MITIGATED NEGATIVE DECLARATION

John Adams Middle School Auditorium Replacement Project

PREPARED FOR:

Santa Monica-Malibu Unified School District
1651 16th Street
Santa Monica, California 90404

PREPARED BY:

DUDEK
38 North Marengo Avenue
Pasadena, California 91101

MARCH 2018

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing material
ALUC	Airport Land Use Compatibility
ANSI	American National Standards Institute
AQMP	Air Quality Management Plan
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
CHPS	Collaborative for High Performance Schools
CHRIS	California Historical Resources Information System
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CRPR	California Rare Plant Rank
DOT	Department of Transportation
DSA	Division of the State Architect
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FHWA	Federal Highway Administration
FT	federally threatened
GHG	greenhouse gas
GWP	global warming potential
HAZNET	Hazardous Waste Manifests Database
IPCC	Intergovernmental Panel on Climate Change
IS/MND	initial study/mitigated negative declaration
JAMS	John Adams Middle School
LACM	Natural History Museum of Los Angeles County

Acronym/Abbreviation	Definition
LBP	lead based paint
LCFS	Low Carbon Fuel Standard
LOS	level of service
LST	localized significance threshold
MLD	most likely descendant
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NF_3	nitrogen trifluoride
NO_2	nitrogen dioxide
NO_X	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
PCB	polychlorinated biphenyls
PCE	Passenger-Car Equivalence
PCH	Pacific Coast Highway
PL	Public Lands
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
PPV	peak particle velocity
PRC	Public Resources Code
PRIMP	Paleontological Resources Impact Mitigation Program
RCNM	Roadway Construction Noise Model
RMS	root-mean-square
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SA	special animal
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SE/FE	state and federally endangered
SF_6	sulfur hexafluoride
SMFD	Santa Monica Fire Department
SMPD	Santa Monica Police Department

Acronym/Abbreviation	Definition
SO_2	sulfur dioxide
SO_X	sulfur oxide
SRA	Source-Receptor Area
SSC	species of special concern
ST	state threatened
SVP	Society of Vertebrate Paleontology
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	Traffic Noise Model
USFWS	United States Fish and Wildlife Service
VOC	volatile organic compound

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1 INTRODUCTION

1.1 Project Overview

The John Adams Middle School (JAMS) Auditorium Replacement Project (proposed project) would involve replacing and augmenting existing performing arts buildings at the JAMS campus, which is located at 2425 16th Street in the City of Santa Monica, California, and is part of the Santa Monica-Malibu Unified School District (District). The existing auditorium at JAMS has been closed since 2014 due to structural safety concerns. The proposed project would involve construction of a new performing arts center at the site of the existing auditorium and music building. The proposed project would address the existing structural safety concerns at the auditorium and would also expand the performing arts space available on the site to meet existing school needs. The proposed performing arts center would be developed over the course of several phases, the first of which would involve renovating the existing music building, removing the existing auditorium, and reconstructing a new auditorium. The second phase would involve constructing a rehearsal building, and the third phase would involve replacing the music building.

1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). State CEQA Guidelines Section 15367 states that a "Lead Agency" is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, the District is the lead agency responsible for compliance with CEQA for the proposed project.

As lead agency for the proposed project, the District must complete an environmental review to determine if implementation of the proposed project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, this Mitigated Negative Declaration has been prepared to assist in making that determination. This Mitigated Negative Declaration shows that impacts caused by the proposed project are either less than significant or significant but mitigable with incorporation of appropriate mitigation measures as defined herein. This conclusion is supported by State CEQA Guidelines Section 15070, which states that a Mitigated Negative Declaration can be prepared when "(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

1.3 Project Location

The proposed project site is located within the northwestern portion of the JAMS campus, which is 11 acres in size and is located at 2425 16th Street in the City of Santa Monica (City). See Figure 1-1 (Project Location). The JAMS campus (including the project site), is designated for Institutional/Public Lands uses in the City's General Plan and is also zoned as Institutional/Public Lands (PL) by the City (City of Santa Monica 2015, 2017). The campus is situated within an urbanized area, within the Sunset Park neighborhood of the City. The campus is rectangular in shape and is oriented northwest/southeast. The campus is bordered to the northwest by Pearl Street, to the southwest by 16th Street, to the northeast by 17th Street, and to the southeast by Ocean Park Boulevard. As shown in Figure 1-2 (Project Site), the project site is located along the northwestern boundary of the campus and is bordered by Pearl Street to the north, 17th Street to the east, and the rest of the JAMS campus to the south and west.

Existing Site Uses

The proposed project site is 1.07 acres in size (within the 11-acre JAMS campus) and is currently developed with an existing auditorium, a music building, and a small lawn to the west of the existing auditorium. These uses are described in more detail below.

- Auditorium. The auditorium is located on the western portion of the site, between the lawn and the music building. Its entrance faces the lawn, although the auditorium is rectangular in shape, and its main length extends along Pearl Street. The existing auditorium is 11,823 square feet in size and has a maximum height of 35 feet. The auditorium consists of a lobby, a seating hall with approximately 600 seats, a stage, back of house areas, and an orchestral area. Image A in Figure 1-3 (Existing Auditorium) shows a majority of the auditorium's Pearl Street frontage. The music building's Pearl Street frontage can also be seen in the background of this image to the left, farther down Pearl Street. Image B in Figure 1-3 shows the entrance to the auditorium, which faces west. In this image, a portion of Pearl Street and Santa Monica College can be seen to the north, in the left-hand portion of the image. A JAMS classroom building that is not part of the project site can be seen to the south, in the right-hand portion of the image. The lawn area can be seen in the foreground of the image.
- Music Building. The music building is located on the eastern portion of the project site and is 5,600 square feet in size, with a maximum height of 21 feet. The music building consists of a chorale room, an instrument room, and supporting practice rooms and offices. Image C in Figure 1-4 (Existing Music Building) shows the music building's Pearl Street frontage. Image D in Figure 1-4 shows the music building's 17th Street frontage. The east façade of the music building is in the foreground. In the background, to the south, the play yard for the John Adams Child Development Center can be seen along Pearl Street. (The John Adams Child Development Center is a preschool that is located within the boundaries of the JAMS campus.)
- Lawn. A landscaped area consisting primarily of grass is located in the west corner of the project site. This lawn can be seen in Figure 1-3, Image B. This landscaped area is part of a larger lawn that covers the

northwestern corner of the JAMS campus. (Note that the project site does not encompass the entirety of this lawn. For example, the mature magnolia tree that is central to the lawn lies outside of the project site boundary.) With the exception of this lawn area, the project site is sparsely vegetated. Other vegetation on the site include two Mexican fan palms near the entrance to the auditorium (shown in Figure 1-3, Image B), ornamental shrubs (shown in Figure 1-3, Images A and B), and a grass strip that lines the auditorium along Pearl Street (shown in Figure 1-3, Image B). There are also several landscaping trees located along the south side of the music building, between the back of the music building and a parking lot that is located to the south of the music building.

Surrounding Land Uses

The area surrounding the project site is primarily developed with public/institutional uses and residential uses. See Figure 1-5 (Surrounding Land Uses). To the north and northeast of the project site is Santa Monica College. Directly across Pearl Street, north of the project site, is the Santa Monica College sports stadium. To the east of the project site, on the east side of the 17th Street, is a church (The Church of Jesus Christ of the Latter-day Saints). To the east and southeast of the project site is a residential neighborhood consisting primarily of single-family, single-story residential structures, interspersed with a number of two-story structures. Some of the residential structures with frontages along Pearl Street are used by Santa Monica College. For example, the Campus Police Department offices and the Scholarship Office are located in residential buildings along the south side of Pearl Street. To the south and southeast of the project site are other uses within the JAMS campus. Figure 1-2 shows labels for the campus buildings. As such on Figure 1-2, immediately adjacent to and south of the project site are several JAMS classroom buildings and a surface parking lot. To the west of the project site is a landscaped lawn area within the JAMS campus, containing grass and a mature magnolia tree that is in the approximate center of the lawn. Further to the west, on the west side of 16th Street, is a church (KYMA Church), low-density residential uses, and the Will Rogers Learning Community Elementary School.

1.4 Project Background

As described in Section 1.1, significant structural damage was discovered at the JAMS auditorium in the summer of 2014. The facility was closed to all use and temporary shoring was installed to support the structure. The District determined that significant improvements must be made to the building prior to occupancy. Necessary improvements that were identified include structural repairs and replacement of the ceiling; fire/life safety improvements including a full sprinkler system; and accessibility upgrades for restrooms and the audience areas. Modernization of the theater systems would also be needed, as the District identified that the lighting and audio systems in the auditorium are not consistent with contemporary technologies. The District also identified that the existing proscenium is not large enough to house an entire orchestra and that there is a need for additional rehearsal space and auditorium seating. For these reasons, the District began designing a replacement auditorium building that would meet the current needs of the campus while also ensuring safety and accessibility. As such, the proposed project has been designed to meet

current needs for seating and rehearsal spaces and to ensure that the performing arts structures at JAMS meet current standards for accessibility, safety, and theater technology.

1.5 References

City of Santa Monica. 2015. Santa Monica Land Use and Circulation Element. Adopted July 6, 2010. Revised July 24, 2015. Accessed January 3, 2018. https://www.smgov.net/Departments/PCD/Plans/General-Plan/.

City of Santa Monica. 2017. Santa Monica Zoning. Web Mapping Application. Last updated 2017. Accessed January 3, 2018. http://www.arcgis.com/home/webmap/viewer.html?webmap=7a65c2c884b241938011c9c702ee697c&extent=-118.5249,33.9979,-118.4161,34.052.

SOURCE: NAIP, 2016

DUDEK

0 1,000 2,000 Feet

FIGURE 1-1

Project Location

John Adams Middle School Auditorium Replacement Project

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SOURCE: HGA Architects, 2017.

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0 125 250 Feet

FIGURE 1-2

Project Site

John Adams Middle School Auditorium Replacement Project

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Image A (Above): Peal Street frontage (the north façade of the music building can be seen to the left, farther down Pearl Street)
Image B (Below): Auditorium entrance (Pearl Street and Santa Monica College are to the left; a JAMS classroom that is not part of the project site is to the right)

FIGURE 1-3

Existing Auditorium

John Adams Middle School Auditorium Replacement Project

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Image C (Above): Peal Street frontage
Image D (Below): 17th Street frontage

FIGURE 1-4

Existing Music Building

John Adams Middle School Auditorium Replacement Project

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SOURCE: HGA Architects, 2017; Bing Maps

DUDEK

0 150 300 Feet

FIGURE 1-5

Surrouding Land Uses

John Adams Middle School Auditorium Replacement Project

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2 PROJECT DESCRIPTION

2.1 Proposed Project Design

For the reasons described in Section 1.4, the District is proposing to demolish and replace the auditorium building, renovate the music building, and construct a new rehearsal building and associated terrace west of the auditorium. Within several years of these efforts, the District also plans to replace the music building. (For the purposes of conducting a conservative, worst-case scenario evaluation of the proposed project's environmental impacts, the analysis in this MND has been conducted under the assumption that the music building would be replaced directly after the other activities are completed and that there would be some overlap between Phases 1 and 2.) Collectively, the replacement auditorium, new rehearsal building, terrace, and music building will be called the "performing arts center" in this document. The performing arts center would be developed over the course of three phases:

- Phase 1 (2018–2020): Demolition of the existing auditorium; construction of the replacement auditorium; renovation of the existing music building.
- Phase 2 (2020): Construction of rehearsal building and terrace.
- Phase 3 (2020–2022): Demolition of the renovated music building and construction of a new music building and an adjacent music courtyard.

A site plan for Phases 1 and 2 is shown in Figure 2-1 (Site Plan – Phases 1 and 2), and elevations are shown in Figure 2-2 (Elevations – Phases 1 and 2). Note that the graphics in Figure 2-1 and Figure 2-2 do not include the replacement music building that is proposed as Phase 3 of the project. Figure 2-3 (Conceptual Site Plan – Phase 3) shows the proposed layout for the new music building and music courtyard that would be constructed during Phase 3.

As shown in Figure 2-1 and Figure 2-2, the new auditorium would be 20,000 square feet in size and a maximum of 54.5 feet in height; the renovated music building would be 5,600 square feet in size (same as existing conditions) and a maximum of 21 feet in height (same as existing conditions); and, the new rehearsal building would be 3,100 square feet in size and a maximum of 30 feet in height. The terrace would comprise approximately 11,500 square feet of the project site. The new music building proposed for Phase 3 would be approximately 6,500 square feet in size and approximately 30 feet in height. The associated courtyard would be 3,000 square feet. After project implementation, the overall square footage of performing arts uses on the project site would increase by approximately 12,177 square feet (this does not include the terrace and music courtyard).

Building materials for the new structures would consist primarily of acrylic cement plaster or fine sand finish, which would be used for the main outside walls of the proposed structures. Architectural elements would include sliding glass doors and architectural metal gates and screens.

Site Design and Layout

As shown in Figure 2-1, the new rehearsal building would be situated along Pearl Street, on the northwest corner of the project site. The terrace would be situated to the south and east of the rehearsal building, separating the rehearsal building from the existing classroom buildings to the south and from the auditorium to the east. The terrace would have a canopy along the project site's Pearl Street frontage and would have seating areas situated between the rehearsal building and the entrance to the auditorium. Similar to the existing auditorium building, the new auditorium would have an entrance that faces west, and the main length of the rectangular structure would extend along Pearl Street. The auditorium would consist of an indoor/outdoor lobby, a main hall with 750 seats, a stage, and back-of-house areas. A choir rehearsal area would be constructed on the second floor of the auditorium, generally above the back-of-house areas and adjacent to the music building. The renovated music building that would be part of Phase 1 would support band and orchestral rehearsal areas (choir rehearsal space would be moved from the existing music building to the second floor of the auditorium, after completion of Phase 1). As shown in Figure 2-3, the renovated music building would be demolished during Phase 3 and replaced with a new music building that would be slightly larger in size. The new music building would be oriented on the project site in a manner that leaves space for the proposed courtyard to be constructed in between the music building and the auditorium.

Landscaping

As shown in Figure 2-4 (Landscaping – Phases 1 and 2), the existing magnolia tree to the west of the project site would be retained and protected through a variety of construction best practices for tree health. The lawn to the west of the project site would also be retained. New landscaping would be installed in planters in the proposed terrace and along the project site's Pearl Street frontage. The jacaranda tree that is currently planted to the south of the music building would be retained during Phases 1 and 2 but would be removed as part of Phase 3. The courtyard that would be constructed as part of Phase 3 would also have landscaping planters. Hardscaping would primarily consist of permeable concrete unit pavers.

Sustainable Design

The District adheres to standards for environmental sustainability and green building that are established by the Collaborative for High Performance Schools (CHPS). CHPS provides a green building rating program for Kindergarten through 12th grade schools and has established environmentally responsible benchmarks for school design. The project would be designed in compliance with CHPS criteria, which include but are not limited to the use of recycled building materials, daylighting opportunities for the new buildings, building orientation, and stormwater collection. School design in accordance with CHPS standards promotes energy efficiency, water efficiency, site planning, use of green materials, and indoor environmental quality.

2.2 Construction

Construction is anticipated to begin in 2018, with construction of Phases 1 and 2 concluding in 2020. As described in Section 2.1, construction of Phase 3 is expected to occur several years after Phase 2 is completed. However, for the purposes of evaluating a worst-case construction scenario in terms of environmental effects, the analysis in this MND assumes that Phase 3 would occur consecutive to Phase 2, beginning in 2020 and concluding in 2022. Construction activities for all phases would involve demolition, building construction, site preparation, grading, and architectural coating. Refer to Appendix A for details regarding the types of construction equipment that are expected to be used, the number of workers that would be involved, and the anticipated duration of each activity. Santa Monica Municipal Code Section 4.12.1.110 limits construction to the hours of 8:00 a.m.–6:00 p.m. Monday through Friday and 9:00 a.m.–5:00 p.m. on Saturday, and construction is not allowed on Sundays or on holidays. The District would be required to follow this code and/or allowances made by the City. The City may grant the District a waiver to allow construction to occur from 7:00 a.m. to 5:00 p.m.

2.3 Operations

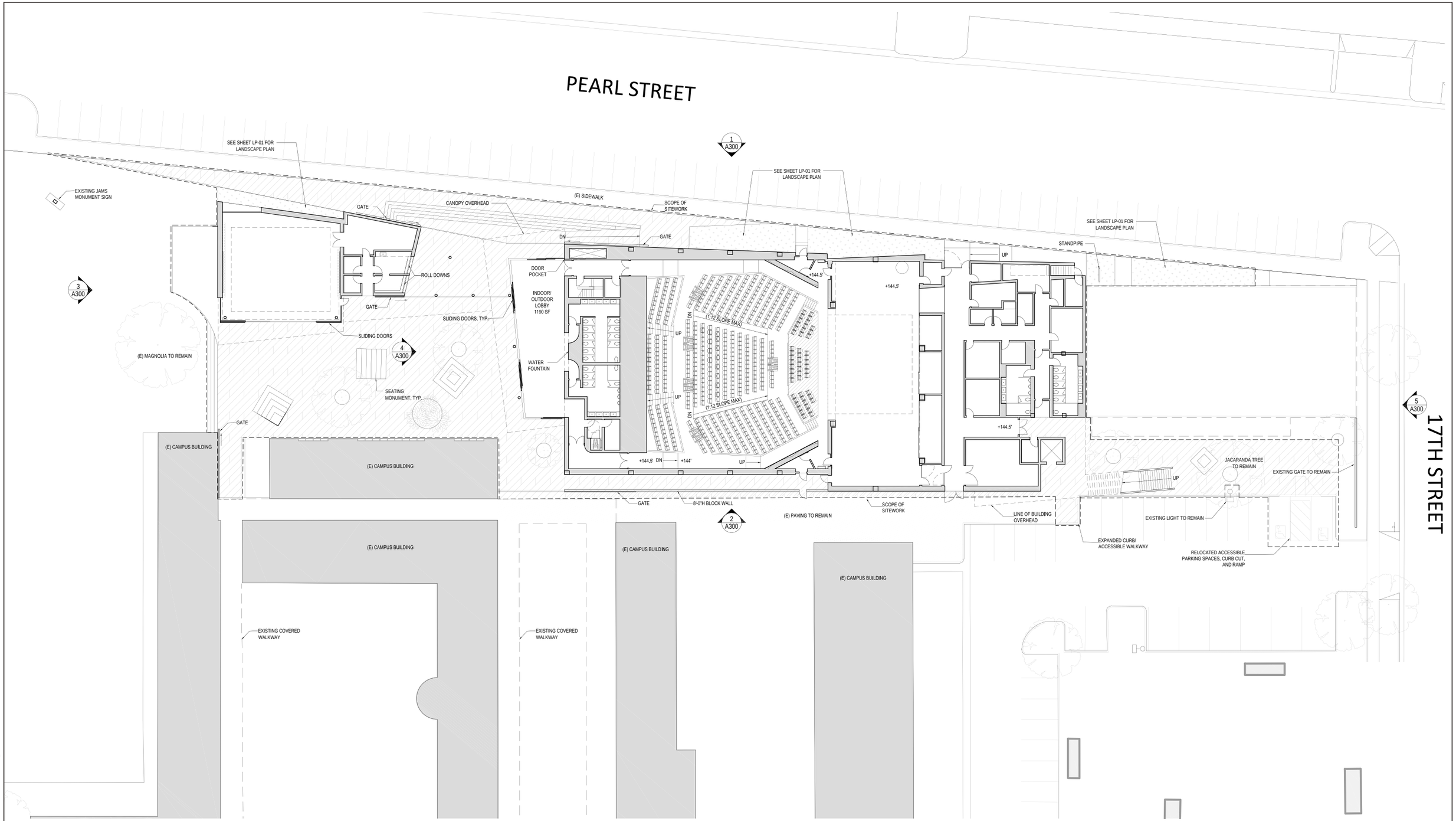
The proposed project would not increase the existing number of students or faculty and would not add additional uses to the campus that are not currently present. Before the existing auditorium on the JAMS campus was closed for safety concerns, the auditorium was used for JAMS events and was also utilized by outside entities as permitted by the District, such as church groups, community music and dance groups, and Santa Monica College. The auditorium has not supported such uses for the past four years. Upon implementation of Phase 1 of the project, which includes construction of the new auditorium, use of the auditorium for both JAMS events and outside events would commence. The frequency of events held at the new auditorium is expected to increase relative to the previous scheduling. Appendix F2 (the operational transportation analysis) presents an events calendar showing the events expected to occur during operation of the proposed project and a sample of the events that occurred before the auditorium closed, for comparison. Many events (particularly those that are not associated with JAMS programs) are expected to occur on weekends and holidays. Weekday events by outside groups, such as Santa Monica College, where the auditorium is likely to be at capacity are expected to occur fewer than 10 days per year.

