional design. Following adoption of the Educational Specifications, SMMUSD assessed the campus of Franklin Elementary School and identified a series of proposed improvements that, when implemented, would bring the campus into conformance with the Educational Specifications.

Between 2020 and 2022, a campus plan for Franklin Elementary School was prepared by dsk architects. The campus plan proposed the demolition and removal of eight existing portable buildings, two modular buildings, and one permanent building; construction of three new

buildings; and renovation of two existing buildings and outdoor areas on the existing campus and an adjacent satellite facility.

Between 2021 and 2022, ARG prepared a Historic Resources Inventory (HRI) of Franklin Elementary School to identify potential historical resources on the campus.¹ Through this process, one campus building, Building B (constructed in 1937 and enlarged in 1952), was found to be individually eligible for listing in the California Register of Historical Resources and for local (City of Santa Monica) designation. This evaluation included both the building and its associated front landscape. Building B (including its front landscape) is a “historical resource” as defined by the California Environmental Quality Act (CEQA), as well as District policies and regulations. No other buildings or improvements on the campus were found to be eligible for historic designation.

In October 2022, ARG prepared a Historical Resources Technical Report (HRTR), which included an evaluation of potential impacts to historical resources resulting from implementation of the campus plan. The HRTR evaluated both direct and indirect impacts to historical resources, and arrived at the following conclusions:

- The Project would not result in significant impacts to historical resources. Building B would neither be demolished nor materially impaired by implementing the campus plan. In addition, the potential Montana Avenue Multi-Family Residential Historic District – which was identified as a potential historic district in a separate survey commissioned by the City of Santa Monica, and includes the Franklin Elementary School campus – would not be demolished or materially impaired by implementing the campus plan.²
- The Project would not result in indirect impacts to historical resources since there are no historical resources adjacent to the campus.³

¹ The HRI was prepared to comply with Board Policy (BP) 7113 and Administrative Regulation (AR) 7113, which were adopted by the District in 2021, and require the District to identify and evaluate potential impacts to historical resources on its campuses prior to approving a master plan or school facilities project.

² Franklin Elementary School was identified in that survey as a non-contributor to the potential historic district.

³ For purposes of the HRTR, “adjacent” refers to designated and potential historical resources that are located directly next to, or in direct view of, the Project Site.

Summary of Revised Project

Between 2023 and 2024, dsk architects further refined and updated the campus plan for Franklin Elementary School to account for new information. Following are key elements of the updated campus plan:

- Interior renovation of the existing Building B to accommodate administrative and support spaces, one classroom, and two teaming rooms
- Removal of a non-original projecting volume at the northeast corner of Building B
- Interior renovation of the existing auditorium building (Building A)
- Demolition of five existing buildings: C (library), D, E, F (classrooms), and G (kindergarten)
- Construction of six new buildings:
 - Flex Science, Music, and Art (4,300-sf)
 - Library (5,000-sf)
 - Kitchen/Cafe (7,600-sf)
 - Makerspace (4,200-sf)
 - Classroom Building (31,000-sf, divided between two stories)
 - Kindergarten/Transitional Kindergarten Complex (10,700-sf) and play yard
- Construction of new outdoor spaces:
 - U-10 soccer field with running track
 - Hardscape play area with basketball and handball courts
 - New play equipment
 - New parking lot with approximately 44 spaces

With the exception of the classroom building, which would be two stories tall, new buildings associated with the updated campus plan would be one story tall, and would largely be located on the west and east perimeters of the campus. The Makerspace building would be located at the center of the campus, to the rear (south) of the existing Building B, which would remain. New outdoor spaces would be located in the southern half of the campus, with the soccer field located at the southwest corner of the campus. The new parking lot would be located on the site presently occupied by the auxiliary kindergarten campus at Montana Avenue and 25th Street.

Exterior modifications to Building B would comply with Board Policy (BP) 7113 and Administrative Regulation (AR) 7113, which were adopted by the District in 2021 and states, among other

provisions, that “the Secretary of the Interior’s Standards shall be applied to all work on identified historical resources.”⁴

Analysis of Updated Campus Plan

As discussed, there is one historical resource on the Franklin Elementary School campus: Building B (including its front landscape), which was found to be individually eligible for listing in the California Register and for local (City of Santa Monica) designation. Also as discussed, no other buildings or improvements on the campus were found to be eligible for historic designation.

