

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

Franklin Elementary School Campus Plan Project ***Mitigation Monitoring and Reporting Program***

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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FRANKLIN ELEMENTARY SCHOOL CAMPUS PLAN PROJECT

MITIGATION MONITORING AND REPORTING PROGRAM

Prepared for:

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT
FACILITY IMPROVEMENT PROJECTS
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MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the Franklin Elementary School Campus Plan Project (Project). An MMRP is required because the Initial Study/Mitigated Negative Declaration prepared for the Project identified significant adverse impacts and measures have been identified to mitigate those impacts.

This MMRP has been prepared pursuant to section 21081.6 of the Public Resources Code (RPC), which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” California Environmental Quality Act Guidelines section 15097 states:

In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

MITIGATION MONITORING AND REPORTING PROGRAM

As the lead agency, the Santa Monica-Malibu Unified School District (SMMUSD) will be responsible for monitoring compliance with all mitigation measures. Different parties may be responsible for various aspects of the Project. The MMRP identifies the party with the responsibility for ensuring that each individual mitigation measure is completed; however, it is expected that one or more parties will coordinate efforts to ensure such compliance.

The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below.

- **Resource Section:** Identifies which resource section in the Mitigated Negative Declaration the mitigation measure applies to.
- **Mitigation Measure:** Identifies details for each mitigation measure required.
- **Timeframe of Implementation:** Identifies at which stage of the Project the mitigation measure must be completed.
- **Monitoring, Enforcement, and Reporting Responsibility:** Identifies the party with responsibility for mitigation monitoring, enforcement, and/or reporting.

MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Cultural Resources		
<p>CUL-1 Prior to ground-disturbing activities for the Project (for each individual phase of the Project), the District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the Project and shall be on-call during all grading that would exceed a depth of 5 feet. The Qualified Archaeologist shall ensure that the following measures are followed for the Project:</p> <ul style="list-style-type: none"> • Prior to any grading activities that would exceed a depth of 5 feet, the Qualified Archaeologist, or their designee, shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural (prehistoric and historic) resources. As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural resources be made during construction. • In the event that unanticipated cultural material is encountered during any phase of Project construction, all construction work within 100 feet of the find shall cease and the Qualified Archaeologist shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the Qualified Archaeologist, work shall be permitted to continue in the area. • If a find is determined to be important by the Qualified Archaeologist, he or she shall immediately notify the District. The District shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the California Register of Historical Resources. Work may not resume within the no-work radius (to be determined and established by the Qualified Archaeologist) until the lead agency, through consultation as appropriate, determine that the site either: (1) is not eligible for the California Register of Historical Resources; or (2) that the treatment measures have been completed to their satisfaction. 	Prior to ground disturbance; During grading and excavation	SMMUSD; Qualified Archaeologist; Construction Contractor

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Geology and Soils		
GEO-1 Preconstruction Meeting. A qualified professional paleontologist shall provide a preconstruction meeting for all construction workers who shall be disturbing the ground in the Project area. The preconstruction meeting shall cover paleontological resources sensitivity, safety, and next steps if a resource is identified.	Prior to construction	SMMUSD; Paleontological Monitor; Construction Contractor
GEO-2 Paleontological Construction Monitoring. A qualified professional paleontological monitor shall monitor all Project-related ground disturbing activities exceeding a depth of 5 feet below ground surface in the affected area. If a paleontological resource is identified, the paleontological monitor shall assess the find to determine if it is significant. If it is significant, the resource shall require documentation and curation.	During excavation and grading	SMMUSD; Paleontological Monitor; Construction Contractor
Hazards and Hazardous Materials		
<p>HAZ-1 Prior to demolition or renovation activities, the existing buildings 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:</p> <ul style="list-style-type: none"> 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 	Prior to and during demolition or construction	SMMUSD; Construction Contractor

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<p>containing material and/or lead-based paint shall be disposed of at an appropriately permitted facility.</p> <ul style="list-style-type: none">• If polychlorinated biphenyls are found on the campus, these materials shall be managed in accordance with the Metallic Discards Act of 1991 (PRC § 42160-85) and other state and federal guidelines and regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly section 42175, Materials Requiring Special Handling, for the removal of poly-chlorinated biphenyls.• Once hazardous building materials are removed, a follow-up inspection shall be performed of the existing buildings prior to demolition or renovation to confirm that the hazardous items have been removed to an acceptable level per Department of Toxic Substances Control requirements before commencing with demolition activities. <p>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 Substance 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.</p>		

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Noise		
<p>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:</p> <ul style="list-style-type: none"> • 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 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 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 	Prior to and during construction	SMMUSD; Construction Contractor; Noise Disturbance Coordinator

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<p>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.</p> <ul style="list-style-type: none"> • 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. 		
<p>NOI-2 The construction contractor shall utilize a construction vibration monitoring system with the ability to measure low levels of vibration (i.e., 0.3 inch/second PPV) to ensure that the architectural damage criterion (0.3 inch/second PPV) is not exceeded at any off-site structure. If vibrations are measured at 0.3 inch/second PPV or above, construction in the area shall cease and alternate methods shall be employed to ensure the architectural damage vibration criterion is not exceeded.. The greatest potential for this criterion to be exceed during 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</p>	During construction	SMMUSD; Construction Contractor

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
vibratory intensity, are available to be utilized should measure construction vibration velocities approach or exceed 0.3 inch/second PPV at the closest off-site structure.		
Transportation		
<p>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 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:</p> <ul style="list-style-type: none"> • 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; 	Prior to and during grading or construction	SMMUSD; Construction Contractor

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<ul style="list-style-type: none"> • 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; • 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. 		
Tribal Cultural Resources		
<p>TCR-1 Monitor During Ground-Disturbing Activities</p> <p>A. Monitoring for tribal cultural resources shall be conducted during the 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 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.</p> <p>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.</p> <p>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</p>	<p>Prior to ground disturbance or permit issuance; During grading and excavation</p>	<p>SMMUSD; Qualified Archaeologist; Construction Contractor</p>

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<p>activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to Native Americans.</p> <p>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.</p> <p>D. Monitoring shall conclude upon: (1) completion of ground-disturbing activities for the Project; or (2) a determination by the monitor that no future, planned construction activity and/or development/construction phase at the 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.</p> <p>TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)</p> <p>A. Upon discovery of any potential TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and the monitor shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the monitor, work shall be permitted to continue in the area. If deemed appropriate by the monitor, the appropriate Native American Tribe shall recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.</p> <p>TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects</p> <p>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 PRC § 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, then PRC § 5097.9, as well as Health and Safety Code § 7050.5, shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per PRC § 5097.98(d)(1) and (2).</p>		

Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<p>D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.</p> <p>E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.</p>		