2.4 Required Permits and Approvals

The District is the lead agency for the proposed project. In order to approve the proposed project, the District's Board of Education (Board) must first adopt this MND. The Board will consider the information contained in the MND in making its decision to approve or deny the proposed project. The following approvals may also be required from other agencies prior to implementing the proposed project:

- Division of the State Architect – Approval of Construction Drawings

- State Water Resources Control Board – The District must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System Permit
- City of Santa Monica Fire Department – Approval of Site Plan for Emergency Access
- City of Santa Monica Public Works/Engineering – Grading Permit



SOURCE: HGA Architects, 2017

FIGURE 2-1

Site Plan - Phases 1 and 2

John Adams Middle School Auditorium Replacement Project

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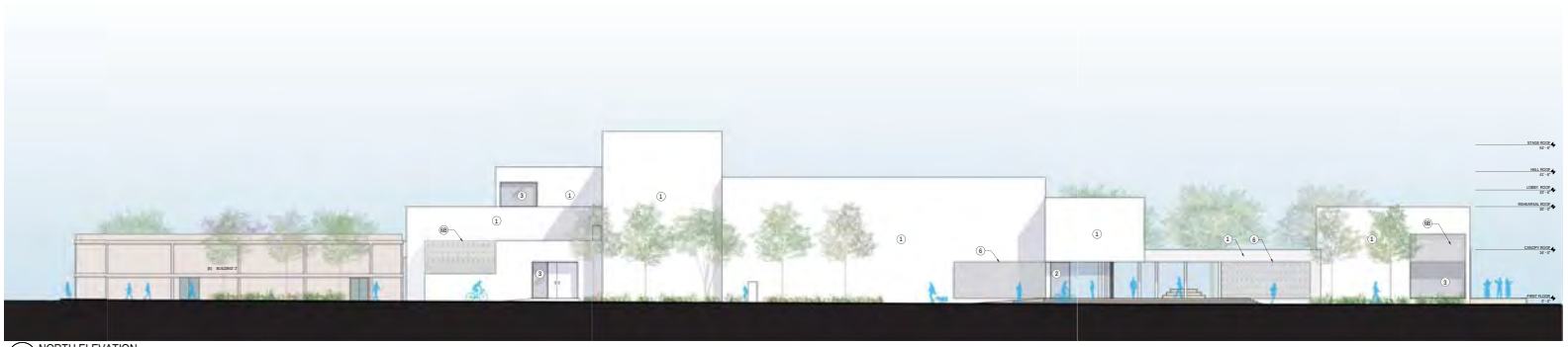
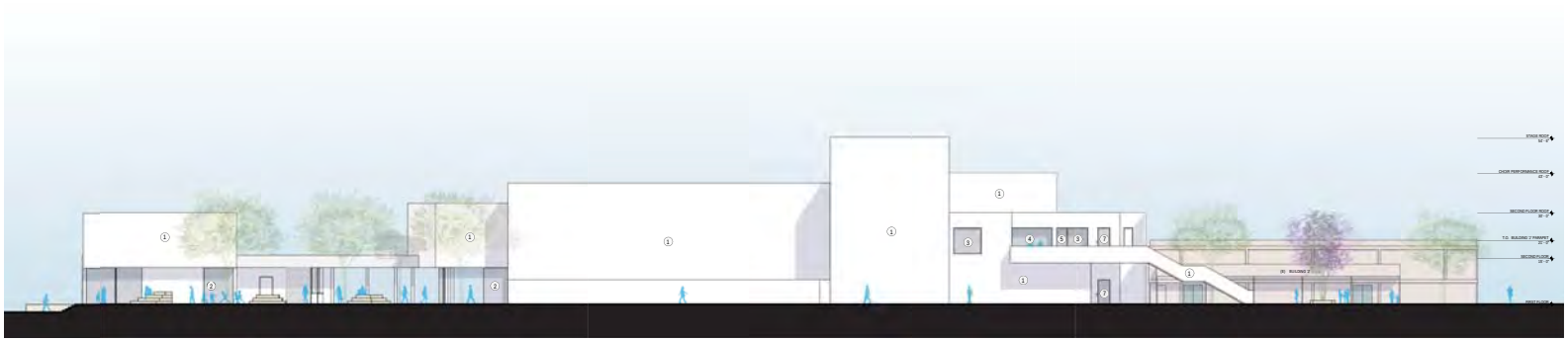
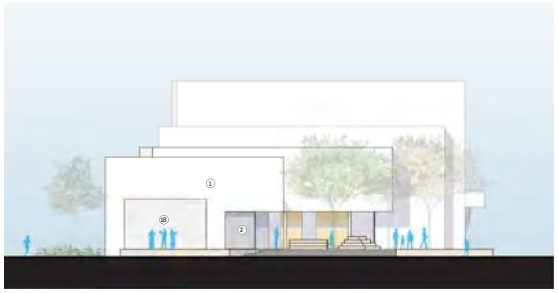


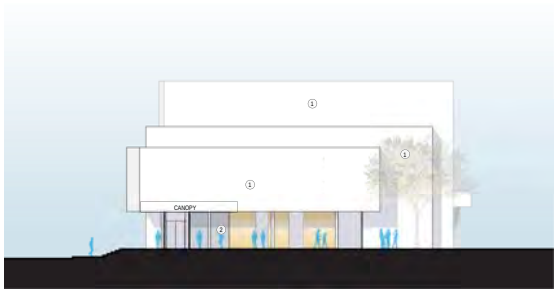
1 NORTH ELEVATION
1/16" = 1'-0"



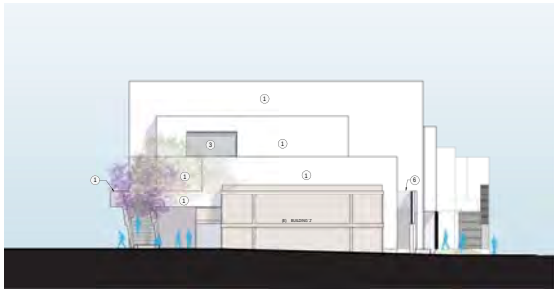
2 SOUTH ELEVATION
1/16" = 1'-0"



3 WEST ELEVATION - REHEARSAL
1/16" = 1'-0"



4 WEST ELEVATION - LOBBY
1/16" = 1'-0"



5 EAST ELEVATION
1/16" = 1'-0"

SOURCE: HGA Architects, 2017

DUDEK

FIGURE 2-2

Elevations - Phases 1 and 2

John Adams Middle School Auditorium Replacement Project

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SOURCE: HGA Architects, 2017

FIGURE 2-3

Conceptual Site Plan - Phase 3

John Adams Middle School Auditorium Replacement Project

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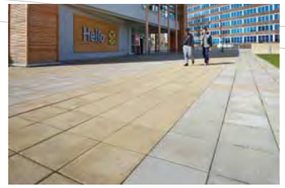
PERMEABLE PAVER EXAMPLES



TIPUANA TIPU
TIP TREE

ACACIA ANEURA
MULGA

JACARANDA ACUTIFOLIA
MIMOSA TREE - EXISTING

DRACAENA DRAGO
DRAGON TREE - EXISTING

MUHLENBERGIA LINDHEIMERI

MUHLENBERGIA CPILLARIS
MISCANTHUS 'MORNING LIGHT'

MIXED SUCCULENTS

PLANT MATERIALS

SOURCE: HGA Architects, 2017

FIGURE 2-4

Landscaping - Phases 1 and 2

John Adams Middle School Auditorium Replacement Project

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3 INITIAL STUDY CHECKLIST

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the State CEQA Guidelines (2017) to determine if the proposed project may have a significant effect on the environment.

1. Project title:

John Adams Middle School Auditorium Replacement Project

2. Lead agency name and address:

Santa Monica-Malibu Unified School District
1651 16th Street
Santa Monica, California 90404

3. Contact person and phone number:

Carey Upton, Chief Operations Officer
Santa Monica-Malibu Unified School District
310-399-5865 x79383
cupton@smmusd.org

4. Project location:

2425 16th Street
Santa Monica, California 90405

5. Project sponsor's name and address:

Santa Monica-Malibu Unified School District
1651 16th Street
Santa Monica, California 90404

6. General plan designation:

Institutional/Public Lands

7. Zoning:

Institutional/Public Lands (PL)

8. Description of project:

Refer to Chapter 2.0 of this MND

9. Surrounding land uses and setting:

Refer to Section 1.3 of this MND

10. Other public agencies whose approval is required:

Refer to Section 2.4 of this MND

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Refer to Section 3.17 of this MND for additional details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

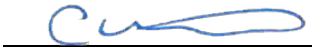
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



Signature

3/15/18

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

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

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project**:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact. The proposed project would involve changes to the appearance of the project site, due to the replacement of the existing auditorium, renovation of the music building, construction of a new rehearsal building and terrace, and replacement of the music building. The new auditorium would be slightly taller than the existing auditorium, and the project would result in an overall increase in building massing at the project site. Visual changes at a site, such as an increase in heights and massing, has the potential to block or compromise vistas that are available from or through a site. However, for the reasons enumerated below, the proposed visual changes at the project site would not obstruct or compromise a scenic vista, since none can be observed from or through the site.

Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. There are a variety of scenic resources within the City of Santa Monica, such as the bay and ocean, the Palisades bluffs, and the pier. The Santa Monica (I-10) Freeway, Pacific Coast Highway (PCH), and Ocean Avenue are identified by the City as scenic corridors from which views of these resources can be observed. The proposed project is located approximately 1.5 miles inland from the coastline, the pier, Ocean Avenue, and PCH. Views of the bay, the ocean, and the pier are not available from or through the project site. Additionally, the site is separated from Ocean Avenue and PCH by continuous urban development, and views of the project site are not available from these roadways. Additionally, the project site is approximately 0.5 mile south of the I-10 Freeway and is separated from the I-10 Freeway by urban development. As such, development at the

project site would not be visible from the 1-10 Freeway and would not interfere with views that can be experienced from the I-10 Freeway.

In summary, due to the urbanized nature of the project area and the relatively flat terrain surrounding the project site, views that can be observed from and/or through the project site consist of the immediately surrounding residential and institutional development and roadways, none of which present scenic resources or views. For the reasons described above, the proposed project would have **no impact** on scenic vistas.

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

No Impact. The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2011). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 20 miles northeast of the project site. Due to this distance, the proposed project site is not within the viewshed of this State Scenic Highway. Therefore, **no impact** on scenic resources within a state scenic highway would occur as a result of implementing the proposed project.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. As described in Section 3.1(a), the proposed project would involve changes to the appearance of the project site, due to the replacement of the existing auditorium, renovation of the music building, construction of a new rehearsal building and terrace, and replacement of the music building. The new auditorium would be slightly taller than the existing auditorium, and the project would result in an overall increase in building massing at the project site. In the northwestern corner of the project site, the existing lawn area would be removed for the development of the proposed single-story rehearsal building and terrace. As such, views of the project site as observed from surrounding areas (namely, 16th Street, 17th Street, Pearl Avenue, and areas within the JAMS campus) would change upon implementation of the project. However, the visual character and quality of the project site and its surroundings would not be substantially degraded by these changes. The project site would remain used for performing arts purposes. Upon project completion, the position of the performing arts structures would not substantially change. Under existing conditions, the site is almost fully built out, with the exception of the lawn. Under the proposed project, the site would remain mostly built out. The remainder of the lawn to the west of the project site boundary would remain, and the mature magnolia tree that is prominently visible on the northwest corner of the project site would also remain. For these reasons, the proposed project would not have the potential to substantially degrade the visual character or quality of the site and its surroundings, and impacts would be **less than significant**. No mitigation is required.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project site is located in an urbanized area on an existing school campus. The streets adjacent to the project site (Pearl Street, 16th Street, and 17th Street) are illuminated with streetlights at night. The JAMS campus interior, including the project site, contains wayfinding lights for pathways and safety in a manner typical of a school campus. The Santa Monica College sports stadium is located immediately north of the project site, on the north side of Pearl Street. When in use, lighting at the nearby stadium may increase nighttime lighting levels at the project site. As such, the project site is located in a generally lit area, characteristic of a typical urban environment.

Light-sensitive receptors are generally considered to be residential properties, and also may include hotel, hospital, or nursing home uses, where excessive nighttime lighting may affect the use of the property. Residences are located near the project site, the nearest of which are single-family residences on the east side of 17th Street, the closest of which is approximately 80 feet southeast of the project site. The proposed project would involve redevelopment of performing arts structures on a site that is currently used for performing arts purposes within an existing middle school campus. The amount of nighttime lighting that is necessary for the new performing arts structures is not anticipated to substantially differ from the existing lighting at the site or within other areas of the JAMS campus. As such, under normal operating conditions, light from the project site is not anticipated to substantially increase relative to existing conditions, such that nighttime views in the area would be substantially affected. However, the number of evening events and evening events with outdoor performances may increase as part of the proposed project. The increase in evening performances and outdoor evening performances may involve temporary and periodic increases in nighttime lighting on the evening of a performance. However, evening events would not occur on a daily basis. And, when such events are held, they would conclude by 10:00 p.m. at the latest. Because the streets surrounding the project site are already illuminated by streetlights, any additional outdoor illumination that is necessary for evening events would be confined to the project site and is not anticipated to substantially increase illumination on surrounding streets or properties. The project site is located in an urbanized area and is also situated within proximity to land uses that are often illuminated at night, such as the Santa Monica College campus and associated sports stadium across the street from the project site. For these reasons, any minor increases in nighttime light and glare associated with the proposed project are not anticipated to adversely affect nighttime views in the project area.

Glare can also be produced during the daytime. Daytime glare is typically caused by reflective building materials, such as glass, stainless steel, aluminum, and photovoltaic panels. Building materials for the proposed project would consist primarily of acrylic cement plaster or fine sand finish, which would be used for the main outside walls of the proposed structures and are not considered highly reflective materials. Some of the architectural elements that are proposed, such as sliding glass doors, may result in a limited source of glare. However, these

elements would not compose a majority of the structures and would be interspersed amongst the more prominent non-reflective surfaces. Furthermore, the sliding glass doors would primarily be situated along the north and south elevations of the proposed rehearsal building where sunlight is limited. The rehearsal building would be one story in height; as such, the sliding glass doors would not be visually prominent. Additionally, the doors would face Pearl Street to the north and the proposed terrace to the south. As such, in the event that some glare were to result, it would not adversely affect the residential sensitive receptors to the east and would generally be screened by the terrace and by the parked cars and landscaping that line Pearl Street. For these reasons, the proposed project is not anticipated to introduce a new substantial source of glare to the project area such that daytime views are adversely affected. In summary, the proposed project is not anticipated to produce new sources of light and glare such that daytime or nighttime views are substantially compromised. Impacts would be **less than significant**. No mitigation is required.

References

Caltrans (California Department of Transportation). 2011. California Scenic Highway Mapping System. Last updated September 7, 2011. Accessed February 1, 2017. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

3.2 Agriculture and Forestry Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The project site is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as mapped by the Farmland Mapping and Monitoring Program (FMMP 2016). Therefore, the proposed project would not convert Farmland to non-agricultural uses, and **no impact** would occur.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is currently zoned Institutional/Public Lands (PL) (City of Santa Monica 2017). Agricultural uses are not listed as permitted uses or conditionally permitted uses within the PL zone in the City's Zoning Ordinance, and the project site is not under a Williamson Act contract (California Department of Conservation 2016). As such, the proposed project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and **no impact** would occur.

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

No Impact. A described under item 3.2(b), the project site is zoned for public and institutional uses. There are no areas zoned for agricultural or forest land uses within the vicinity of the project site. Therefore, the proposed project would not conflict with existing zoning, or cause the rezoning of forest land, timberland, or timberland production land, and **no impact** would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site is located within a built, urbanized area and no forest lands exist within the project vicinity. As such, the proposed project would not result in loss of forest land or conversion of forest land to non-forest use, since forest land is not present on the project site. **No impact** would occur.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. No agricultural resources or operations currently exist on or near the project site, which is located in an urbanized area. Therefore, the proposed project would not involve changes in the existing environment that would result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. **No impact** would occur.

References

California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed January 5, 2018. http://www.consrv.ca.gov/dlrp/lca/Pages/Index.aspx.

City of Santa Monica. 2017. Santa Monica Zoning. Web Mapping Application. Last updated 2017. Accessed January 3, 2018. http://www.arcgis.com/home/webmap/viewer.html?webmap=7a65c2c884b241938011c9c702ee697c&extent=-118.5249,33.9979,-118.4161,34.052.

FMMP (Farmland Mapping and Monitoring Program). 2016. Los Angeles County Important Farmland 2016. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. Published July 2017. Accessed January 5, 2018. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact with Mitigation Incorporated. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board on March 3, 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases (GHGs) and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.

- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion regarding the project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed under Section (b), below. As discussed in Impact AQ-2, the project would result in an exceedance of the SCAQMD threshold for NO_X during construction. The project would not exceed the SCAQMD thresholds for VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ during operation. Because the project would exceed the SCAQMD NO_X threshold during construction, the project could result in an increase in the frequency or severity of existing air quality violations and could conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook. Detailed results of this analysis are included in Appendix A.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and potential to generate population growth. In general, projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017). The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

As discussed in Section 1.3, the project site has a General Plan land use designation of Institutional/Public Lands and a zoning designation of Institutional/Public Lands. The proposed project is consistent with the existing land use designation and does not propose a change in land use designation. Furthermore, the proposed project would not increase enrollment or staffing at the school. Accordingly, the proposed project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, regarding Consistency Criterion No. 2, implementation of the proposed project would not exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the proposed project would also be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2016 RTP/SCS. Thus, the project would not conflict with Consistency Criterion No. 2. However, regarding Consistency Criterion No. 1, the project could result in an increase in the frequency and severity of existing air quality violations associated with NO_X emissions generated during project construction and could,

therefore, conflict with Consistency Criterion No. 1. Based on these considerations, impacts related to the proposed project's potential to conflict with or obstruct implementation of the SCAQMD 2016 AQMP could be potentially significant.

To reduce NO_X emissions generated during project construction, mitigation measure **MM-AQ-1** is required. See Section 3.3(b), below, for the requirements of implementing mitigation measure **MM-AQ-1**.

As presented in Section 3.3(b), the incorporation of mitigation measure **MM-AQ-1** would reduce project-generated NO_X emissions below the SCAQMD NO_X construction mass daily threshold. Therefore, with mitigation, the proposed project would not conflict with, or obstruct implementation of, the SCAQMD 2016 AQMP. Impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact with Mitigation Incorporated. A quantitative analysis was conducted to determine whether proposed project construction and operational activities would result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include O_3, nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), $PM_{2.5}$, and lead. Pollutants that are evaluated herein include VOCs and NO_x, which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[1] the SCAB is designated as a nonattainment area for federal and state O_3 standards, and federal and state $PM_{2.5}$ standards (CARB 2017; EPA 2017). The SCAB is designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO_2 standards, and state SO_2 standards. Although the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard.[2]

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in March 2015,

1 An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards are set by the EPA and CARB, respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; Attainment/Maintenance = achieve the standards after a nonattainment designation; Nonattainment = does not meet the standards.

2 The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality under project-level and cumulative conditions (SCAQMD 2015). The quantitative air quality analysis provided herein applies the SCAQMD thresholds to determine the potential for the project to result in a significant impact under CEQA. The SCAQMD mass daily construction thresholds are as follows:

- 75 pounds per day for VOC
- 100 pounds per day for NO_x
- 550 pounds per day for CO
- 150 pounds per day for SO_x
- 150 pounds per day for PM_{10}
- 55 pounds per day for $PM_{2.5}$

The SCAQMD mass daily operational thresholds are as follows:

- 55 pounds per day for VOC
- 55 pounds per day for NO_x
- 550 pounds per day for CO
- 150 pounds per day for SO_x
- 150 pounds per day for PM_{10}
- 55 pounds per day for $PM_{2.5}$

The following discussion quantitatively evaluates project-generated construction and operational impacts that would result from implementation of the proposed project.

Construction Emissions

Construction of the proposed project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

Criteria air pollutant emissions associated with temporary construction activity were quantified using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2,[3] consistent with the SCAQMD guidance. Construction emissions were calculated for the estimated worst-case day over the construction period associated with each phase and reported as the maximum daily emissions estimated during each year of construction (2018 through 2022). Construction schedule assumptions, including phase type, duration, and sequencing, were based on information provided by the District and default values provided in CalEEMod were used where detailed project information was not available.[4] The assumptions are intended to represent a reasonable scenario based on the best information available.

To estimate project emissions, and based on information provided by the District, it is assumed that construction of the project would begin in June 2018 and would last approximately 44 months, ending in February 2022. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

Phase 1

- Demolition for New Auditorium: 3 months (June 2018 – August 2019)
- Remodel of Building J: 3 months (June 2018 – August 2019)
- Site Preparation for New Auditorium: 2 months (August 2019 – September 2019)
- Grading for New Auditorium: 2 months (August 2019 – September 2019)
- Trenching for New Auditorium: 2 months (August 2019 – September 2019)
- Remodel of Building J Architectural Coating: 2 months (August 2019 – September 2019)
- Building Construction for New Auditorium: 8 months (October 2019 – May 2020)
- Architectural Coating for New Auditorium: 6 months (June 2020 – November 2020)

Phase 2

- Site Preparation for Rehearsal Rooms: 1 month (May 2020)
- Grading for Rehearsal Rooms: 1 month (May 2020)
- Trenching for Rehearsal Rooms: 1 month (May 2020)
- Building Construction for Rehearsal Rooms: 4 months (May 2020 – August 2020)
- Architectural Coating for Rehearsal Rooms: 4 months (May 2020 – August 2020)

[3] CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria air pollutant and GHG emissions from construction and operation of a variety of land use projects.

[4] Each site component is less than one acre and constructed separately; therefore, default data for sites less than one acre were used.