The updated campus plan would result in some alterations to Building B, a historical resource. Specifically, the building’s interior spaces would be renovated and reconfigured to accommodate administrative and support spaces, one classroom, and two teaming rooms. However, the scope of these interior improvements is limited to interior spaces, which have been extensively modified and are not included in the list of character-defining features of the historical resource. Interior alterations to Building B would therefore not result in the removal or destruction of historic fabric.

Other alterations to Building B would include the removal of a one-story projecting volume at its northeast corner. This volume is associated with a later addition to the building and is not associated with its historic design. Its removal would not result in the destruction of historic fabric, nor would it significantly change the appearance of the historical resource when viewed from the public-right-of-way on Montana Avenue. It would also allow for a clear demarcation of space between Building B and new construction on the eastern perimeter of campus (discussed below).

The updated campus plan proposes retention of the existing landscape at the front (north) of Building B, which is a part of the historical resource.

Like the 2022 campus plan, new construction undertaken as part of the updated campus plan would be located almost entirely to the rear (south) of Building B. New construction would therefore have limited visibility from key vantage points of the historical resource, which is principally viewed from Montana Avenue to the north. New construction would not be attached to Building B, and sufficient space would exist between the historical resource and the new buildings to allow for an unambiguous delineation between historic fabric and new construction.

⁴ Santa Monica-Malibu USD AR 7113, Facilities: Historical Resources, adopted Feb. 18, 2021.

Also like the 2022 campus plan, the updated campus plan proposes the construction of a new, two-story classroom building along the east perimeter of the campus. This building would introduce additional height to this area of the campus but would not detract from, or otherwise compromise the significance of Building B. The new classroom building would not obstruct important views of Building B or alter the existing spatial relationship between Building B, its associated front landscape, and the public-right-of-way. By virtue of its height, setback, and visual character, Building B would continue to read as the focal point of the Franklin Elementary School campus, as it historically has.

Building B would retain all of its character-defining features at Project completion. These include:

- Orientation to the north, toward Montana Avenue
- Formal, monumental massing
- Two-story building height
- Simple, rectilinear building forms
- Flat roof and parapet
- Smooth stucco exterior walls
- Central entrance surmounted by a shallow hood
- Extensive fenestration comprising groups of tall, narrow window channels
- Continuous stringcourse delineating the first and second stories
- Wall-mounted sign that spells “FRANKLIN SCHOOL” in Broadway-style typeface
- Minimal decorative details and surface ornament
- Broad lawn, providing an entrance sequence between the street and building
- Mature trees and shrubs (in lawn)
- Central concrete walkway and flagpole (in lawn)
- Concrete planters with buffer plantings near the base of the building (in lawn)

The updated campus plan would not result in significant impacts to the potential Montana Avenue Multi-Family Residential Historic District for the same reasons discussed in ARG’s 2022 HRTR.

Conclusions

ARG reviewed the updated campus plan for Franklin Elementary School with the purpose of evaluating potential impacts to historical resources, both on and adjacent to the campus, and arrived at the following conclusions:

- The updated campus plan would not result in a significant impact to historical resources. The Project would not result in the demolition or material impairment of the significance of Building B. It will therefore not cause a substantial adverse change to the significance of the historical resource. Building B will retain all of its character-defining features and will continue to retain sufficient integrity to convey its historical significance. Building B will thus continue to be individually eligible for listing in the California Register and for local designation as a City of Santa Monica Landmark at Project completion.
- The updated campus plan would not result in a significant impact to the potential Montana Avenue Multi-Family Residential Historic District. The Project Site (Franklin Elementary School) is a non-contributor to the potential district and would continue to be such upon Project completion. The district will continue to be eligible for local designation as a City of Santa Monica Landmark at Project completion.
- The updated campus plan would not have indirect impacts on historical resources as there are no historical resources located adjacent to the Project Site.