Phase 3

- Demolition for Music Building: 3 months (August 2020 – October 2020)
- Site Preparation for Music Building: 2 months (November 2020 – December 2020)
- Grading for Music Building: 2 months (November 2020 – December 2020)
- Trenching for Music Building: 2 months (November 2020 – December 2020)
- Building Construction for Music Building: 9 months (January 2021 – September 2021)
- Architectural Coating for Music Building: 4 months (October 2021 – January 2022)

Phase 3 is not anticipated to be begin construction until 2024 at the earliest; however, to present a conservative assumption, Phase 3 was modeled to commence immediately after Phase 2.[5]

The construction phasing, vehicle trip assumptions, and construction equipment mix are shown in Tables 3.3-1 and 3.3-2. For the analysis, it was generally assumed that heavy construction equipment would be operating at the site five days per week (22 days per month) during project construction. Construction would occur between 7:00 a.m. and 5:00 p.m. or between 8:00 a.m. and 6:00 p.m. The potential fluctuation in construction start times and end times would not affect the construction scenario that is analyzed herein, because the assumptions for equipment types, equipment usage, construction workers, and truck trips are not formulated based on the daily allowable construction hours. As such, this analysis applies to either construction timeframe (i.e., 7:00 a.m.–5:00 p.m. or 8:00 a.m.–6:00 p.m.).

Table 3.3-1. Construction Equipment

Construction Phase	Equipment		
	Equipment Type	*Quantity*	*Usage Hours* [1]
Demolition (all phases)	Rubber Tired Dozers	1	1
	Concrete/Industrial Saws	1	8
	Tractors/Loaders/Backhoes	2	6
Building Construction (all phases and remodeling)	Cranes	1	4
	Forklifts	2	6
	Tractors/Loaders/Backhoes	2	8
Site Preparation (all phases)	Graders	1	8
	Tractors/Loaders/Backhoes	1	8
Grading (all phases)	Rubber Tired Dozers	1	1
	Concrete/Industrial Saws	1	8

[5] Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant and GHG emissions (evaluated in Section 3.7) because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Table 3.3-1. Construction Equipment

Construction Phase	Equipment		
	Equipment Type	*Quantity*	*Usage Hours* [1]
Trenching (all phases)	Tractors/Loaders/Backhoes	2	6
	Graders	1	8
	Tractors/Loaders/Backhoes	1	8
Architectural Coating (all phases)	Air Compressors	1	6

Notes: Refer to Appendix A for a detailed equipment list.

[1] As noted in Section 2.2, the City may allow construction to start an hour earlier than the start time that is normally allowable in the City. The usage hours for construction equipment are not formulated based on the time frame of when equipment would be allowed to run; as such, assumptions for usage hours would remain the same whether construction occurs from 7:00 a.m. and 5:00 p.m. or from 8:00 a.m. to 6:00 p.m. The usage hours are standard default values that are based on standard construction practices and processes. The usage hours are generally very conservative, because most equipment pieces are not used throughout an entire day of construction work. Rather, each piece is typically used periodically, intermittently, and may not even be used each day.

Table 3.3-2. Construction Trips

Construction Phase	Vehicle Trips	
	Average Daily Worker Trips	*Total Truck Trips*[a]
Demolition for New Auditorium	8	1,740
Remodel of Building J	12	580
Site Preparation for New Auditorium	8	2,900
Grading for New Auditorium	8	2,900
Trenching for New Auditorium	8	1,450
Remodel of Building J Architectural Coating	8	580
Building Construction for New Auditorium	50	2,175
Architectural Coating for New Auditorium	20	1,160
Site Preparation for Rehearsal Rooms	4	580
Grading for Rehearsal Rooms	4	1,450
Trenching for Rehearsal Rooms	4	580
Building Construction for Rehearsal Rooms	12	580
Architectural Coating for Rehearsal Rooms	4	580
Demolition for Music Building	8	1,740
Site Preparation for Music Building	4	870
Grading for Music Building	4	1,740
Trenching for Music Building	4	580
Building Construction for Music Building	40	1,740
Architectural Coating for Music Building	20	870

Source: Appendix F1 for worker and truck trips.

[a] Estimated total truck trips include haul truck trips to transport material to and from the project site and vendor truck trips for material deliveries. Estimated construction truck trips from the traffic analysis were conservatively assumed to be haul truck trips in CalEEMod, which include a mixture of heavy heavy-duty trucks and medium heavy-duty trucks.

Construction truck trips were based on the traffic analysis prepared for the proposed project (Appendix F1). CalEEMod default trip length values were used for the distances for all construction-related trips.

Implementation of the proposed project would generate criteria air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, and architectural coating application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. The proposed project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during the grading activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites two times per day depending on weather conditions. Internal combustion engines used by construction equipment, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, would also produce VOC emissions; however, the District's contractor would be required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Table 3.3-3 presents the estimated maximum daily construction emissions generated during construction of the proposed project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. These emissions reflect CalEEMod "mitigated" output, which accounts for compliance with SCAQMD Rule 403 (Fugitive Dust) (watering two times daily). Details of the emission calculations are provided in Appendix A.

Table 3.3-3. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions (Unmitigated)

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2018	2.80	33.03	17.39	0.05	2.10	1.54
2019	11.62	144.69	65.88	0.25	14.88	8.71
2020	19.79	132.43	65.25	0.24	14.23	8.29
2021	7.14	84.64	41.59	0.14	52.04	16.61
2022	3.40	3.96	3.17	0.01	0.88	0.29
Maximum Daily Emissions	**19.79**	**144.69**	**65.88**	**0.25**	**52.04**	**16.61**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**Yes**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter;
$PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for complete results.

As shown in Table 3.3-3, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, CO, SO_x, PM_{10}, or $PM_{2.5}$ during construction in all construction years. Daily construction emissions would exceed NO_x thresholds in 2019 and 2020. Due to the estimated exceedance of the NO_x threshold, mitigation measure **MM-AQ-1** will be implemented to reduce emissions below SCAQMD thresholds.

Table 3.3-4 presents project-generated construction emissions with implementation of mitigation measure **MM-AQ-1**.

Table 3.3-4. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions (Mitigated)

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
2018	0.55	13.22	10.22	0.03	0.69	0.21
2019	4.13	97.33	79.76	0.26	9.49	4.25
2020	15.98	90.05	80.24	0.25	9.15	4.12
2021	4.02	49.74	54.17	0.15	47.97	13.40
2022	3.25	3.61	3.19	0.01	0.80	0.22
Maximum Daily Emissions	**15.98**	**97.33**	**80.24**	**0.26**	**47.97**	**13.40**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter;
$PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for complete results.

As shown in Table 3.3-4, emissions of all pollutants will not exceed SCAQMD significance thresholds after implementation of **MM-AQ-1**. As such, during construction, impacts would be **less than significant with mitigation** incorporated. No further mitigation is required.

MM AQ-1 **Tier 4 Interim Equipment.** Prior to the commencement of any construction activities, the Santa Monica-Malibu Unified School District or its designee (i.e., construction contractor) shall provide evidence that for off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted by the Santa Monica-Malibu Unified School District in the event that documentation is provided that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. If a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4

Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards. Before an exemption may be considered by the Santa Monica-Malibu Unified School District, its designee (i.e., construction contractor) shall be required to demonstrate that two construction fleet owners/operators in the Los Angeles Region were contacted and that those owners/operators confirmed Tier 4 equipment could not be located within the Los Angeles region.

Operational Emissions

The proposed project involves development of a 20,000-square foot auditorium, a 5,616-square foot music building, and a 3,100-square foot rehearsal building.[6] Operation of the proposed project would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, area sources (including the use of consumer products), architectural coatings for repainting, landscape maintenance equipment, as well as energy sources, including combustion of natural gas used for space heating. The project would not increase the school's staff or student capacity, and therefore, would not generate new regular daily trips; however, the auditorium would generate approximately 10 annual events. To estimate the maximum daily emissions, 250 round trips (500 one-way trips) per day, which represents the greatest potential daily trips, was assumed consistent with the project's traffic analysis (Appendix F2). Pollutant emissions associated with long-term operations were quantified using CalEEMod. Phase 1 and Phase 2, which includes initial renovation of the music building, auditorium, and new rehearsal building, were modeled separately from Phase 3, which include an eventual remodel of the music building to increase its size by 884 square feet to a total of 6,500 square feet. Phase 1 is anticipated to be completed in 2022, and therefore, the first full year of operation was modeled as 2023. Phase 3 is not anticipated to initiate construction until 2024 at the earliest; however, consistent with construction, Phase 3 was conservatively assumed to have the same operational year as Phases 1 and 2.

Table 3.3-5 presents the maximum daily area, energy, and mobile source emissions associated with operation (year 2023) of Phase 1 and Phase 2 of the project. The values shown are the maximum summer or winter daily emissions results from CalEEMod. Details of the emission calculations are provided in Appendix A.

Table 3.3-5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions (2023) – Phases 1 and 2

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Area	0.64	0.00	0.00	0.00	0.00	0.00
Energy	0.01	0.12	0.10	0.00	0.01	0.01

[6] The auditorium was modeled as an arena. The rehearsal rooms and music building where modeled as classrooms.

Table 3.3-5. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions (2023) – Phases 1 and 2

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Mobile	0.77	3.24	10.06	0.04	3.17	0.87
Total	**1.43**	**3.36**	**10.16**	**0.04**	**3.18**	**0.88**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for complete results. Totals may not sum due to rounding.

As shown in Table 3.3-5, project-generated operational emissions in 2023 would not exceed the SCAQMD thresholds for VOC, NO_x, CO, PM_{10}, and $PM_{2.5}$.

During Phase 3, the music building would be rebuilt and increase in size from 5,616 square feet to 6,500 square feet. The additional 884 square feet is not anticipated to generate additional staff, student, or event capacity; therefore, no mobile emissions were included. Table 3.3-6 presents the operational emissions created by the 884 additional square feet added to the new music building constructed as part of Phase 3, as well as the total operational emissions created by the proposed project.

Table 3.3-6. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions (2023) – Phases 1, 2, and 3 (with Rebuilt Music Building)

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	pounds per day					
Phase 3 Rebuilt Music Building (additional 884 square feet)						
Area	0.02	0.00	0.00	0.00	0.00	0.00
Energy	0.00	0.00	0.01	0.00	0.00	0.00
Rebuilt Music Building Subtotal	**0.02**	**0.00**	**0.01**	**0.00**	**0.00**	**0.00**
Total Emissions (Rebuilt Music Building plus Project[a])						
Phase 1 and 2 Operational Emissions	1.43	3.36	10.16	0.04	3.18	0.88
Phase 3 Rebuilt Music Building	0.02	0.00	0.01	0.00	0.00	0.00
Total	**1.45**	**3.36**	**10.17**	**0.04**	**3.18**	**0.88**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for complete results. Totals may not sum due to rounding. These estimates only include the additional square 884 square feet to be constructed.

[a] Estimated project operational emissions for Phase 1 and Phase 2 from Table 3.3-5.

As shown in Table 3.3-6, the combined daily area, energy, and mobile source emissions would not exceed the SCAQMD operational thresholds for VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. Impacts associated with

project-generated operational criteria air pollutant emissions would be **less than significant**. No mitigation is required during operation.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact with Mitigation Incorporated. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

The SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the project would generate VOC and NOx emissions (which are precursors to O3) and emissions of PM_{10} and $PM_{2.5}$. As indicated in Table 3.3-3, project-generated construction emissions would exceed the SCAQMD emission-based significance threshold for NO_X; however, project construction would not exceed the SCAQMD emission-based significance thresholds for VOC, PM_{10}, or $PM_{2.5}$. Project-generated operational emissions would not exceed the SCAQMD operational thresholds.

As discussed in the analysis of the proposed project's potential to conflict with or obstruct implementation of the applicable air quality plan (Section 3.3(a)), the project could conflict with the SCAQMD 2016 AQMP because the project would exceed the SCAQMD mass daily thresholds for NO_X during construction.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the project site are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be considered speculative. However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD.

Based on the previous considerations, the proposed project could result in a cumulatively considerable increase in emissions of nonattainment pollutants as a result of exceeding the SCAQMD mass daily construction threshold for NO_X. As presented in Section 3.3(b) (Table 3.3-4), the incorporation of mitigation measure **MM-AQ-1** would reduce project-generated NO_X emissions below the SCAQMD NO_X construction mass daily threshold. As such, after the implementation of mitigation measure **MM-AQ-1**, impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated.

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The project site is a middle school. The closest sensitive receptors to the project site include classrooms approximately 30 feet south and southeast of the project site.

Localized Significance Thresholds Analysis

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project site as a result of construction activities. The project site is located in Source-Receptor Area (SRA) 2 (Northwest Coastal LA County). The impacts were analyzed using methods consistent with those in the SCAQMD's *Final Localized Significance Threshold Methodology* (2009).

The project site is approximately 1.07 acres. For the purposes of the LST analysis a one-acre site was assumed, which is the smallest acreage provided in the SCAQMD lookup tables. The nearest sensitive-receptor land uses (classrooms) are located approximately 30 feet south of the project site. As such, the LST receptor distance was assumed to be 82 feet (25 meters), which is the shortest distance provided by the SCAQMD lookup tables. In summary, this analysis applies the SCAQMD LST values for a one-acre site within SRA 8 with a receptor distance of 25 meters.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis consistent with the *Final Localized Significance Threshold Methodology*, which states that "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2009).

The maximum daily on-site construction emissions generated during construction of the proposed project is presented in Table 3.3-7, and compared to the SCAQMD localized significance criteria for SRA 2, to determine whether project-generated on-site construction emissions would result in potential LST impacts. As shown in Table3.3-7, LST impacts would be less than significant.

Table 3.3-7. Localized Significance Thresholds (LST) Analysis for Project Construction

Pollutant	On-Site Emissions (pounds/day)	LST Threshold (pounds/day)	Exceeds LST?
NO_2	24	103	**No**
CO	15	562	**No**
PM_{10}	3	4	**No**
$PM_{2.5}$	2	3	**No**

Source: SCAQMD 2008.

Notes: See Appendix A for detailed results. These estimates reflect control of fugitive dust required by Rule 403.

LST = localized significance threshold; NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter; $PM_{2.5}$ = fine particulate matter

These emissions reflect CalEEMod "mitigated" output, which accounts for compliance with SCAQMD Rule 403 (Fugitive Dust) (watering two times daily).

Greatest on-site NO_2 and CO emissions are a result of demolition of the auditorium. Greatest PM_{10} and $PM_{2.5}$ on-site emissions are a result of site prep and trenching for the new auditorium.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable level of service (LOS) (LOS E or worse is unacceptable).

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. To verify that the proposed project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. The traffic analysis (Appendix F2) evaluated whether there would be a decrease in the level of service (LOS) (i.e., increased congestion) at the intersections affected by the proposed project. The potential for CO hotspots was evaluated based on the results of the traffic analysis prepared for the proposed project. The California Department of Transportation Institute of Transportation Studies *Transportation Project-Level Carbon Monoxide Protocol* (CO Protocol; Caltrans 2010) was followed. CO hotspots are typically evaluated when: (1) the LOS of an intersection decreases to LOS E or worse; (2) signalization and/or channelization is added to an intersection; and (3) sensitive receptors such as residences, schools, and hospitals are located in the vicinity of the affected intersection or roadway segment. The

project's traffic analysis evaluated six intersections under PM peak hours for those nights when there are special events. The proposed project would not increase facility positions or student enrollment, and therefore, is not anticipated to affect LOS the majority of the time.

As determined by the traffic analysis, the intersections under the existing and existing-plus-project scenarios operate at LOS A, B or C, except for the intersection of 16th Street and Ocean Park Boulevard, which currently operates at LOS F. The project would adversely affect the LOS during infrequent special events; however, the traffic analysis determined that a signal is warranted under existing (without project) conditions, which would improve the intersection level of service. However, the City of Santa Monica does not require signalization as a mitigation measure.

The proposed project would not generate regular traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots, and the addition of the estimated 10 special events annually, does not change the signal warrant recommendations or trigger mitigation. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Based on these considerations, the proposed project would result in a less-than-significant impact to air quality with regard to potential CO hotspots.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed previously, the nearest sensitive receptors to the proposed project are classrooms located approximately 30 feet from the proposed construction area.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment (OEHHA) risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of one or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.[7] TACs that would potentially be emitted during construction activities associated with development of the proposed project would be diesel particulate matter.

[7] Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a CARB Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM_{10} (representative of diesel particulate matter) exposure would be minimal. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, the duration of the proposed construction activities would only constitute a small percentage of the total 30-year exposure period. The construction period for the proposed project would be approximately 44 months, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.[8]

The project does not propose routine operational activities following completion of on-site construction activities that would generate TAC emissions. Operation of the proposed project would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators) or result in an increase in diesel vehicles (i.e., delivery trucks) over existing baseline conditions.

The proposed project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the project site, and impacts would be less than significant.

Health Impacts of Criteria Air Pollutants

Construction of the proposed project would result in emissions that would not exceed the SCAQMD thresholds for criteria air pollutants including VOCs, CO, SO_X, PM_{10}, or $PM_{2.5}$. However, the SCAQMD threshold for NO_X would be exceeded during construction.

VOCs and NO_X are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The health effects associated with O_3 are generally associated with reduced lung function. The contribution of VOCs and NO_X to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind from the source location to allow time for the photochemical reactions to occur. However, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur because exceedances of the O_3 ambient air quality standards tend to occur between April and October when solar radiation is highest. The holistic effect of a single project's emissions of O_3 precursors is speculative because of the lack of quantitative methods to assess this impact. Nonetheless,

[8] Based on coordination with the SCAQMD, a refined construction health risk assessment was determined to not be required, as project construction would not exceed a duration of five years (Wong 2016).

because NO_X emissions associated with project construction would exceed the SCAQMD mass daily construction threshold, it could minimally contribute to regional O_3 concentrations and the associated health impacts. Accordingly, impacts would be considered potentially significant.

Construction of the project would not exceed thresholds for PM_{10} or $PM_{2.5}$ and would not contribute to exceedances of the NAAQS and CAAQS for particulate matter or would obstruct the SCAB from coming into attainment for these pollutants. The project would also not result in substantial diesel particulate matter emissions during construction, and therefore, would not result in significant health effects related to diesel particulate matter exposure. Because of the minimal contribution of particulate matter during construction, health impacts area considered to be a less than significant impact.

Although project construction would generate NO_X emissions that would exceed the SCAQMD mass daily thresholds, construction of the proposed project is not anticipated to contribute to exceedances of the NAAQS and CAAQS for NO_2 because the SCAB is designated as in attainment of the NAAQS and CAAQS for NO_2 and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards. Health impacts that result from NO_2 and NO_X include respiratory irritation; however, there are no nearby receptors to be affected by off-road construction equipment. Therefore, potential health impacts associated with NO_2 and NO_X would be considered less than significant.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. CO hotspots were discussed previously as a less-than-significant impact. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant.

Mitigation measure **MM-AQ-1** would be required to reduce project-generated construction NO_X emissions and associated potential impacts. As presented in Section 3.3(b), the incorporation of mitigation measure **MM-AQ-1** would reduce project-generated NO_X emissions below the SCAQMD NO_X construction mass daily threshold. Therefore, with mitigation measure **MM-AQ-1**, the proposed project would not contribute to the adverse health effects related to the SCAB's nonattainment status of O_3. Impacts would be **less than significant with mitigation incorporated**. No further mitigation is required.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Therefore, impacts associated with odors during construction would be **less than significant**. No mitigation is required.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The proposed project entails operation of a school and would not result in the creation of a land use that is commonly associated with odors. Therefore, project operations would result in an odor impact that is **less than significant**. No mitigation is required.

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3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The project site is developed with an auditorium, a music building, and a landscaped lawn area. The project site is situated in an urbanized environment. The nearest naturalized areas are the Pacific Ocean, the associated intertidal zone, and the Santa Monica Mountains. The project site is located approximately 1.5 miles from the Pacific Ocean and intertidal zone and approximately 4 miles from the Santa Monica Mountains. The project site is separated from these naturalized areas by urban development and major roadways. Vegetation on the project site is limited to the lawn and several shrubs and trees that are situated along the perimeter of the existing performing arts structures. Trees on the project site include two Mexican fan palms near the entrance to the auditorium and several other planted trees situated along the rear (i.e., south-facing) sides of the auditorium and music building, including a jacaranda tree. A mature magnolia tree is in the center of the existing grass lawn, to the west of the project site boundary. Additionally, street trees are present along 16th Street and 17th Street near the project site. As such, vegetation is present within and near the project site; however, it is sparse and does not constitute suitable habitat for special-status species. The existing grass lawn, palm trees, shrubs, and nearby trees are landscape in function and do not form a natural community or constitute a habitat area that would be considered suitable to support special-status species. As such, the project site is not expected to support any candidate, sensitive, or special status species.

A search of the California Natural Diversity Database (CNDDB), which is maintained and compiled by the California Department of Fish and Wildlife (CDFW), and United States Fish and Wildlife Service (USFWS)

species occurrence database was conducted to further ensure that no special-status species would be expected to occur at the project site. The search was conducted for the project site and a 3-mile radius around the project site. The USFWS database search identified the western snowy plover (*Charadrius nivosus nivosus*; federally threatened (FT)) within the search radius. The species was identified at Santa Monica State Beach and at Venice Beach (USFWS 2017). Habitat for the western snowy plover consists of coastal sand dunes. The project site is located approximately 1.5 miles from the coast, is fully developed, and does not support any sand dunes. As such, the project site is not expected to support western snowy plover. The CNDDB search results identified a number of special-status plant and wildlife species that have been previously sited within the 3-mile search radius of the project site. The special-status plants that were identified consist of Ventura Marsh milk-vetch (*Astragalus pycnostachyus var. lanosissimus*; state and federally endangered (SE/FE) California Rare Plant Rank (CRPR) 1B.1); Parish's brittlescale (*Atriplex parishii*, CRPR 1B.1); salt spring checkerbloom (*Sidalcea neomexicana*, CRPR 2B.2); salt marsh bird's-beak (*Chloropyron maritimum ssp. maritimum*, SE/FE, CRPR 1B.2); coastal dunes milk-vetch (*Astragalus tener var. titi*, SE/FE, CRPR 1B.1); Coulter's saltbush (*Atriplex coulteri*, CRPR 1B.2); south coast saltscale (*Atriplex pacifica*, CRPR 1B.2); and beach spectaclepod (*Dithyrea maritima*, state threatened (ST), CRPR 1B.1) (CDFW 2017a, 2018).

These special-status plants would not be anticipated to occur on the project site because the project site is fully developed with structures, hardscaping, and landscaping primarily consisting of non-native grass and shrubs. The site has been developed for over 50 years and does not support native soils or areas where special-status plant species would be expected to occur. The special-status wildlife species that were identified are as follows: western mastiff bat (*Eumops perotis californicus*, state species of special concern (SSC)); Swainson's hawk (*Buteo swainsoni*, ST); least Bell's vireo (*Vireo bellii pusillus*, SE/FE and SSC); silver-haired bat (*Lasionycteris noctivagans*, SSC); and monarch butterfly overwintering population (*Danaus plexippus*, special animal (SA)) (CDFW 2018). While certain bat species are known to inhabit vacant buildings in urban environments, the species that were previously identified within the 3-mile search radius of the project site (western mastiff bat and silver-haired bat) generally require native, naturalized habitats. As such, the project site does not contain suitable habitat for these special-status bat species. Swainson's hawk would be unlikely to occur in the vicinity of the project site, as the only current known breeding population is located in the Antelope Valley, approximately 50 miles north of the project site. Least Bell's vireo is generally found in riparian environments, but may also be found in palm groves, arroyos, and hedgerows (Kus 2002). The project site does not contain any riparian habitat. While the project site and nearby areas are planted with isolated palms and hedges, palm groves, arroyos, or hedgerows are not present. As such, the least Bell's vireo is unlikely to occur on the project site or in the vicinity of the project site. Monarch butterflies are known to overwinter in eucalyptus groves. While several eucalyptus trees are located along Pearl Street to the east of the project site, these trees are not situated within a grove; rather, they are street trees that are separated from one another and are situated adjacent to the Santa Monica College campus. The project site itself does not support a eucalyptus grove. As such, monarch butterfly populations would not be expected to overwinter at

the project site or within the vicinity of the project site, such that their overwintering activities would become adversely affected by the proposed project. Wildlife species expected to occur on-site, if any, would be limited to terrestrial species that are commonly found in urban environments, such as birds and squirrels that are not special-status species. For these reasons, the project site is not expected to support any candidate, sensitive, or special-status species. Therefore, redevelopment and renovation activities on the project site would not have a substantial, adverse effect on such species.

While several naturalized areas are within the region of the project site (i.e., the Pacific Ocean, the intertidal zone, and the Santa Monica Mountains), development at the site would not affect any special-status species or suitable habitat present within these areas, due to the intervening distance and urban development that lies between these naturalized areas and the project site. For these reasons, the proposed project would not have a substantial adverse effect on any sensitive or special status species and **no impact** would occur.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. As described in Section 3.4(a), the project site supports a grass lawn, shrubs, and several landscaping trees. Nearby streets (16th Street and 17th Street) are lined with street trees, and several mature trees are present in areas of the JAMS campus adjacent to the project site. The existing grass lawn, shrubs, and landscaping trees do not constitute a sensitive natural community. There are no wetlands or riparian habitat areas located on or within the vicinity of the project site, as mapped by the U.S. Fish and Wildlife Service in the National Wetlands Inventory. The nearest wetland feature is the intertidal zone associated with the Pacific Ocean, which is located approximately 1.5 miles from the project site (USFWS 2018). Due to the intervening distance and urban development that lies between the intertidal zone and the project site, the proposed project would not have an effect on the intertidal zone. For these reasons, **no impact** to sensitive natural communities from the proposed project would occur, as none exist in the project area.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. There are no wetlands located on or adjacent to the project site (USFWS 2018). As such, the proposed project would have **no impact** on federally protected wetlands.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact with Mitigation Incorporated. There are no wetlands or running waters within the project area, and therefore, the proposed project would have no potential to affect the movement of migratory fish. The project site is located within a developed, urbanized area and is therefore not part of a wildlife corridor.

The landscaping that is within and adjacent to the project site could provide potential nesting sites for birds that are protected under Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and under the Migratory Bird Treaty Act (1918). The proposed project would involve removal of several existing landscaping trees that are currently located on the project site. In the event that a bird is nesting in the trees at the time they are being removed, the process of removing the tree could adversely affect the bird(s) by harming, harassing, or killing bird(s) or their eggs, which is a violation of the Migratory Bird Treaty Act. Construction activities would also elevate noise levels and could cause disturbance to nesting or roosting of protected species on site or adjacent to the site. No specific season is identified for construction; therefore, construction could occur any time of year, including during the nesting season (i.e., between February 1–August 31). Thus, there is potential for construction activities to negatively affect breeding or reproduction of species on or adjacent to the project site. Implementation of mitigation measure **MM-BIO-1** would result in adequate protection for any nesting birds that could be disturbed during construction.

No operational impacts to nesting birds are anticipated to occur. The trees that would be removed in association with the project are isolated from open space areas, are situated in an urbanized environment, and are subject to noise and high levels of disturbance and human activity, since they are within a middle school campus. These existing trees do not provide robust or highly suitable nesting areas, and similar nesting areas exist throughout the areas surrounding the project site. Furthermore, new trees would be planted on the project site as part of the proposed project (see Figure 2-4). As such, during operation, the project site would continue to provide potential nesting sites within a middle school campus, consistent with existing conditions. Due to the highly developed nature of the project area and upon implementation of mitigation measure **MM-BIO-1** to address potential construction effects, impacts on the movement of native or resident species or on the use of native wildlife nursery sites resulting from the proposed project would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-BIO-1 If construction is scheduled or ongoing during bird nesting season (typically February 1 through September 15), the Santa Monica-Malibu Unified School District shall require that a qualified biologist conduct a nesting bird survey within 250 feet of the construction activity,

within 72 hours prior to the commencement of construction activities. Surveys shall be conducted in accordance with California Department of Fish and Wildlife protocols, as applicable. A copy of the pre-construction survey shall be submitted to the Santa Monica-Malibu Unified School District. If no active nests are identified on or within 250 feet of the construction activity, no further mitigation is necessary. If active nest(s) are identified during the preconstruction survey, a qualified biologist shall flag and demarcate the location of nesting birds and monitor construction activities. Temporary avoidance of active bird nests, including the enforcement of an avoidance buffer of 25 to 200 feet, depending on the sensitivity of the species identified, as determined by the qualified biological monitor, shall be required until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

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

Less Than Significant Impact with Mitigation Incorporated. As described under Section 3.4(a), no suitable habitat for any special-status plant or wildlife species occurs on the project site and no special status/sensitive species are expected to occur on the project site or in surrounding areas. Therefore, redevelopment and renovation activities on the project site would not result in conflict with any policies or ordinances protecting special-status plant or wildlife species, including any endangered, threatened, or rare species, as none are expected to occur on the project site.

The City designates Heritage Trees and Landmark Trees for the purposes of recognition and/or protection. There are no designated Heritage Trees or Landmark Trees on the project site or within the vicinity of the site that would have the potential to be removed or indirectly affected by construction of the project (City of Santa Monica 2018a, 2018b). However, the street trees located along 16th Street and 17th Street near the project site are protected under the City's Tree Code (Chapter 7.40 of the City's Municipal Code), as they are within the parkways along these streets. The Tree Code prohibits removing, trimming, and/or interfering with street trees without a City permit authorizing such work. The street trees that are near the project site would not be removed as part of the project. However, construction activities may occur adjacent to and/or within the vicinity of these street trees. Construction activities would result in increased human and vehicular activity within the vicinity of these trees and also may involve excavation and grading within the vicinity of these trees. Such activities have the potential to adversely affect the health of trees. Section 7.40.160 in the City's Tree Code (Protection of Trees) requires that street trees be protected during construction to avoid potential direct and/or indirect impacts to the trees and their root systems that can result from nearby construction projects. Section 7.40.160 states that "During the erection, repair, alteration or removal of any building, house, or structure in the City, any person in charge of such work shall protect any tree, shrub or plant in any street, sidewalk, parkway, alley or other public property within the City in the vicinity of such

building or structure with sufficient guards or protectors as to prevent injury to said tree, shrub or plant arising out of or by reason of said erection, repair, alteration or removal." The District would be required to protect nearby street trees during construction activities at the project site pursuant to Section 7.40.160. Upon compliance with Section 7.40.160 and implementation of mitigation measure **MM-BIO-2**, the proposed project would not be in conflict with local policies or ordinances protecting biological resources, and impacts would be **less than significant with mitigation incorporated**.

MM-BIO-2 The Santa Monica-Malibu Unified School District shall incorporate best practices to protect and safeguard the adjacent Magnolia tree. Practices may include, but are not limited to, the following: establishing a temporary fence around the outside of the tree's drip line; minimizing the use of equipment within this fenced area; avoiding grade changes within the fenced area; prohibiting the parking of construction equipment within 50 feet of the tree; and, hand-pruning main support or feeder roots, if any are encountered.

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

No Impact. The City is not within any of the regional conservation plans designated by the state (CDFW 2017b). The project site is located in an urban area. As described under Section 3.4(a), no suitable habitat for any special-status plant or wildlife species occurs on the project site and no special status/sensitive species are expected to occur on the project site. As such, there are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans that apply to the project site. Therefore, implementation of the proposed project would not conflict with the provisions of such plans, as none apply to the project site. **No impacts** would occur as a result of implementing the proposed project.

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3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines defines (1) a mandatory historical resource as a resource listed in or determined to be eligible by the State Historic Resources Commission for listing in the California Register of Historical Resources; (2) a presumptive historical resource as a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or (3) a discretionary historical resource as an object, building, structure, site area, place, record, or manuscript which a lead agency determines to be significant in the architectural,

engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. The District has chosen not to conduct its own discretionary review but does acknowledge all mandatory and presumptive historical resources. JAMS is not listed in either the national or California registers; and thus, it is not a mandatory historical resource. The JAMS campus is included in the City of Santa Monica's Historic Resources Inventory (Inventory) as a potential contributor to the Santa Monica Public Schools Potential Thematic District (Potential Historic District). However, Santa Monica notes that the Inventory is a compilation of potential historical resources, and to date, has not declared such as historical resources. Further, currently the Inventory is out of date and the JAMS campus has not been surveyed since 1993. Thus, JAMS is not a presumptive historical resource. However, Santa Monica is in the process of conducting a citywide survey update of its Inventory. It is possible that the survey will be adopted during the processing of this MND. If the Inventory is adopted and JAMS is declared as a historical resource by the City of Santa Monica, the proposed project's impact would be considered prior to approval of the proposed project. Therefore, a Historical Resource Analysis ("Analysis") was prepared by Summit Consultants, Inc. (refer to Appendix B1) to determine if the proposed project would have a significant effect if the campus were declared to be a historical resource. The Analysis determined that the proposed project would "not cause a significant adverse impact to local historical resources or environment." Therefore, development of the proposed project would result in a **less than significant impact** pursuant to Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5 should JAMS be established as a presumptive historical resource. No mitigation is required.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact with Mitigation Incorporated. The CHRIS records search results indicate that no previously conducted studies or previously recorded archaeological resources were identified within the project site. However, 19 previously recorded resources (see Appendix B1) were identified within one-mile of the project site. These include the following five archaeological resources: multi-component refuse deposit (CA-LAN-1061/H); a small prehistoric lithic deposit (CA-LAN-001123); a segment of the Santa Monica Air Line railroad (CA-LAN-003803H); and two historic refuse deposits discovered in excavation (CA-LAN-004294H and CA-LAN-004666H). The remaining resources are all historic built environment resources within the City of Santa Monica and the City of Venice including multi-family residences, single-family residences, schools, industrial buildings, commercial buildings, and a mobile home park from a broad period of development (1900-1970).

A Sacred Lands File search from the California Native American Heritage Commission (NAHC) was requested on July 26, 2017. No response was received, and a second request was sent on February 7, 2018. The NAHC emailed the results on February 8, 2018, which included a list of tribes who should be contacted

for additional information about cultural resources within or near the project site. Dudek mailed letters to Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project site on February 9, 2018. On February 16, Andrew Salas, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation responded via email. Mr. Salas stated that the project site is within the Tribe's Ancestral territory and may have potential for discoveries of cultural resources. Mr. Salas requested that one of the Tribe's Native Monitors be present during any and all ground disturbances. No specific mitigation measures were requested. Documents related to the NAHC Sacred Lands File search are included in Appendix B2.

No archaeological resources were identified within the project site as a result of the CHRIS records search, Native American coordination, or survey. However, because it is always possible that intact archaeological deposits are present at subsurface levels and could be uncovered during ground-disturbing activities, mitigation measure **MM-CUL-3** would be required during construction of the proposed project. With the implementation of mitigation measure **MM-CUL-3**, impacts related to archaeological resources during construction of the proposed project are considered **less than significant with mitigation incorporated**. No further mitigation is required.

MM-CUL-3 In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); California PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work—such as preparation of an archaeological treatment plan, testing, or data recovery—may be warranted.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. The project site is located in the City of Santa Monica, on a relatively flat-lying piece of land south of the I-10 Freeway and west of the Santa Monica Airport. In this area, surface-mapped geological units include a combination of marine terrace and terrestrial fluvial deposits (Dibblee and Ehrenspeck 1991; McLeod 2018). The majority of the project site is mapped as older Quaternary alluvium, consisting of pebbly sand, gravel, and silt, according to published mapping by Dibblee and Ehrenspeck (1991). These Pleistocene, or "Ice-Age" deposits (at least 11,000 years old) occur at the surface across the site (Dibblee and Ehrenspeck 1991; McLeod 2018). Shallow excavations (first few feet) in this developed area are unlikely to impact previously undisturbed sedimentary deposits. However, older,

Pleistocene age deposits in this area have produced scientifically significant vertebrates and have a moderate to high paleontological resource sensitivity (McLeod, 2018).

According to the records search results letter from the Natural History Museum of Los Angeles County, (LACM), no vertebrate fossil localities are documented from the project area. However, past construction-related grading and trenching activities in the area surrounding the project site have encountered paleontological resources. Previously discovered fossils in the area have been in older Quaternary age sedimentary deposits, similar to those which may be impacted during construction. Northeast of the project area, along Michigan Avenue east of Cloverfield Boulevard, LACM 5462 produced a right dentary, or jaw bone, of an extinct lion (Felis atrox), at a depth of 6 feet below the ground surface (bgs) (McLeod, 2018). East-southeast of the project area, fossil specimens of horse (Equus) and ground sloth (Paramylodon) were discovered at locality LACM 7879 at a depth of over 11 feet bgs (McLeod, 2018). Although shallow (less than 5 feet bgs) excavations are unlikely to yield fossils, due to the disturbed and weathered nature of the surficial deposits, there is the potential that at least some fossilized remains may be encountered during grading within the project site.

No paleontological resources were identified within the project site as a result of the institutional records search and desktop geological review. Furthermore, the project site is located within an area that has been previously developed and is likely underlain by fill materials, at least in part. As such, the project site is not anticipated to be underlain by unique geologic features. While the project area has been heavily disturbed by urban development over the years, intact paleontological resources may be present below the original layer of fill material. Given the proximity and shallow depth of past fossil discoveries in the surrounding area and the underlying older alluvial deposits, the project site is moderately to highly sensitive for supporting paleontological resources. In the event that intact paleontological resources are located on the project site, ground-disturbing activities associated with construction of the proposed project, such as grading during site preparation, have the potential to destroy a unique paleontological resource or site. Preliminary design plans for the project indicate construction of a parking structure. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon the implementation of mitigation measure **MM-CUL-4**, impacts would be reduced to below a level of significance. As such, the impacts of the proposed project are considered **less than significant with mitigation incorporated** during construction. No further mitigation is required.

MM-CUL-4 Prior to commencement of any grading activity on-site, the District shall retain a qualified paleontologist, subject to the review and approval of the City's Building Official, or designee. The qualified paleontologist shall attend the preconstruction meeting and be on-site during all rough grading and other significant ground-disturbing activities in previously undisturbed older Quaternary alluvial deposits, if encountered. These deposits may be encountered at depths as shallow as 5 feet below ground surface. In the event that paleontological resources

(e.g., fossils) are unearthed during grading, the paleontology monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery will be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor will remove the rope and allow grading to recommence in the area of the find. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed project. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology (SVP) (2010).

d) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

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

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3.6 Geology and Soils

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

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The District commissioned a geologic hazards review for the project site, which was conducted by Leighton Consulting, Inc. (Leighton) in June 2017 (*Geologic Hazards Review – John Adams Middle School (JAMS) Auditorium Replacement Project – 2425 16th Street, Santa Monica, California*). Leighton found that there are no active or potentially active faults known to cross the project site, and the project site is not located within an Alquist-Priolo Earthquake Fault Zone (Appendix C). The closest known fault to the project site is the Santa Monica Fault, which is located approximately 1.3 miles north of the project site. The City has designated a Fault Hazard Management Zone for this fault, which is located approximately 1 mile north of the project site. The City requires project sites within the Fault Hazard Management Zone to undergo fault studies prior to approval of building permits (Appendix C).

Due to the locations of the mapped faults relative to the project site, Leighton determined that the potential impact of surface fault rupture occurrence at the site is low. Nevertheless, faults have been identified in the vicinity of the site, as described in the paragraph above. In the event of a nearby fault rupture, hazardous conditions could occur at the project site, such as strong ground shaking. However, the proposed project design would be subject to a variety of seismic standards and codes, including the California Building Code. Additionally, the proposed project would be subject to review and plan approval by the Division of the State Architect (DSA). The District would also review project plans to ensure compliance with the latest version of the California Building Code. Compliance with the California Building Code, DSA review and approval, and District review would ensure that the proposed performing arts complex is designed, constructed, and operated to minimize risks associated with rupture of a nearby fault to the extent feasible. Impacts would therefore be **less than significant**, and no mitigation is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As described under Section 3.6(a)(i), the Santa Monica Fault is located approximately 1.3 miles north of the project site. Other active and potentially active faults in the region include the Newport Inglewood Fault, the Palos Verdes Fault, and the Hollywood Fault (Appendix C). Leighton determined that the project site could be subject to strong seismic ground shaking from an earthquake occurring along one or more of the major active or potentially active

faults in the region, resulting in potential hazards at the project site. However, as stated in Appendix C, designing the project in accordance with regulatory requirements and seismic design parameters from the California Building Code would reduce potential impacts associated with strong seismic ground shaking. In Appendix C, Leighton outlines the appropriate seismic design ground motion parameters for new Type III Public School Buildings, which are the applicable standards for the project. As described under Section 3.4(a)(i), the proposed project would be subject to review and plan approval by the DSA. The District would also review project plans to ensure compliance with the latest version of the California Building Code. Compliance with the specified seismic design standards and review and approval of the proposed project plans by the DSA and the District would ensure that the proposed performing arts complex is designed, constructed, and operated to minimize risks associated strong seismic ground shaking to the extent feasible. Impacts would be **less than significant**, and no mitigation is required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. Effects of severe liquefaction can include sand boils, excessive settlement, bearing capacity failures, and lateral spreading. The project site has not been mapped by the state or the City as being potentially susceptible to liquefaction, and the historic high groundwater level at the site is greater than 40 feet below ground surface (CGS 1998 and 1999, as cited in Appendix C; City of Santa Monica 2014, as cited in Appendix C). The site is geologically mapped in an area that is considered to have a low susceptibility for liquefaction (Pleistocene age older paralic deposits). Based on these findings, Leighton found that the potential for liquefaction at the site is considered low.

Leighton also evaluated the potential for seismically induced settlement to occur at the site. Seismically induced settlement consists of dry dynamic settlement (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily within loose to moderately dense sandy soil due to reduction in volume during and shortly after an earthquake event. Based on an analysis of the subsurface soil profile at the JAMS campus, Leighton determined that the risk of seismically induced settlement at the project site is low and that any minor risks of potential hazards associated with settlement can be minimized through remedial earthwork at the site during construction and through compliance with standard structural design requirements for the proposed buildings (Appendix C).

As described under Section 3.4(a)(i), the proposed project would be subject to review and plan approval by the DSA. The District would also review project plans to ensure compliance with the

latest version of the California Building Code. For the reasons described above and upon compliance with required structural design requirements and review and approval of the proposed project plans by the DSA and the District, impacts related to seismic-related ground failure, such as liquefaction and settlement, would be **less than significant**. No mitigation is required.

iv) Landslides?

No Impact. The topography of the site is relatively flat, with a gentle slope to the southwest. As identified by Leighton, the proposed project is not located in an area mapped as potentially susceptible to landslides, and no landslides are mapped or known to exist at the project site or in the vicinity of the site. As identified by Leighton, the potential for slope instability and landslides is not considered a geotechnical hazard for the site, and the potential for seismically induced landslides to affect the site is low (Appendix C). **No impact** pertaining to landslide hazards would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Based on their evaluation of the soil characteristics of the project site, Leighton found that the on-site soils are expected to be moderately susceptible to erosion. On-site materials would be particularly prone to erosion during excavation and site development associated with proposed project construction, especially if construction activities were to coincide with heavy rains. However, Leighton states that the potential for erosion can be minimized through implementation of best management practices for stormwater at construction sites, such as temporary catchment basins and/or sandbagging, which would control runoff and contain sediment transport within the project site during construction. Because the proposed project would involve a construction area greater than one acre, it would require compliance with the Storm Water Construction Activities General Permit, which requires the construction contractor to prepare and comply with a Storm Water Pollution Prevention Plan. Storm Water Pollution Prevention Plans must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. During operation, the site would be covered with structures, hardscape, landscaping, and appropriate drainage infrastructure, which would reduce on-site erosion. Therefore, substantial sedimentation and erosion would not occur during operation. For the reasons described above and upon compliance with required best management practices for stormwater runoff during construction, impacts would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact. As described in Section 3.6(a)(iv), the project site is not located in a landslide hazard area. The areas surrounding the project site are similarly flat and are highly developed. As such, an on-site or off-site landslide is unlikely. As described in Section 3.6(a)(iii), the potential for liquefaction at the project site is considered low. As stated in Appendix C, due to the low potential for liquefaction and the relatively flat nature of the site with no free faces, the potential for lateral spreading to occur at the site is also considered low (Appendix C). Regarding subsidence, regional ground subsidence generally occurs due to rapid and intensive removal of subterranean fluids, typically water or oil. As stated in Appendix C, no reports on regional subsidence have documented subsidence in the site vicinity, and the project would not involve the removal of water or oil at the site. For these reasons, the potential for ground subsidence is low. As described in Section 3.6(a)(iii), the risk of settlement at the project site is low, and any minor risks associated with settlement can be minimized through remedial earthwork at the site during construction and through compliance with standard structural design requirements for the proposed buildings. For these reasons, the project site has not been identified as being located on a geologic unit or soil that is particularly unstable. However, compliance with structural design requirements and review and approval of the proposed project plans by the DSA and the District would ensure that the proposed buildings would be constructed to protect life and property from geotechnical hazards to the extent practicable. Upon compliance with structural design requirements, impacts would be **less than significant**. No mitigation is required.

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

Less Than Significant Impact. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink with the loss of water. Foundations and structures constructed on these soils can be subjected to uplifting forces caused by the swelling, potentially resulting in heaving and cracking of both building foundations and slabs-on-grade. Leighton tested the on-site soils to evaluate the potential for soil expansion to occur and found that the on-site soils have a very low expansion potential. Based on these findings, Leighton determined that standard engineering and earthwork construction practices, such as proper foundation design and proper moisture conditioning of earthen fills, would minimize any potential effects associated with expansive soils. However, Leighton also states that additional testing of soils upon completion of grading or during future geotechnical work should be performed to confirm the results of the testing. Recommendations provided in the *Geologic Hazards Review* (Appendix C of this MND) would be followed by the District. This includes a recommendation for additional testing of soils to confirm that the potential for soil expansion is low. For these reasons and upon compliance with standard engineering and construction practices and regulations, impacts related to risks associated with soil expansion would be **less than significant**. No mitigation is required.

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

No Impact. The proposed project would connect to the existing sewer system and would not involve other alternative wastewater disposal methods. Therefore, **no impact** would occur in association with alternative wastewater disposal systems and soils.

References

None.

3.7 Greenhouse Gas Emissions

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

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

Less Than Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in the earth's energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the earth's surface. The greenhouse effect is a natural process that contributes to regulating the earth's temperature, and it creates a livable environment on earth. Human activities that emit additional greenhouse gases (GHGs) to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code, Section 38505(g), for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (14 CCR 15364.5). The three GHGs evaluated in this MND are CO_2, CH_4, and N_2O.

Gases in the atmosphere can contribute to climate change both directly and indirectly.[9] The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons of CO_2 equivalent (MT CO_2e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH_4 is 25 (emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the IPCC Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3 (Air Quality), the proposed project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

[9] Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2016).

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4. Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per-service population for project-level analyses and 6.6 MT CO_2e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5. Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Section 15064.7(c) of the State CEQA Guidelines specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The State CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the State CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the proposed project's potential to generate GHG emissions that would have a significant impact on the environment, the project's GHG emissions were compared to the quantitative threshold of 3,000 MT CO_2e per year for all non-industrial projects. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). Thus, this impact analysis compares estimated operational emissions plus amortized construction emissions to the proposed SCAQMD threshold of 3,000 MT CO_2e per year.

Construction Emissions

Construction of the proposed project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described in Section 3.3(b) (within the air quality analysis). Construction would occur between 7:00 a.m. and 5:00 p.m. or between 8:00 a.m. and 6:00 p.m. As described in Section 3.3(b), this potential fluctuation in construction times would not affect the construction scenario that is analyzed herein. This analysis applies to either construction timeframe (i.e., 7:00 a.m.–5:00 p.m. or 8:00 a.m.–6:00 p.m.). A detailed depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Appendix A. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 3.7-1 presents construction GHG emissions for the project from on-site and off-site emissions sources.

Table 3.7-1. Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2018	106.50	0.01	0.00	106.80
2019	712.37	0.10	0.00	714.93
2020	887.25	0.13	0.00	890.42
2021	358.73	0.05	0.00	360.00
2022	13.10	0.00	0.00	13.12
Total	**2,077.95**	**0.29**	**0.00**	**2,085.26**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 3-7-1, the estimated total GHG emissions during construction of would be approximately 2,085 MT CO_2e over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 69.51 MT CO_2e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG threshold for construction, the evaluation of significance is discussed in the operational emissions analysis provided below.

Operational Emissions

Operation of the proposed project would generate GHG emissions through motor vehicle trips to and from the project site; landscape maintenance equipment operation; energy use (natural gas and generation of

electricity consumed by the project); solid waste disposal; and generation of electricity associated with water supply, treatment, and distribution and wastewater treatment.[10] CalEEMod was used to calculate the annual GHG emissions. GHG emission estimates were based on the mobile source, area source, and energy (natural gas) operational assumptions described in Section 5(b), within the air quality analysis. The proposed project is not expected to generate regular trips, as the project would not increase student enrolment or facility positions; however, the auditorium is anticipated to support up to ten events full-capacity annually (Appendix F2). Each event is anticipated to generate 250 round trips (500 one-way trips) per event day, which totals 2,500 round trips (5,000 one-way trips) annually. CalEEMod default values were used to estimate GHG emissions associated with energy (electricity) consumption, solid waste, and water and wastewater.

The estimated operational (year 2023) project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, and water usage and wastewater generation are shown in Table 3.7-2.

Table 3.7-2. Estimated Annual Operational GHG Emissions (2023) – Phases 1 and 2

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons Per Year			
Area	0.00	0.00	0.00	0.00
Energy	176.48	0.00	0.00	176.93
Mobile	2.41	0.00	0.00	2.41
Solid waste	2.41	0.14	0.00	5.96
Water supply and wastewater	72.83	0.29	0.01	82.15
Total	254.12	0.43	0.01	267.46
			Amortized Construction Emissions	*69.51*
			Operation + Amortized Construction Total	**336.97**

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent
See Appendix A for detailed results.
These emissions reflect operational year 2019. No mitigation measures were assumed.

As discussed in Air Quality, in 2023, the music building would be rebuilt and increase in size from 5,616 square feet to 6,500 square feet. The new music building would be subject to more stringent, yet to be adopted, building sustainability standards, most notably future iterations of Title 24 Building Standards; however, CalEEMod default values were conservatively assumed. The additional 884 square feet is not anticipated to generate additional staff, student, or event capacity; therefore, no mobile emissions were included. Table 3.7-3 presents operational emissions the 884 additional square feet added to the rebuilt music building in Phase 3, and total operational emissions.

[10] Trip generation from the Traffic Impact Analysis was annualized to reflect average emissions over the year.

Table 3.7-3. Estimated Annual Operational GHG Emissions (2023) – Phases 1, 2, and 3 (with Rebuilt Music Building)

Emission Source	CO_2	CH_4	N_2O	CO_2e
	Metric Tons Per Year			
Phase 3 Rebuilt Music Building (additional 884 square feet)				
Area	0	0	0	0
Energy	6.21	0	0	6.23
Solid waste	0.23	0.01	0	0.57
Water supply and wastewater	0.74	0	0	0.79
Rebuilt Music Building Subtotal	**7.19**	**0.02**	**0**	**7.59**
Total Emissions (Rebuilt Music Building plus Project[a])				
Phase 1 and 2 Operational Emissions	261.31	0.45	0.01	275.05
Phase 3 Rebuilt Music Building	7.19	0.02	0	7.59
Amortized Construction Emissions				*69.51*
Operation + Amortized Construction Total				**344.56**

Notes: See Appendix A for detailed results.
These emissions reflect operational year 2023. No mitigation measures were assumed.

As shown in Table 3.7-3, estimated annual project-generated GHG emissions would be approximately 275 MT CO_2e per year, as a result of project operations only. Estimated annual project-generated operational emissions in 2023 (275.05 MT CO_2e per year) plus amortized project construction emissions (69.51 MT CO_2e per year) would be approximately 345 MT CO_2e per year, which would not exceed the recommended SCAQMD threshold of 3,000 MT CO2e per year. Therefore, in relation to the generation of GHGs, the project's impact would be **less than significant**. No mitigation is required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The City adopted the 15x15 Climate Action Plan in 2013, which is a short-term action plan which outlines 15 activities to reduce city-wide emissions by 15 percent below 1990 levels by 2015. The 15x15 Plan contains a wide range of initiatives to reduce emissions community wide from a verity of sources. The 15x15 Plan, however, is not a qualified GHG reduction under State CEQA Guidelines Section 15183.5(b).

The City is in the process of preparing a Climate Action Plan to increase the effectiveness and efficiency of GHG reduction efforts and ultimately become a carbon neutral city. At the time this analysis was prepared, the draft Climate Action Plan and the anticipated associated CEQA documentation has not been released for public review. Accordingly, at this time, there is currently no adopted local guidance that would be applicable to the project and no mandatory GHG plans, policies, or regulations or finalized agency guidelines would apply to implementation of the project.

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations. Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., LCFS), among others.

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2016 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2016 RTP/SCS is not directly applicable to the project because the underlying purpose of the 2016 RTP/SCS is to provide direction and guidance by making the best transportation and land use choices for future development. However, the development of the project site would not conflict with implementation of the strategies identified in the 2016 RTP/SCS that would reduce GHG emissions.

The proposed project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in Executive Order S-3-05 and Senate Bill 32. Executive Order S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Senate Bill 32 establishes for a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40 percent below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis; CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80 percent below 1990 levels, the First Update to the Climate Change Scoping Plan states that the level of reduction is achievable in California (CARB 2014). CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in Assembly Bill 32, Senate Bill 32, and Executive Order S-3-05. This is confirmed in the Second Update, which states (CARB 2017):

The 2017 Climate Change Scoping Plan Update builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The 2017 Climate Change Scoping Plan Update is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

The proposed project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed the SCAQMD's recommended threshold of 3,000 MT CO_2e per year (SCAQMD 2008). Because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

In addition, since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the project would be speculative and cannot be identified at this time. With respect to future GHG targets under SB 32 and EO S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the Assembly Bill 32 horizon year of 2020, to meet Senate Bill's 32's 40 percent reduction target by 2030 and Executive Order S-3-05's 80 percent reduction target by 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

Based on the above considerations, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be **less than significant**. No mitigation is required.

References

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3.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
i) Be located on a site that is, (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?	☐	☐	☐	☒
j) Be located within one-fourth mile of any facilities, which be reasonably anticipated to emit hazardous or acutely hazardous materials, substances or waste?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
k) Be located on a site where the property line is less than the following distances from the edge of the respective power line easements: (i) 100 feet of a 50-133kV line, or (ii) 150 feet of a 220-230 kV line, or (iii) 350 feet of a 500-550 kV line?	☐	☐	☐	☒
l) Be located on a site that is within 1,500 feet of a railroad track easement?	☐	☐	☐	☒
m) Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?	☐	☐	☒	☐
n) Be located within 1,500 feet of a pipeline that may pose a safety hazard?	☐	☐	☒	☐
o) Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	☐	☐	☐	☒
p) Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play field that can be safety supervised?	☐	☐	☒	☐
q) Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	☐	☐	☐	☒
r) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?	☐	☐	☒	☐
s) Create unsafe routes to schools for students walking local neighborhoods?	☐	☐	☒	☐
t) Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?	☐	☐	☐	☒

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be utilized during construction of the proposed project. These materials are not considered acutely hazardous and are used routinely throughout urban environments for both construction projects and small-scale structural improvements. Furthermore, these materials would be transported, used, disposed, and handled in accordance with all federal, state, and

local laws regulating the management and use of hazardous materials. Use of these materials for their intended purpose during construction would not pose a significant risk to the public or environment.

Hazardous materials that could be used once the proposed project is constructed would primarily consist of materials required for maintenance of the performing arts buildings and the landscape planters, such as chemical reagents, solvents, fuels, paints, cleansers, pesticides, fertilizers, and miscellaneous organics and inorganics. These materials would be similar to those currently used for operations at the project site and throughout the JAMS campus. The management, use, storage, and transportation of such hazardous materials is subject to local, state, and federal laws. Through compliance with these laws, implementation of the proposed project would not create a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials. Additionally, JAMS has a School Safety Plan that outlines procedures to address evacuation, clean up, and communication to protect students and staff in case of a hazardous material spill (Santa Monica-Malibu Unified School District 2018). Adherence to federal, state, and local regulations and implementation of the School Safety Plan in the event of a hazardous materials incident at the project site would minimize risks associated with the routine transport, use, and/or disposal of hazardous materials. For these reasons, impacts would be **less than significant**, and no mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. As described in Section 3.8(a), project construction activities may involve the use of hazardous materials. These materials may include gasoline, diesel fuel, lubricating oil, grease, solvents, and other chemicals used during construction. These materials are not considered acutely hazardous and are used routinely throughout urban environments for both construction projects and small-scale structural improvements. Use of hazardous materials during construction activities would be subject to compliance with applicable federal, state, and local statutes and regulations pertaining to hazardous materials. Compliance with these regulations would reduce the potential for hazardous materials to be released to the environment during construction. In addition, the District or its contractor would be required to implement a Storm Water Pollution Prevention Plan during construction activities, which would help prevent any contaminated runoff from leaving the project site.

The District commissioned a Phase I Environmental Site Assessment and an Environmental Hazards Survey to identify potentially hazardous environmental conditions at the project site. The Phase I Environmental Site Assessment was prepared by Converse Consultants and is included in this IS/MND as Appendix D1; the Environmental Hazards Survey was prepared by Leighton Consulting and is included in this MND as Appendix D2. (The purpose of the Environmental Hazards Survey is primarily to identify potentially hazardous pipelines, high voltage powerlines, and additional environmental hazards in

accordance with California Education Code Sections 17213.1 and 17210, and California Department of Education requirements per Title 5, California Code of Regulations Sections 14010 and 14011, as related to the proposed project. The purpose of the Phase I Environmental Site Assessment is primarily to identify the presence or likely presence of any hazardous substances or petroleum products in, at, or on a property due to any release to the environment. There is some overlap between the topics covered in each report. For example, both reports contain a regulatory database search of hazardous materials sites that have been recorded on the project site and in surrounding areas. However, references to both reports are included in this section, and both reports have been attached for reference.) As stated in Appendix D1, due to the age of the on-site structures that are proposed for demolition, hazardous building materials such as asbestos-containing material (ACM), lead based paint (LBP), and polychlorinated biphenyls (PCB) may be present within the structures. Additionally, there is the potential for LBP residues to be present in the shallow soils at the project site, based on the age of the on-site buildings (Appendix D1). Demolishing buildings containing hazardous building materials and/or grading within contaminated soils may lead to the release of hazardous substances. Exposure of workers or members of the public to these substances could result from direct contact with the substance during demolition and/or grading activities, incidental ingestion of the substance, and/or inhalation of airborne dust released from dried hazardous materials. Due to the potential presence of hazardous building materials and soil contamination at the project site and the potential for the project to result in the release of these materials to the environment, mitigation measures **MM-HAZ-1** and **MM-HAZ-2** would be implemented prior to and during construction to ensure that hazardous materials are properly identified, removed, and disposed in a manner that minimizes the potential for significant hazards to the public or to the environment to the extent feasible.

Hazardous materials that could be used once the proposed project is constructed would primarily consist of materials required for maintenance of the performing arts buildings and landscape planters, such as chemical reagents, solvents, fuels, paints, cleansers, pesticides, fertilizers, and miscellaneous organics and inorganics. These materials would be similar to those currently used for operations at the project site and throughout the JAMS campus. The use of such hazardous materials is subject to local, state, and federal laws. Compliance with these laws would minimize the potential for accident conditions to occur involving the release of such materials. Additionally, JAMS has a School Safety Plan that outlines procedures to address evacuation, clean up, and communication to protect students and staff in case of a hazardous material spill (Santa Monica-Malibu Unified School District 2018). Adherence to federal, state, and local regulations and implementation of the School Safety Plan in the event of a hazardous materials incident at the project site would minimize the potential for substantial effects to occur associated with the release of a hazardous material into the environment. Impacts would be **less than significant with mitigation incorporated** to address potential construction effects. No further mitigation is required.

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

Once hazardous building materials are removed, a follow-up inspection shall be performed of the existing buildings prior to demolition or renovation to confirm that the hazardous items have been removed to an acceptable level per DTSC requirements before commencing with demolition activities.

MM-HAZ-2 Prior to and/or during demolition and renovation activities, a Work Plan shall be implemented for the removal of lead-based paint (LBP) residues from the on-site soils. Affected soils would be excavated and disposed of off-campus, and the proposed project site would be cleaned to an acceptable level as per California Department of Toxic Substances Control (DTSC) requirements.

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

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact with Mitigation Incorporated. The project site is located within the existing JAMS campus. Additionally, Will Rogers Learning Community Elementary School is located

approximately 0.1 mile west of the project site, and Santa Monica College is located approximately 150 feet north of the project site (across Pearl Street).

As described under Sections 3.8(a) and 3.8(b), project construction activities may involve the use of hazardous materials. These materials may include fuels, oils, mechanical fluids, and other chemicals used during construction. These materials are not considered acutely hazardous and would be used in limited quantities. Further, the transportation, storage, use, and disposal of such hazardous materials during construction activities would be conducted in accordance with applicable federal, state, and local statutes and regulations. Demolition of the existing buildings at the project site and grading at the project site could result in the release of hazardous building materials and soil contaminants such as ACM, PCBs, and LBP, which may create a hazard for the public, with the potential to affect students, staff, and visitors at nearby schools. However, mitigation measures **MM-HAZ-1** and **MM-HAZ-2** have been set forth to ensure that such materials would be properly removed, handled, and disposed. Implementation of these measures would minimize the potential for the release of hazardous building materials and/or soil contaminants during construction of the proposed project. Furthermore, compliance with regulatory requirements and implementation of mitigation measures **MM-HAZ-1** and **MM-HAZ-2** would ensure that students, faculty, and visitors at the nearby schools are not exposed to hazardous material releases resulting from construction of the proposed project.

During operation of the project, hazardous materials that are used on-site would primarily consist of materials required for maintenance of the performing arts buildings, such as chemical reagents, solvents, fuels, paints, cleansers, pesticides, fertilizers, and miscellaneous organics and inorganics. These materials would be similar to those currently used for operations at the project site, throughout the JAMS campus, and throughout other typical school campuses. These materials are not considered acutely hazardous and would be used in limited quantities. The management, use, storage, and transportation of such hazardous materials is subject to local, state, and federal laws. Compliance with required regulations would minimize the potential for hazardous conditions to occur involving the release of such materials. As such, during operation of the project, any minor and limited use of hazardous materials on the project site would not be expected to adversely affect students, faculty, and visitors at schools. For these reasons, impacts would be **less than significant with mitigation incorporated** to address potential effects during construction. No further mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. A search of regulatory database listings of hazardous materials sites was conducted by EDR for the project site and for surrounding areas in May and June 2017. (These reports are included as part of Appendix D1 and Appendix D2.) The existing JAMS

campus is listed on a database (the California Environmental Protection Agency's Hazardous Waste Manifests Database (HAZNET)) for disposing materials containing PCBs; inorganic solid waste; household waste; and asbestos containing waste. However, there are no violations listed for the disposal of these materials, and the project site is not listed on any other regulatory databases. Furthermore, based on the off-site disposal of the wastes identified, these listings are not considered an environmental concern (Appendix D1). However, as identified in Section 3.8(b) and in Appendix D1, the existing buildings and soils at the project site may contain hazardous materials, such as ACM, PCBs, and LBP. Mitigation measures **MM-HAZ-1** and **MM-HAZ-2** have been set forth to ensure that such materials would be properly identified, removed, and disposed, thereby minimizing the potential for hazardous conditions involving the release of hazardous materials to result during construction of the project. The safe removal of any hazardous materials that may be present on the project site, as specified in mitigation measures **MM-HAZ-1** and **MM-HAZ-2**, would minimize the potential for the proposed project to create a significant hazard to the public or to the environment resulting from hazardous materials.

According to the radius search conducted by EDR, a number of businesses and institutions were identified within 0.5 mile of the project site that store, transport, and/or handle hazardous materials. Several of these sites have reported hazardous materials incidents, including leaking underground storage tanks and/or surface spills or leaks. Leaking underground storage tanks that have been reported within approximately 0.5 mile of the project site are listed below:

- Santa Monica College – 0.2 mile north of the project site
- Texaco – 0.26 mile northwest of the project site
- Tosco – 0.28 mile north of the project site
- Macdowell Trust Property – 0.29 mile northwest of the project site
- Fizpatrick's Service Center – 0.32 mile northwest of the project site
- Chevron Station – 0.47 mile northeast of the project site

The incidents at most of the properties listed above have been assigned "case closed" statuses, indicating that the leak, spill, cleanup, and/or investigation has been addressed (Appendix D1 and Appendix D2). (Case closure is given when corrective action at a site has been completed and any remaining hazardous materials from the release are considered to be low threat to human health, safety, and the environment.) The two sites that are still under regulatory review are Tosco and Chevron. However, as identified by Converse Consultants, the off-site locations identified in the database regulatory search do not pose a high level of environmental concern at the project site, due to the distance between the properties and the project site, the type of resource that is affected (soil), and the location of the properties with respect to the direction of regional groundwater. As such, regulatory database listings on off-site properties are not expected to pose a significant hazard at the project site.

Upon implementation of mitigation measures **MM-HAZ-1** and **MM-HAZ-2**, which would ensure safe removal of hazardous materials that may be present on the project site, impacts of the project pertaining to hazards associated with hazardous materials sites would be **less than significant with mitigation incorporated**. No further mitigation is required.

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

No Impact. The Santa Monica Airport is located at 3223 Donald Douglas Loop South, approximately 0.5 mile southeast of the project site. However, the project site is not located within the boundaries of the Airport Influence Area for this airport (Los Angeles County ALUC 2003). Further, the proposed project does not involve a land use change, and therefore, would not have the potential to introduce a new land use within the vicinity of the Santa Monica Airport that would lead to a safety hazard for people residing and working in the project area. (The proposed project involves replacing performing arts buildings within the existing JAMS campus.) The Santa Monica Municipal Airport is governed by the Santa Monica Airport Code and the Los Angeles Regional Planning Commission/Airport Land Use Commission's Airport Land Use Compatibility (ALUC) guidelines. This document provides for reasonable, safe, and efficient use of the airport as a public transportation facility and as a base for aviation and aviation-related operations. Normal airport operations that comply with applicable regulations would not pose a safety hazard to the surrounding areas, including the proposed project site. Furthermore, the proposed project would not introduce structures to the project site having the potential to interfere with aircraft, resulting in a safety hazard. Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace and requires that any project proponent who intends to perform any construction or alterations to structures that exceed 200 feet in height above ground level must notify the Federal Aviation Administration prior to construction. The proposed project would not involve high-rise structures in proximity to the airport that would require such notification. For these reasons, the proposed project would not result in safety hazards for people residing or working in the area, and **no impact** would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The project site is not located within the vicinity of a private airstrip, and therefore, would not result in a safety hazard for people residing or working in the project area. **No impact** would occur.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. JAMS has a School Safety Plan that addresses emergency response and appropriate actions, as well as evacuation plans (Santa Monica-Malibu Unified School District 2018). The proposed project would involve replacing existing performing arts buildings at the JAMS campus and would not introduce a new land use to the campus that does not currently exist. If necessary, the District would review and revise the existing School Safety Plan to reflect the new facilities at the project site and to revise any evacuation procedures or routes, if needed. However, in the event of an emergency, emergency response and evacuation plans would proceed on the campus with or without the proposed project. Further, the City of Santa Monica Fire Department would review the proposed project plans to ensure adequate emergency access. The plans would be adjusted in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. Additionally, the new auditorium building would be available for use as an emergency shelter, in the event of an emergency in the community. Currently, the building would be unavailable for such services due to structural safety concerns. As such, the replacement of this building would improve emergency response and evacuation processes at JAMS and in the vicinity of JAMS. For these reasons, **no impact** would occur related to implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death from wildland fires. The project site is located within a fully developed area and is not located adjacent to, or in the vicinity of, wildland areas. Although some landscaping exists on the project site, this landscaping is irrigated regularly and is not considered a fire hazard. As a result, **no impact** would occur.

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

No Impact. A search of sites listed on regulatory databases of hazardous materials sites on the project site and within the vicinity of the project site was conducted by EDR in 2017. (See Appendix D1 and Appendix D2.) No current or former hazardous waste disposal sites or solid waste disposal sites were identified on the project site. While JAMS has reported disposing a number of hazardous substances (PCBs, asbestos

containing waste, inorganic solid waste, and household waste), such disposals were conducted at a landfill (not at the project site itself), and no violations were reported. Furthermore, aside from the proper disposal of hazardous substances that has been conducted in the past, no releases of hazardous material have been reported for the project site (Appendix D1 and Appendix D2). Based on the survey of pipelines within 1,500 feet of the project site that was conducted by Leighton, there are no pipelines that carry hazardous substances on the project site (unless the pipeline is a natural gas line, which is used only to supply natural gas to that school or neighborhood). For these reasons, **no impact** would occur relative to the project being located on a waste disposal site, a hazardous substances release site, and/or a site with a pipeline transporting hazardous substances (unless the pipeline is a neighborhood gas line).

j) Would the project be located within one-fourth mile of any facilities, which would be reasonably anticipated to emit hazardous or acutely hazardous materials, substances or waste?

Less Than Significant Impact. A radius search of sites listed on regulatory databases of hazardous materials sites was conducted by EDR in 2017. (See Appendix D1 and Appendix D2.) A number of businesses and institutions were identified that store, transport, and/or handle hazardous materials within one-fourth mile from the project site. However, compliance with local, state, and federal laws governing the storage, handling, and transport of hazardous materials would minimize the potential for such materials to be emitted during storage, handling, and/or transport. As identified under Section 3.8(d), two nearby properties (Santa Monica College and Texaco) have been listed in a database for properties with leaking underground storage tanks. However, both of these leaks have a "case closed" status, indicating that leak has been addressed (Appendix D1 and Appendix D2). (Case closure is given when corrective action at a site has been completed and any remaining hazardous materials from the release are considered to be low threat to human health, safety, and the environment.) As such, the previous incidents at these sites are not likely to pose a concern at the project site. The existing JAMS campus is listed on a database (HAZNET) for disposing PCBs and materials containing PCBs; inorganic solid waste; household waste; and asbestos containing waste. However, there are no violations listed for the disposal of these materials (Appendix D1 and Appendix D2). The project site is generally surrounded by residential, church, and school uses. The properties within the vicinity of the project site that store, handle, and transport hazardous materials would be required to continue operating under federal, state, and local regulations governing the storage, handling, and transport of hazardous materials. In the event of a spill or a leak, procedures would be initiated in accordance with these laws that would ensure the spill or leak is addressed and that any necessary evacuations are conducted to ensure public safety. Compliance with federal, state, and local laws would ensure that impacts associated with hazardous materials, substances, and/or wastes within one-fourth mile of the project site would be **less than significant**. No mitigation is required.

k) Would the project be located on a site where the property line is less than the following distances from the edge of the following power line easements: (i) 100 feet of a 50-133kV line, or (ii) 150 feet of a 220-230 kV line, or (iii) 350 feet of a 500-550 kV line?

No Impact. There are no high-voltage power transmission lines in the project area at the specified distances and voltages (Appendix D1 and Appendix D2). Two Southern California Edison easements have been identified within the vicinity of the project; however, these easements are more than 350 feet southeast of the project area (Appendix D2). Therefore, the proposed project would result in **no impact** related to hazards associated with the presence of high power electrical lines within the project vicinity.

l) Would the project be located on a site that is within 1,500 feet of a railroad track easement?

No Impact. The nearest railroad track easement is the Exposition Right of Way located approximately 4,035 feet southeast of the site. No railroads have been identified within 1,500 feet of the project site (Appendix D1 and Appendix D2). As the project site is not located within 1,500 feet of a railroad track easement, **no impact** would occur.

m) Would the project be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?

Less Than Significant Impact. No reservoirs are located near the site, and no aboveground water storage tanks were identified near the site (Appendix D2). However, several high-pressure water lines are located near the project site. See Section 3.8(n) for a discussion of these water lines. As substantiated in Section 3.8(n), impacts were determined to be **less than significant**. No mitigation is required.

n) Would the project be located within 1,500 feet of a pipeline that may pose a safety hazard?

Less Than Significant Impact. As described in Appendix D2, there are no high pressure natural gas pipelines located within 1,500 feet of the project site; there are no hazardous liquid or liquid petroleum pipelines located within 1,500 feet of the project site; there are no high-pressure sewer pipelines located within 1,500 feet of the project site; and, it is not anticipated that fuel pipelines are located within 1,500 feet of the project site. However, eight high-volume water lines were identified to be located within 1,500 feet of the project site.

A previous study that evaluated potential risks from water lines near the JAMS campus determined that the two closest pipelines may pose a safety risk to people at the project site (LFR 2009, as cited in Appendix D2). These pipelines are located along Pearl Street and 16th Street. The Pearl Street pipeline is approximately 25 feet north of the project site, and the 16th Street pipeline is approximately 40 feet west of the project site. Both lines are located on the opposite side of the streets from the school property. Leighton's review of

elevation data, direction of gravity flow in the storm drain system, and field observations indicate that the local gradient along both Pearl Street and 16th Street directs water to curb lines then into storm drains away from the JAMS site. Therefore, the local drainage on Pearl Street and 16th Street is generally away from the JAMS site. Roadway curbs and storm drains will serve to limit the spread of a pool from a ruptured water pipe under the roadway. The local gradient directing water away from the JAMS site on Pearl Street and 16th Street helps to reduce the site inundation hazards and minimize concerns for this project. Further, the proposed project is not expected to create a new safety hazard or to exacerbate an existing safety hazard to students from high volume water lines. The proposed project would involve replacement of existing performing arts buildings at the JAMS campus and would not increase enrollment or faculty at the school. For these reasons, impacts would be **less than significant**. No mitigation is required.

o) Would the project be located on a site that contains, or is near, propane tanks that can pose a safety hazard?

No Impact. Based on a field reconnaissance conducted by Leighton, no propane tanks that would pose a safety hazard to the project site were identified at the project site. One aboveground propane tank was identified within the vicinity of the project site (at a gas station on the south corner of the intersection of Pico Boulevard and 20th Street). However, due to the distance between this gas station and the project site (over 1,500 feet), the propane tank is not expected to result in significant safety hazards at the project site. As such, **no impact** would occur.

p) Would the project be located on a site that does not have a proportionate length to width ratio to accommodate a building layout, parking, and playfield that can be safety supervised?

Less Than Significant Impact. The California Department of Education standards for school site selection require that school sites have a proportionate length-to-width ratio to accommodate the building layout, parking, and playfields to ensure that students can be safely supervised. Under the proposed project, no change would be made to the footprint of the existing school site or to the school's parking areas. However, minor changes to the building layout and to an existing grass lawn would occur on the project site. The proposed project would involve replacement of performing arts buildings within a portion of the JAMS campus that is currently occupied with a music building, an auditorium, and a lawn area. The new buildings would be located in approximately the same place as the existing buildings, with the exception of the rehearsal building and associated terrace, which would be constructed in an area of the project site that is currently part of a grass lawn occupying the northwest corner of the project site. The new rehearsal building and terrace are not expected to interfere with supervision on the remaining portion of the lawn. In fact, the proposed rehearsal building and terrace would eliminate a portion of the lawn that is currently surrounded by structures and a large tree and would also reduce the overall size of the lawn. These changes may make the lawn area more manageable to supervise by eliminating a portion of the lawn that may be less visible under the current configuration.

Two new outdoor areas would be constructed as part of the project: the terrace and the music courtyard. As shown in Figure 2-1, the proposed terrace would have an opening to the lawn near the existing magnolia tree. As such, visibility from the lawn to the terrace (and vice versa) would be afforded. The music courtyard would be more secluded from the other areas of the campus; however, the new music building would open out onto the courtyard, allowing for supervision and visibility in this area. For these reasons, the proposed project would not result in changes to the campus that would adversely compromise safe supervision. Additionally, all improvements would be designed in accordance with California Department of Education guidelines, ensuring that state safety standards for schools are met. Impacts would, therefore, be **less than significant**, and no mitigation is required.

q) Would the project be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?

No Impact. The project site is not located within 2,000 feet of a site that operates as a significant disposal site of hazardous wastes. According to research conducted by Leighton, a search of regulatory databases did not identify records indicating that the JAMS campus was formerly used as a hazardous waste disposal site or as a solid waste disposal site (Appendix D2). The nearest landfill is located approximately 16 miles northwest of the proposed project site (the Calabasas Landfill). **No impact** from significant disposal of hazardous wastes would occur, since these activities do not occur at the project site or within the vicinity of the project site.

r) Would the project substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less Than Significant Impact. The proposed project would involve replacement of the existing performing arts building at the existing JAMS campus. As such, the proposed project would not change the land use of the site such that an incompatible use is introduced to the area. The internal pedestrian circulation of the project site may change under the proposed project as a result of the proposed new structures and construction of a terrace and courtyard. However, any new pedestrian pathways and internal circulation would be designed in accordance with California Department of Education guidelines and are not expected to introduce a safety hazard to the campus. Furthermore, the sidewalks and surrounding roadways would not be modified by the project, and the proposed project would not involve an increase in student enrollment or faculty. As such, the volumes and patterns of daily pedestrian and vehicular traffic are not expected to substantially change as a result of the proposed project.

As described in Section 2.3 of this MND, the number of events held at the auditorium are expected to increase upon completion of the new auditorium that is proposed as part of this project. Events would result in periodic increases in pedestrian and vehicular traffic in the project area. However, the project site is located

in an urbanized area that is characterized by a high level of pedestrian and vehicular activity, due in part to the presence of the JAMS campus, the adjacent Santa Monica College and Will Rogers Learning Community Elementary School campuses, several churches, businesses, and residential neighborhoods. Periodic events at the JAMS campus would not result in a substantial change in activity in the area relative to existing conditions. Furthermore, many events (especially those not associated with JAMS programs) would take place outside of school hours and would, therefore, not contribute any traffic or additional activity that would overlap with school-related traffic at JAMS. Additionally, existing pedestrian and vehicular traffic control and safety measures are present throughout the project area. For example, the intersection of 16th Street and Pearl Street is controlled by an all-way stop, and pedestrian crossings at this intersection are striped. Additional measures such as traffic cones and crossing guards are used at this intersection when necessary. During any events that may affect student access, the District already develops and implements a plan to ensure proper notification and safety. Previous plans for such events have included notification of parents/students/staff, appropriate signage, restrictive barriers, and employment of campus security officers. Furthermore, sidewalks are present along all three of the project site's street frontages and are separated from the vehicular travel lane by parking stalls or landscape planters. The existing design features of the project area and the District's practice of implementing safety plans during special events would continue to minimize hazards associated with pedestrians and vehicles traveling to, from, and around the project site. Additionally, for convenience, the District may consider creating a drop-off area for the performing arts complex, which would further ensure the safety of pedestrians accessing the performing arts buildings and those accessing other portions of the campus. For these reasons, impacts associated with vehicular and/or pedestrian safety hazards would be **less than significant**. No mitigation is required.

s) Would the project create unsafe routes to schools for students walking local neighborhoods?

Less Than Significant Impact. The proposed project would not alter enrollment at the school. As such, no change in the number of students who walk to school would result from the proposed project. During construction, construction activities may temporarily preclude pedestrians from walking through the project site or along the site's boundaries. However, the project site does not include the main entrance to the school. Any students who may enter or pass by the project site on their way to school would be able to use a variety of other access routes and entrances, such as the main JAMS campus entrance along 16th Street, which would not be affected by the proposed project. In the event that temporary sidewalk closures are required during construction, such closures would be marked with appropriate detour signage, and students would be safely routed around the closure. The proposed project would not involve permanent changes to off-site pedestrian circulation. As described under Section 3.8(r), existing sidewalks along the project site's street frontages would remain in place under the proposed project. Any interruptions in the use of these sidewalks would occur during construction and would, therefore, be temporary.

As stated in Section 3.8(r), the proposed project would be associated with increases in events at the new auditorium. These events would result in increased pedestrian and vehicular activity in the project area, which could potentially affect students walking to school. However, many events (especially those not associated with JAMS programs) would take place outside of school hours and would, therefore, not contribute to any traffic or additional activity that would overlap with school-related traffic at JAMS. If events are held during the times that students walk to and from school, the existing pedestrian infrastructure, such as sidewalks and striped crosswalks, would minimize potential safety hazards associated with increased activity in the area. Additional cones and crossing guards would be implemented as necessary. Also, as described under Section 3.8(r), the District already implements a plan to address student access if an event is planned that may affect access. Provisions of these plans include notification of students/parents/staff, appropriate signage, restrictive barriers, and employment of campus security officers. Additionally, for convenience, the District may consider creating a drop-off area for the performing arts complex, which would further ensure the safety of pedestrians accessing the performing arts buildings and those accessing other portions of the campus. For the reasons described above, any effects on pedestrian routes to the JAMS campus would be temporary and periodic; would be addressed through safety measures such as signage, cones, additional crossing guards, proper notification, and security guards; and would also be minimized through the existing pedestrian infrastructure in the project area. Impacts to pedestrian routes to school would therefore be **less than significant**. No mitigation is required.

t) Would the project be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?

No Impact. The project site is not located adjacent to or near a major freeway. The closest freeway, I-10, is located approximately 0.6 miles northwest of the project site. PCH is approximately 0.6 mile southwest of the project site. The project site is within the existing JAMS campus and is bordered by Pearl Street to the north and 17th Street to the east. To the west of the project site, separated from the site by a lawn, is 16th Street. None of these surrounding streets are designated as a major arterial roadway. Furthermore, based on a site reconnaissance and a review of topographic and aerial maps, Leighton did not identify any major roads near the project site (Appendix D2). Therefore, the proposed project would result in **no impact** due to location near a major arterial roadway or freeway.

References

Los Angeles County ALUC (Airport Land Use Commission). 2003. "Santa Monica Airport – Airport Influence Area." May 13, 2003. Accessed January 10, 2018. http://planning.lacounty.gov/aluc/airports#anc-apm.

Santa Monica-Malibu Unified School District. 2018. *Comprehensive School Safety Plan SB 187 Compliance Document 2017-18 School Year*. February 23, 2018. Accessed March 6, 2018. http://www.smmusd.org/aboutus/SchoolSafetyPlan.pdf.

3.9 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. A significant impact would occur if the proposed project would discharge water that does not meet existing water quality standards. Such standards include those of the National Pollution Discharge Elimination System (NPDES) Permit program, the State Water Resources Control Board (SWRCB), and the Los Angeles Regional Water Quality Control Board (RWQCB). The project is not anticipated to violate any water quality standards or waste discharge requirements during construction or operation, for the reasons described below.

Stormwater Runoff During Construction

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

Potential water quality impacts associated with construction would be temporary and highly localized. However, because land disturbances associated with the project would be greater than one acre in size, the District and/or its contractor would be required to submit a Notice of Intent to the State Water Resources Control Board (SWRCB) in order to obtain approval to carry out construction activities under the Construction General Permit. This permit includes a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction-phase impacts related to stormwater (and some non-stormwater) discharges. Compliance with the Construction General Permit requires that a SWPPP be developed and implemented by qualified individuals, as defined by the SWRCB. The SWPPP includes best management

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

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

Operation

The proposed project site is located within the existing JAMS campus, which produces nonpoint source pollutants associated with stormwater runoff. The proposed project would not introduce any industrial discharges and would not, therefore, violate any water quality standards or waste discharge requirements related to non-stormwater discharges. Any stormwater currently discharged from the project site is similar in nature to discharges from surrounding residential, institutional, and commercial uses. Implementation of the proposed project would not change the land use of the project site (the site would remain in use for performing arts purposes). As such, future water discharge from the project site would be similar to existing conditions in volume and quality. The main difference between pre-project conditions and post-project conditions at the project site would be the development of a small lawn area in the northwest corner of the site. (Under the proposed project, this lawn area would be developed with the proposed rehearsal building and terrace.) As such, the project would involve removal of an existing pervious area on the project site that currently allows for stormwater infiltration. However, the hardscape within the terrace would be constructed using permeable concrete pavers, which would allow for some continued infiltration of stormwater, which would reduce runoff from the hardscaped areas during project operation. However, under existing conditions, the site is primarily covered with impervious materials and would continue to be primarily impervious after project implementation. As such, changes to the amount of pervious and impervious materials at the site would be limited, and the volume of runoff leaving the project site is expected to be

similar in quantity to existing conditions. The District would be required to obtain permits for connections to the storm drain system and the sanitary sewer and would adhere to effluent limitations contained therein. No separate NPDES permit or waste discharge requirements would be necessary for project operation. As the proposed project would not increase the volume or decrease the quality of stormwater runoff flowing from the site into the City's storm drain system, the proposed project would result in a **less than significant impact**. No mitigation is required.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. The proposed project would not deplete or substantially interfere with the local groundwater table because no groundwater wells are proposed and because the proposed project would not substantially interfere with groundwater recharge. As described in Section 3.6(a), the historic high groundwater level at the site is greater than 40 feet below ground surface. Any subterranean excavations required for proposed project construction would extend to a maximum depth of 25 feet below the ground surface. As such, groundwater would not be encountered during construction, and dewatering would not be required. Under existing conditions, the project site is primarily impervious and, therefore, does not provide for substantial groundwater recharge. Upon implementation of the proposed project, the site would remain primarily impervious. As part of the proposed project, a lawn area in the northwest corner of the project site would be developed with a rehearsal building and a terrace, resulting in the removal of an existing pervious area. However, the hardscape within the terrace would be constructed using permeable concrete pavers, which would allow for some continued infiltration of stormwater in the area of the site that is currently occupied by the lawn. For these reasons, the proposed project would not substantially interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table.

During operation, the proposed project is not anticipated to result in a substantial increase in water use at the project site to the extent that groundwater supplies would become substantially depleted. The proposed project would not increase enrollment or faculty at the campus, and the proposed project would not result in a substantial change in the amount of landscaped area on the project site requiring water. Therefore, daily operational water use at the campus would not be substantially altered by the proposed project. However, as described in Section 2.3 of this MND, the proposed project would result in an increase in events held at the JAMS auditorium. The auditorium has not been in operation since 2014. Upon completion of the new auditorium, it would reopen for use by JAMS and a variety of community groups. Further, the frequency of events would increase relative to pre-2014 conditions. This increase in activity associated with additional events may result in increased water use at the project site relative to existing conditions. However, the increased water

use would be generally limited to restroom operation at the auditorium. In the context of the total water use of the JAMS campus and of the City as a whole, restroom use associated with the periodic, temporary events that would be held at the auditorium would not substantially alter water use to the extent that groundwater supplies would become substantially depleted. For these reasons, impacts of the project relative to groundwater use and groundwater recharge would be **less than significant**, and no mitigation is required.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The project site is located in an urban, developed area and is not located on or near streams, rivers, lakes, or major drainage channels. Therefore, implementation of the project would not alter the course of a stream or river. Existing stormwater runoff from the project site and surrounding area is removed by way of street flows and storm drains. Therefore, implementation of the project would not alter the course of a natural waterway nor cause substantial erosion or siltation on- or off site. The proposed project would result in ground disturbance on a site that is already fully developed with existing structures, hardscape, and landscape. As discussed under Section 3.9(a), all construction activities would be required to comply with a SWPPP that would dictate BMPs for erosion and sediment controls. Implementation of these BMPs for erosion and sediment control would minimize erosion and siltation on and off site during construction to the extent practicable. No ground disturbance would occur during operation of the proposed project, and the site would be fully developed with buildings, hardscape, and landscaping planters during operation, which would preclude substantial erosion and siltation on the site. Further, as described in Section 3.9(a), the amount of stormwater runoff from the project site is not anticipated to increase upon project implementation. As such, during operational conditions, the proposed project would not have the potential to result in substantial erosion or siltation on or off the project site. For these reasons and upon compliance with the BMPs set forth for construction activities in the project's SWPPP, impacts related to erosion and siltation resulting from the proposed project would be **less than significant**. No mitigation is required.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. The project site is located in an urban, developed area and is not located on or near streams, rivers, lakes, or major drainage channels. Therefore, implementation of the project would not alter the course of a stream or river. As discussed under Section 3.9(a), all construction activities would be required to comply with a SWPPP that would dictate BMPs for the management of water runoff. Implementation of these BMPs would minimize the potential for construction activities to result in flooding on or off the project site. No ground disturbance would occur during operation of the proposed project, and the site would be fully developed with buildings, hardscape, and landscaping planters during operation. As

described in Section 3.9(a), the amount of stormwater runoff from the project site is not anticipated to increase upon project implementation. As such, during operational conditions, the proposed project would not increase the potential for flooding on or off the project site. For these reasons, impacts would be **less than significant**, and no mitigated is required.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. During construction of the proposed project, drainage patterns and runoff quantities on the project site may be temporarily altered due to grading at the project site. Compliance with a project-specific SWPPP, and specifically the use of runoff-control devices, would ensure that runoff quantities are controlled to the extent practicable, to avoid overwhelming the existing stormwater drainage system. Furthermore, the SWPPP would contain project-specific BMPs that would help prevent construction-related pollutants, such as sediments and fuels for equipment, from entering stormwater runoff. Upon compliance with the measures outlined in the SWPPP, construction activities at the project site would not provide a substantial source of polluted runoff nor would they substantially increase runoff volumes leading to exceedances in the storm drain capacity.

During operation, stormwater runoff volumes and stormwater runoff quality would not differ substantially from existing conditions, as explained in Section 3.9(a). The amount of impervious and pervious materials on the site would not substantially change under the proposed project. While a small section of existing lawn would be converted to a rehearsal building and a terrace, the terrace would be constructed with permeable pavers and would have landscaping planters. As such, the loss of this lawn area would not substantially alter runoff volumes from the site. Furthermore, the site uses would remain the same as existing conditions (i.e., performing arts buildings at a middle school); as such, operations would not introduce a substantial new source of polluted runoff. For these reasons, operational activities at the project site would not provide a substantial new source of polluted runoff nor would they substantially increase runoff volumes leading to exceedances in the storm drain capacity. For these reasons, impacts would be **less than significant**. No mitigation is required.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. No other potential impacts on water quality would occur outside of those discussed under Sections 3.9(a) through 3.9(e), above. Therefore, impacts to water quality would be **less than significant**. No mitigation is required.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. No area of the City is mapped within a 100-year flood hazard zone (DWR 2018). Furthermore, housing would not be constructed as part of the project. Accordingly, **no impact** would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. The project site is not located within a 100-year flood hazard area (DWR 2018). As such, the proposed project would not place structures within a 100-year flood hazard area, and **no impact** would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. Flooding can result from the failure of dams or levees, or other water-retaining structures from earthquakes. The project site is located in a developed urban area, and there are no levees or dams in the immediate area. As described under Section 3.9(g), the project site is not located within a 100-year flood hazard zone and, therefore, is not expected to be subject to flooding hazards. Therefore, **no impact** related to the exposure of people or structures to flooding, including flooding as a result of the failure of a levee or dam, would occur.

j) Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. The project site is located approximately 1.25 miles inland from the Pacific Ocean, at an elevation of approximately 140 feet above sea level. While some low-lying areas of the City may be susceptible to tsunami inundation, the project site is not located within a potential tsunami inundation area as mapped by the City of Santa Monica (City of Santa Monica 2018). Damage to the project site due to a seiche (a seismic-induced wave generated in a restricted body of water) is considered unlikely because no restricted bodies of water are in close proximity to the JAMS campus. Additionally, the project site is located in a developed urban area that is not prone to flooding, and mudflows would not be expected at the project site, due to the developed nature of the area and the level terrain. The impact from tsunami, seiche, or mudflow would be **less than significant**. No mitigation is required.

References

City of Santa Monica. 2018. Web Mapping Application. Environmental Layers – Tsunami Zone. Accessed January 26, 2018. http://csmgisweb.smgov.net/Html5Viewer/Index.html?configBase=http://csmgisweb.smgov.net/Geocortex/Essentials/REST/sites/laco_test/viewers/LACO_base_test_html5/virtualdirectory/Resources/Config/Default.

DWR (Department of Water Resources). 2018. *Best Available Maps*. Accessed January 26, 2018. http://gis.bam.water.ca.gov/bam/.

3.10 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a) Would the project physically divide an established community?

No Impact. The proposed project would involve replacement of existing performing arts buildings within the JAMS campus. The proposed project would not involve features such as a highway, aboveground infrastructure, an easement through an established neighborhood, or permanent street or sidewalk closures, which would have the potential to physically divide an established community. For these reasons, the proposed project would not physically divide an established community, and **no impact** would result.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The project site is located within the City of Santa Monica. While the design of the project is not subject to the City's land use plans and policies, a general discussion of the City's land use designation for the project site and the project's consistency with the City's designation is provided here for informational purposes.

The site is zoned for Institutional/Public Lands (PL) and is designated for Institutional/Public Lands uses in the City's General Plan. Schools are allowable within the Institutional/Public Lands designation, as

established in Section 9.15.010 of the City's Municipal Code. After project implementation, the project site would remain part of the JAMS campus. As such, the proposed project would be consistent with the City's land use designation for the project site. The proposed replacement auditorium would exceed the height limit for the PL zone of 32 feet, which is established in Section 9.15.030 of the City's Municipal Code. (As described in Section 2.1 of this MND, the proposed auditorium would be a maximum of 54.5 feet in height.) However, the District is not required to design its facilities in accordance with the City's Zoning Ordinance. Furthermore, as explained and substantiated in this MND, the height of the proposed auditorium building would not create any significant impacts on the environment. Although the height is inconsistent with the City's Zoning Ordinance, the proposed height of this building nonetheless would not create significant aesthetic impacts (see Section 3.1) or air traffic impacts (see Section 3.8(e)). Impacts related to land use plans and policies adopted for the purpose of avoiding or mitigating environmental effects would, therefore, be **less than significant**. No mitigation is required.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The City is not within any of the regional conservation plans designated by the state (CDFW 2017). The project site is located in an urban area. As described under Section 3.4(a), no suitable habitat for any special-status plant or wildlife species occurs on the project site and no special status/sensitive species are expected to occur on the project site. As such, there are no Habitat Conservation Plans, Natural Community Conservation Plan, or other approved habitat conservation plan that apply to the project site. Therefore, implementation of the proposed project would not conflict with the provisions of such plans, as none apply to the project site. **No impacts** would occur as a result of implementing the proposed project.

References

CDFW (California Department of Fish and Wildlife). 2017. *California Regional Conservation Plans* [map]. October 2017. Accessed January 9, 2018. https://www.wildlife.ca.gov/Conservation/Planning/NCCP.

3.11 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the project site within Mineral Resource Zone 3 for aggregate resources. Mineral Resource Zone 3 is a designation given to areas containing mineral deposits the significance of which cannot be evaluated from available data (Division of Mines and Geology 1979). Currently, the project site is entirely developed and occupied by existing JAMS campus uses. No mining operations are present on-site or within the project area. The project area is developed with schools, residences, and churches. As such, mining operations would be generally incompatible with the existing land use patterns of the project area. The only mining activity that has occurred in Santa Monica has been the removal of sand from the beaches for construction and other purposes, but that activity has been discontinued and is no longer allowed (City of Santa Monica 1975). There is currently no mineral production within Santa Monica, and it is unlikely that any future production will occur, due to the intensity of urban development (City of Santa Monica 1975). For these reasons, the proposed project would not result in the loss of availability of a known mineral resource, and the project would have **no impact** on known mineral resources.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As indicated above in Section 3.11(a), there is currently no mineral production within Santa Monica, and it is unlikely that any future production will occur (City of Santa Monica 1975). Therefore, implementation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. **No impact** associated with a locally important mineral resource would occur.

References

City of Santa Monica. 1975. *City of Santa Monica General Plan, Conservation Element*. Adopted September 10, 1975. Accessed January 23, 2018. https://www.smgov.net/Departments/PCD/Plans/General-Plan/Conservation-Element/.

Division of Mines and Geology. 1979. *Mineral Land Classification Map – Aggregate Resources Only – Beverly Hills Quadrangle.* [map]. May 25, 1979. Accessed January 23, 2018. http://www.quake.ca.gov/gmaps/WH/smaramaps.htm.

3.12 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Existing Noise Conditions

The proposed project site is located at 2425 16th Street in Santa Monica, California, on the site of the existing John Adams Middle School. Land uses in the immediate vicinity of the Project site consist of Santa Monica College to the northwest, residential to the northeast and southwest, and commercial to the southeast.

The I-10 Freeway is located approximately 0.6 miles northwest of the project site, and the Santa Monica Municipal Airport is located approximately 0.5 mile to the southeast. The project site and surrounding area experience noise

associated with the surrounding land uses; noise from traffic on the local arterial roadways, as well as noise from the distant freeway, occasional noise from distant aircraft, and ambient community noise.

Noise measurements were conducted on the project site and at noise-sensitive land uses adjacent to the project site in December 2017 to characterize the existing noise environment. The daytime, short-term (1 hour or less) attended sound level measurements were taken with a Piccolo digital integrating sound-level meter. This sound-level meter meets the current American National Standards Institute (ANSI) standard for a Type 2 (General Purpose) sound-level meter. The calibration of the sound level meter was verified before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four noise measurement locations (ST1–ST4) were selected. Measurement locations ST1 and ST2 represent existing on-site noise conditions, while ST3 and ST4 represent the adjacent noise-sensitive land uses. The measurement locations are shown in Figure 3.12-1 (Noise Measurement and Modeling Locations), and the measured average noise levels and measurement locations are provided in Table 3.12-1 (Measured Noise Levels). Noise measurement data is also included in Appendix E. The primary noise sources at the locations consisted of traffic along the adjacent roads, distant traffic, birds, neighborhood community noise (e.g., distant landscaping activity noise), and passing school children. As shown in Table 3.12-1, the measured noise levels ranged from 52 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}) at ST1 to 67 dBA L_{eq} at ST4.

Table 3.12-1. Measured Noise Levels

Receptors	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	In open square in middle of JAMS Campus.	December 19, 2017	11:28 a.m. – 11:43 a.m.	52.4	66.5
ST2	On-campus, northeast side	December 19, 2017	11:49 a.m. – 12:04 p.m.	61.3	72.5
ST3	Latter Day Saints Institute, 1702 Pearl Street	December 19, 2017	12:19 p.m. – 12:34 p.m.	64.4	81.6
ST4	Residence, 1701 17th Street.	December 19, 2017	12:43 p.m. – 12:58 p.m.	66.8	88.2

Source: Appendix E.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval

Applicable Noise Standards

State of California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for the purpose of controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential

buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL (community noise equivalent level) or higher. Acoustical studies that accompany building plans for noise sensitive land uses must demonstrate that the structure has been designed to limit

interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

California Department of Transportation Vibration Standards

The California Department of Transportation (Caltrans) Division of Environmental Analysis created the Transportation and Construction Vibration Guidance Manual, which provides guidance to Caltrans engineers, planners, and consultants in assessing vibration from construction, operation, and maintenance of Caltrans projects. The manual also provides general information on the potential effects and levels of vibration on people and vibration-sensitive land uses. For the purposes of providing a recognized threshold for annoyance from vibration, the vibration impacts analysis for the proposed project references the Caltrans threshold of approximately 0.10 inches/second peak particle velocity (PPV) as the level at which continuous vibration begins to cause annoyance (Caltrans 2013).

City of Santa Monica General Plan

The City of Santa Monica's General Plan Noise Element (Santa Monica 1992) contains goals, policies and actions to address noise within the City. The City has established acceptable exterior and interior noise level standards for assessing land use compatibility of proposed land uses with the noise environment, which are set forth in the City's General Plan Noise Element. The following tables are the primary tools that allow the City to ensure integrated planning for compatibility between land uses and outdoor noise. Table 3.12-2 (Land Use/Noise Compatibility Matrix) (which is Table 1 in the Santa Monica General Plan Noise Element) shows design standards to be used in the project design stage.

Table 3.12-2. Land Use/Noise Compatibility Matrix

Land Use Categories		Compatible Land Use Zones (noise levels expressed in units of CNEL)						
Categories	*Uses*	*<55*	*55-60*	*60-65*	*65-70*	*70-75*	*75-80*	*>80*
Residential	Single Family, Duplex, Multiple Family	A	A	B	B	C	D	D
Residential	Mobile Home	A	A	B	C	C	D	D
Commercial Regional, District	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D
Commercial Regional, Village	Commercial Retail, Bank, Restaurant, Movie Theater	A	A	A	A	B	B	C
Commercial, Industrial Institutional	Office Building, Research and Development, Professional Offices, City Office Building	A	A	A	B	B	C	D

Table 3.12-2. Land Use/Noise Compatibility Matrix

Land Use Categories		Compatible Land Use Zones (noise levels expressed in units of CNEL)						
Categories	*Uses*	*<55*	*55-60*	*60-65*	*65-70*	*70-75*	*75-80*	*>80*
Commercial, Recreation, Institutional, Civic Center	Amphitheatre, Concert Hall, Auditorium, Meeting Hall	B	B	C	C	D	D	D
Commercial, Recreation	Children's Amusement Park, Miniature Golf Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	B	B	D	D
Commercial, General, Special, Industrial, Institutional	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Institutional, General	Hospital, Church, Library, Schools' Classroom, Day Care	A	A	B	C	C	D	D
Open Space	Parks	A	A	A	B	C	D	D
Open Space	Golf Course, Cemeteries, Nature Centers/Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
Agriculture	Agriculture	A	A	A	A	A	A	A

Source: City of Santa Monica 1992

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

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

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

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

City of Santa Monica Municipal Code Noise Ordinance

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

4.12.025 General regulation.

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

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

(1) The volume of the noise;

(2) The intensity and duration of the noise;

(3) Whether the noise is constant, recurrent or intermittent;

(4) The nature and zoning of the area within which the noise emanates;

(5) The proximity of the noise to noise-sensitive land uses, such as hospitals, schools, recovery facilities, or any facility that regularly accommodates a person or persons who may be sleeping;

(6) The volume and intensity of the background noise;

(7) The density of the land uses of the area within which the noise emanates; and

(8) The time of day or night the noise occurs.

4.12.030 Exemptions.

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

- Activities conducted on public or private school grounds including, but not limited to, school athletic and school entertainment events;
- Community events;
- Activities conducted on public property that is generally open to the public, including, but not limited to, streets, sidewalks, alleys, parkways, parks, and beaches.

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

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

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

(3) Any activity regulated by Santa Monica Municipal Code Section 10.04.04.010 et seq. (Aircraft Noise Abatement Code);

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

(5) Any non-commercial activity conducted outdoors:

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

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

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

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

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

Section 4.12.060 - Exterior Noise Standards

(a) The following noise standards shown in Table 3.12-3 (City of Santa Monica Operational (On-Site) Noise Standards)), unless otherwise specifically indicated, shall apply to all property with a designated noise zone during the times indicated:

Table 3.12-3. City of Santa Monica Operational (On-Site) Noise Standards

Noise Zone	Time Interval	Allowable L_{eq}	
		15-Minute Continuous Measurement Period	*5-Minute Continuous Measurement Period*
Zone I (Residential)	*Monday—Friday*		
	10 p.m. to 7 a.m.:	50 dBA	55 dBA
	7 a.m. to 10 p.m.:	60 dBA	65 dBA
	Saturday and Sunday		
	10 p.m. to 8 a.m.:	50 dBA	55 dBA
	8 a.m. to 10 p.m.:	60 dBA	65 dBA
Zone II (Commercial)	*All Days of Week*		
	10 p.m. to 7 a.m.:	60 dBA	65 dBA
	7 a.m. to 10 p.m.:	65 dBA	70 dBA
Zone III (Manufacturing and Industrial)	*All Days of Week*		
	Anytime	70 dBA	75 dBA

Source: City of Santa Monica, 2004.

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

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

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

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

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

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

Section 4.12.070 - Vibration

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

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

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

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

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

(3) All day on Sunday;

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

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

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

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

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

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

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

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

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

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

Section 4.12.120 - Posting of Construction Signs

(a) There shall be displayed at every site covered by this Chapter where work activities requiring a City permit are being conducted, a sign in English and Spanish reading substantially as follows:

> "Attention All Employees and Subcontractors. Santa Monica construction/demolition work times are: Monday through Friday, 8:00 a.m. until 6:00 p.m.; Saturday 9:00 a.m. until 5:00 p.m.; Sundays and holidays, no work permitted." In addition, the sign shall indicate the City

telephone numbers where violations of this Section can be reported, the location of the job site, and the permit number issued authorizing the work.

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

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

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

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

Section 4.12.130 - Location, Screening and Noise Measurements of Mechanical Equipment

All development project applications must demonstrate compliance with or contain the following information:

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

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

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

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction

Less Than Significant Impact. Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the

operations being performed, and the distance between the source and receptor. Construction of the proposed project is anticipated to commence in 2018 and be completed in 2022. Construction would involve demolition of the existing auditorium, remodeling of the music building, construction of the new auditorium, construction of the new rehearsal building, and construction of the new music building. The District will adhere to City of Santa Monica guidelines regarding allowable construction hours and workdays, unless alternate requirements are given under a waiver.

Equipment that would be in operation during construction would include rubber-tired dozers, graders, scrapers, tractors/loaders/backhoes, cranes, industrial saws, and air compressors; construction equipment with substantially higher noise-generation characteristics (such as pile drivers, rock drills, blasting equipment) would not be necessary for construction of this project.

Construction noise is difficult to quantify precisely because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the project site. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 3.12-4 (Construction Equipment Maximum Noise Levels). Note that the equipment noise levels presented in Table 3.12-4 are maximum noise levels. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 3.12-4. Construction Equipment Maximum Noise Levels

Equipment	Sound Level (dBA) 50 Feet from Source
Air compressor	81
Backhoe	80
Compactor	82
Concrete mixer	85
Concrete pump	82
Concrete vibrator	76
Crane, mobile	83
Dozer	85
Generator	81
Grader	85
Impact wrench	85
Jackhammer	88
Loader	85
Paver	89

Table 3.12-4. Construction Equipment Maximum Noise Levels

Equipment	Sound Level (dBA) 50 Feet from Source
Pneumatic tool	85
Pump	76
Roller	74
Saw	76
Truck	88

Source: FTA 2006.

The maximum noise levels at 50 feet for typical construction equipment would range up to 89 dB for the type of equipment normally used for this type of project, although the hourly noise levels would vary. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance. Project construction would take place both near and far from adjacent, existing noise-sensitive uses. For example, construction of the project along the eastern project boundary would take place within approximately 80 to 100 feet of existing noise-sensitive land uses (a church and residences). However, during construction within other areas of the project site, construction activities would be located 500 feet or more from noise-sensitive uses.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. The RCNM is often used for non-roadway projects because the same types of construction equipment used for roadway projects are also used for other types of projects. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Using the FHWA's RCNM construction noise model and construction information (types and number of construction equipment by phase), the estimated noise levels from construction were calculated for a representative range of distances, as presented in Table 3.12-5 (Construction Noise Model Results Summary). The RCNM inputs and outputs are provided in Appendix E.

Table 3.12-5. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (L_{eq} (dBA))	
	Nearest Construction Work	*Typical Construction Work*
Phase 1: Demolition - New Auditorium	71	66
Phase 2: Remodeling - Building J	70	70

Table 3.12-5. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (L_{eq} (dBA))	
	Nearest Construction Work	*Typical Construction Work*
Phase 3: Site Preparation - New Auditorium	71	66
Phase 4: Trenching - New Auditorium	71	66
Phase 5: Grading - New Auditorium	73	68
Phase 6: Architectural Coatings - Building J	62	61
Phase 7: Building Construction - New Auditorium	68	63
Phase 8: Site Preparation - Rehearsal Rooms	66	65
Phase 9: Trenching - Rehearsal Rooms	66	65
Phase 10: Grading Rehearsal Rooms	68	68
Phase 11: Building Construction - Rehearsal Rooms	64	63
Phase 12: Architectural Coatings -New Auditorium	60	55
Phase 13: Demolition - Music Building	81	77
Phase 14: Architectural Coatings - Rehearsal Rooms	55	54
Phase 15: Site Preparation - Music Building	81	77
Phase 16: Trenching - Music Building	81	77
Phase 17: Grading - Music Building	83	80
Phase 18: Building Construction - Music Building	78	75
Phase 19: Architectural Coatings - Music Building	71	66

Source: Appendix E
Note: L_{eq} = equivalent continuous sound level

As shown in Table 3.12-5, the highest noise levels are predicted to occur during grading activities during Phase 17, when noise levels from construction activities would be as high as 83 dBA L_{eq} at the nearest existing residences, approximately 80 feet away. However, construction noise levels would typically range from approximately 55 to 80 dBA L_{eq}. Based upon the ambient noise measurement data collected (as shown in Table 3.12-1), the limitation for construction noise, as established by the City, would be 64 dBA L_{eq} (the existing ambient levels) plus 20 dB, which is 84 dBA L_{eq}. Based upon the construction noise analysis, the City's noise standards would not be exceeded. Therefore, noise impacts from construction are considered **less than significant**. No mitigation is required.

On-Site Operational Noise

Less Than Significant Impact. The proposed project would not increase the existing number of students or faculty and would not add additional uses to the campus that are not currently present. Before the existing auditorium on the JAMS campus was closed for safety concerns, the auditorium was used for JAMS events and was also loaned to outside entities, such as church groups, community music and dance groups, and Santa Monica College. The auditorium has not supported such uses for the past four years. Upon

implementation of Phase 1 of the project, which includes construction of the new auditorium, use of the auditorium for both JAMS events and outside events would commence. The frequency of events held at the new auditorium is expected to increase relative to the previous scheduling.

Event sizes are anticipated to range significantly. Based upon prior event attendance at the JAMS auditorium and information provided by the District, approximately 20% of events would be at-capacity (the old theater had a capacity of 650 people, while the proposed new theater would have a capacity of 750 people); 30% of events would be attended at approximately 75% capacity; 40% of events would be attended at approximately 50% capacity; and 10% of events would be attended at less than 25% capacity. Assuming that the future attendance trends are similar to past attendance history, average event attendance with the new auditorium would increase approximately 15%, from 406 people to 469 people. In terms of any change in noise related to the audience size increase, the corresponding increase would be approximately 0.6 decibel (i.e., less than 1 dB), which is not an audible change in the context of community noise (i.e., outside of a listening lab or other controlled environment).[11] Additionally, the new auditorium would include acoustical wall panels, sound locks, and concrete masonry unit/double stud construction in order to ensure that sound transmission into the community is negligible.

The proposed terrace may have chamber music, small jazz combos, and lightly amplified music during some events. The terrace would be located approximately 450 feet from the nearest noise-sensitive land uses, and noise-sensitive uses would be visually and acoustically shielded from the courtyard by the auditorium and music building. Therefore, noise from outdoor musical events is not anticipated to impact nearby residences. Furthermore, all JAMS events would end by 10:00 p.m. Thus, on-site operational noise impacts would be **less than significant**. No mitigation is required.

Off-Site Operational (Traffic) Noise

Less Than Significant Impact. The proposed project would add vehicle trips along local roadways when events are being held at the auditorium. According to the project's traffic analysis (Appendix F2), a fully attended event would generate 250 total vehicle trips. Although the number of auditorium seats would increase from 600 to 750 seats, weekday events where the auditorium is likely to be at capacity are anticipated to occur less than 10 days per year. Therefore, the project would not generate new (permanent) traffic within the project area. Traffic volume data from the traffic analysis for a fully attended event during PM peak hour conditions was modeled using the Federal Highway Administration's Traffic Noise Model (TNM version 2.0) (FHWA 2004).

[11] The estimated increase is based upon the following equation for the relation: Delta (change in noise) = 10*Log(P2/P1), where P2 = average attendance figure with the proposed project, and P1 = prior average attendance figure. Reference: Harris 1991

The results of the traffic modeling for Existing Conditions without Event Traffic and Existing Conditions with Event Traffic are summarized in Table 3.12-6 (Traffic Noise – Existing Conditions & Existing Conditions with Event Traffic), and the traffic noise modeling data is shown in Appendix E. The project-related traffic would result in a noise level increase of 1 decibel (dB) CNEL or less (rounded to whole numbers) along the roadways in the project area. None of the modeled receivers would exceed the "Clearly Compatible" 60 dBA CNEL noise standard (City of Santa Monica 1992) for residences as a result of the increase in project-related traffic (see Table 3.12-2). Additionally, noise increases would be less than the 3 dB threshold at which the change in community noise level would be audible (Caltrans 2013). Therefore, traffic related to the proposed project would not exceed any noise standards and would not substantially increase the existing noise levels in the project vicinity, and operational traffic-related noise impacts would be **less than significant**. No mitigation is required.

Table 3.12-6. Traffic Noise – Existing Conditions & Existing Conditions with Event Traffic

Modeled Receptor	Existing Noise Level (dBA CNEL)	Existing with Event Traffic Noise Level (dBA CNEL)	Noise Level Increase (dB)
ST1	45	46	1
ST2	61	62	1
ST3	63	63	0
ST4	61	62	1
M1	61	62	1
M2	68	68	0
M3	59	59	0
M4	59	60	1
M5	56	56	0
M6	56	57	1
M7	53	53	0
M8	66	66	0
M9	57	58	1
M10	58	58	0

Source: Appendix E.

The noise level increases associated with additional traffic volumes under future (year 2022) without event traffic conditions and future with event traffic conditions are summarized in Table 3.12-7 (Traffic Noise – Future Conditions & Future Conditions with Event Traffic). None of the modeled receivers would exceed the 60 dBA CNEL noise standard as a result of the increase in project-related traffic. The noise level increases associated with the project under future traffic conditions would be 1 dB or less (rounded to whole numbers). Therefore, traffic related to the proposed project would not exceed any noise standards and would

not substantially increase the existing noise levels in the project vicinity. Operational traffic-related noise impacts would be **less than significant**. No mitigation is required.

Table 3.12-7. Traffic Noise – Future Conditions & Future Conditions with Event Traffic

Modeled Receptor	Future without Event Traffic Noise Level (dBA CNEL)	Future with Event Traffic Noise Level (dBA CNEL)	Noise Level Increase (dB)
ST1	45	46	1
ST2	62	63	1
ST3	63	64	1
ST4	61	62	1
M1	62	62	0
M2	69	69	0
M3	59	60	1
M4	60	60	0
M5	56	57	1
M6	57	57	0
M7	54	54	0
M8	66	66	0
M9	58	58	0
M10	58	58	0

Source: Appendix E.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction

Less Than Significant Impact. Construction activities that might expose persons to excessive groundborne vibration or groundborne noise could cause a potentially significant impact. Groundborne vibration information related to construction activities has been collected by Caltrans (Caltrans 2013). Information from Caltrans indicates that transient vibrations (such as construction activity) with a peak particle velocity of approximately 0.035 inch per second may be characterized as barely perceptible, and vibration levels of 0.24 inch per second may be characterized as distinctly perceptible. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inch per second or less at a distance of 25 feet (DOT 2006).

Groundborne vibration is typically attenuated over short distances. At the nearest existing noise/vibration-sensitive land uses (a church and residential uses), the peak particle velocity would be approximately 0.016 inch per second, given the types of construction equipment that are anticipated to be used for the project and

the distance between the project site and the nearest sensitive receptor (approximately 80 feet). This vibration level is well below the threshold of "barely perceptible" that is established by Caltrans.

Impacts from construction vibration may also occur if the vibration is strong enough to damage nearby buildings. However, construction vibration as a result of the proposed project would not result in structural building damage, which typically occurs at vibration levels of 0.5 inch per second or greater for buildings of reinforced-concrete, steel, or timber construction. Therefore, excessive groundborne vibration and groundborne noise would not be generated. Impacts related to groundborne vibration would be **less than significant**. No mitigation is required.

Operation

Less Than Significant Impact. As described in 3.12(a), once operational, the project would facilitate an increase in the number of events held at the auditorium. However, the general nature of the events is not anticipated to change relative to pre-2014 conditions, and groundborne vibration from these live performances would be negligible. Vibration during operation would be **less than significant**. No mitigation is required.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. As described in 3.12(a), once operational, the project would facilitate an increase in event attendance, with a corresponding increase in project-related vehicle traffic when an event is being held. As shown in Table 3.12-6, noise from project-related traffic is anticipated to result in an increase of 1 dB or less, which is not an audible change in the context of community noise (i.e., outside of a listening lab or other controlled environment). Thus, the project would not result in a substantial permanent increase in ambient noise levels. Impacts would be **less than significant**. No mitigation is required.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation Incorporated. As described in 3.12(a) and as shown in Table 3.12-5, noise from construction activities are predicted to range from approximately 55 to 83 dBA L_{eq}. The estimated increase above measured ambient noise levels would be as high as 19 dB, during the loudest construction phase. As explained in Section 3.12(a), this increase would not violate applicable construction noise standards established by the City. However, this increase is considered to be substantial, since construction would occur adjacent to a residential neighborhood and would occur over the course of several years. Therefore, this impact is considered potentially significant. The implementation of mitigation measures **MM-NOI-1** and **MM-NOI-2** would reduce the impact to a less than significant level. As such, impacts

related to temporary and periodic increases in noise levels would be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-NOI-1 Construction activities shall take place during the permitted time and day per Section 4.12.110 of the City's Municipal Code. The Santa Monica-Malibu Unified School District shall ensure that construction activities for the proposed project are limited to the hours of 8 a.m. to 6 p.m. Monday through Friday, 9 a.m. to 5 p.m. on Saturday and that construction does not occur at all during other hours or on Sundays or federal holidays. This condition shall be listed on the project's final design to the satisfaction of the City of Santa Monica Planning and Community Development Department.

MM-NOI-2 The Santa Monica-Malibu Unified School District shall adhere to the following measures for all phases of the proposed project as a condition of approving the grading permit:

i. The project contractor shall, to the extent feasible, schedule construction activities to avoid the simultaneous operation of construction equipment so as to minimize noise levels resulting from operating several pieces of high noise level emitting equipment.
ii. All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Enforcement shall be accomplished by random field inspections by Santa Monica-Malibu Unified School District personnel during construction activities.
iii. Construction noise reduction methods such as shutting off idling equipment, construction of a temporary noise barrier, maximizing the distance between construction equipment staging areas and adjacent residences, and use of electric air compressors and similar power tools, rather than diesel equipment, shall be used where feasible.
iv. During construction, stationary construction equipment shall be placed such that emitted noise is directed away from or shielded from sensitive receptors.
v. As specified in Section 4.12.120 of the City's Municipal Code, signage shall be posted at the project site entrance with permitted construction work hours, the Santa Monica-Malibu Unified School District telephone numbers where violations can be reported, the location of the job site, and the permit number issued authorizing the work.

Effectiveness of these mitigation measures would vary from several decibels (which in general is a relatively small change) to ten or more decibels (which subjectively would be perceived as a substantial change), depending upon the specific equipment and the original condition of that equipment, the specific locations of the noise sources and the receivers, etc. Installation of a noise barrier, for example, would vary in effectiveness depending upon the degree to which the line-of-sight between the source and receiver is broken, and typically ranges from 5 to 10 dB. Installation of more effective silencers could range from several decibels to well over 10 decibels. Reduction of

idling equipment could reduce overall noise levels from barely any reduction to several decibels. Cumulatively, however, these measures would result in substantial decreases in noise from construction. With the implementation of these mitigation measures, short-term construction impacts associated with the exposure of persons to, or generation of, noise levels in excess of established standards would be **less than significant mitigation incorporated**.

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

Less Than Significant Impact. The proposed project is not located within an airport land use plan (Los Angeles County 2004). The nearest airport is Santa Monica Municipal Airport, located approximately 0.5 mile southeast of the project site. Based upon the County of Los Angeles Comprehensive Land Use Plan, the project site is not located within the Santa Monica Municipal Airport's Influence Area. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from the airport. Noise impacts would thus be **less than significant**. No mitigation is required.

f) Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed project is not located in the vicinity of a private airstrip (Airnav.com 2018). The proposed project would not expose people residing or working in the project area to excessive noise levels from a private airstrip. There would thus be **no impact**.

References

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Harris, Cyril M., ed. 1991. Handbook of Acoustical Measurements and Noise Control. Third Edition. McGraw-Hill, Inc. New York, NY.

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SOURCE: HGA Architects, 2017; Bing Maps

DUDEK

0 250 500 Feet

FIGURE 3.12-1

Noise Measurement and Modeling Locations

John Adams Middle School Auditorium Replacement Project

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3.13 Population and Housing

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

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

No Impact. The proposed project would involve the replacement of existing performing arts buildings at the JAMS campus and has been designed to meet current needs for seating and rehearsal spaces at JAMS. The proposed project would not increase the existing number of students or staff and would not add additional uses to the campus that are not currently present. The proposed project would not extend roads or other infrastructure to areas that do not currently receive such services. For these reasons, the proposed project would not expand residential uses, employment opportunities, or infrastructure and would not, therefore, cause direct or indirect population growth in the project area. **No impact** would occur.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site does not contain existing houses. As such, the proposed project would not displace any existing housing. **No impact** would occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently developed with an auditorium, a music building, and a lawn area. As such, the project site does not contain housing. The proposed replacement of these uses with new performing

arts buildings would not have the potential to displace substantial numbers of people. Construction of replacement housing would not be necessary, and **no impact** would occur.

References

None.

3.14 Public Services

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

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

Fire protection?

Less Than Significant Impact. The City of Santa Monica Fire Department (SMFD) operates four fire stations throughout the City. First response service to the JAMS campus would be provided by Fire Station 5, which is located at 2450 Ashland Avenue, approximately 1 roadway mile from the project site. Station 5 has one paramedic engine company, one aircraft rescue fire fighting vehicle, one reserve engine, and one reserve ladder truck (SMFD 2018).

The proposed project would not result in an increase in enrollment or faculty at the JAMS campus that would increase demand on fire protection services. Use of the auditorium for events could require fire protection

services, if a fire or safety emergency occurred during the event. However, use of the auditorium for events is consistent with surrounding institutional uses, such as churches and Santa Monica College, which support special events. As such, the project area is characterized as an active urban area with periodic influxes in visitors. The addition of periodic events in the JAMS auditorium would not substantially change these existing conditions such that new or expanded fire facilities would be required. Furthermore, the proposed project would be subject to current SMFD requirements for fire sprinkler systems, fire alarm systems, fire flow, and equipment and firefighter access, as well as fire code requirements. Compliance with the fire code standards would be ensured through the plan check process and would reduce the potential demand for fire services at the project site. Implementation of required fire safety design provisions of the SMFD, as well as District design standards, would reduce the likelihood of a fire emergency at the project site, thereby reducing potential demand for fire services. For these reasons, impacts would be **less than significant**, and no mitigation is required.

Police protection?

Less Than Significant Impact. The Santa Monica Police Department (SMPD) provides police protection services for the City, including the project site. The JAMS campus is located within SMPD's Beat 2, which is bounded by Pico Boulevard to the north, Bundy Drive to the east, Dewey Street to the south, and 2nd Street to the west (SMPD 2018). The SMPD operates out of one main station located 333 Olympic Boulevard, approximately 1.5 roadway miles from the project site. Response times to high-priority emergency calls averaged approximately six minutes as of 2015 (City of Santa Monica 2015).

The proposed project would not result in an increase in enrollment or faculty at the proposed project site that would increase demand on police protection services. Use of the auditorium for events could require police protection services, if an emergency requiring police personnel occurred during the event. However, use of the auditorium for events is consistent with surrounding institutional uses, such as churches and Santa Monica College, which support special events. As such, the project area is characterized as an active urban area with periodic influxes in visitors. The addition of periodic events in the JAMS auditorium would not substantially change these existing conditions such that new or expanded police facilities would be required. As such, current service levels would not be substantially impacted by the proposed project, and no new or physically altered police facilities would be necessary. Therefore, the proposed project would result in a **less than significant** impact to police services, and no mitigation is required.

Schools?

No Impact. The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to require a new school. The proposed project is intended to better serve the attending schoolchildren and community by replacing aging and structurally unsafe performing arts facilities with new facilities that would meet current needs for performing arts space and current standards for accessibility, safety, and theater technology. Accordingly, the proposed project would not increase enrollment or

faculty at JAMS. As such, the proposed project would not involve construction of school facilities, other than the construction of the proposed performing arts complex that is discussed and analyzed for its environmental effects throughout this MND. As explained and substantiated throughout this document, the proposed project would not result in significant impacts on the environment. As described in Section 3.13(a) of this MND, the proposed project would not directly or indirectly trigger population growth having the potential to create the need for new school facilities. For these reasons, no new school facilities would be required by the project, outside of those that are proposed as part of the project. **No impact** would occur.

Parks?

No Impact. The existing JAMS campus includes recreational facilities that are used by the student body and the public. Residential development typically has the greatest potential to result in impacts to parks, since new residences generate a permanent increase in population. The proposed project does not include development of any residential or commercial uses. As explained in Section 3.13(a), the proposed project would not generate any new permanent residents or employees who would substantially increase the demand for local and regional park facilities. For these reasons, the proposed project would result in no impact involving a need for new or expanded park facilities. As such, **no impact** to parks would occur as a result of the proposed project.

Other public facilities?

No Impact. The proposed project does not include development of residential or commercial uses and would not increase the demand for other public facilities, such as library services or City administrative services. Additionally, as described in Section 3.13 of this document, the proposed project would not result in indirect population growth, which could increase demand for public facilities. As such, **no impact** to other public facilities would occur.

References

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SMPD (Santa Monica Police Department). 2018. "Neighborhood Resource Officers." Santa Monica Police Department Webpage. Accessed January 23, 2018. https://santamonicapd.org/nro/.

References

None.

3.15 Recreation

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

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Residential development typically has the greatest potential to result in impacts to parks, since new residences generate a permanent increase in population, which can increase demand on parks in the area. As described in Sections 3.13 and 3.14, the proposed project would not generate new permanent residents. Construction personnel working at the project site could potentially use parks throughout the City during the temporary construction period. However, due to the limited nature and duration of the construction activities, as well as the small number of personnel required, construction would not introduce new workers to the City such that new park facilities would be required. Upon project implementation, the existing student body and faculty at JAMS would continue to use the recreational facilities available at the JAMS campus and in the surrounding areas. Usage of such facilities is not expected to increase as a result of the proposed project. Additionally, the replacement of the existing auditorium at the JAMS campus will provide an additional recreational amenity for the community that has not been available since 2014. As such, **no impacts** involving substantial physical deterioration of the recreational facilities would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

No Impact. The proposed project would include development of a terrace area and a courtyard within the project site. These facilities are evaluated for environmental impacts as part of the proposed project. As

described and substantiated throughout this MND, the environmental impacts of the proposed project, including those of the terrace area and courtyard, would not be significant. As described under Sections 3.14 and 3.15(a), the proposed project would not be associated with an increase in student enrollment or faculty at JAMS, nor is the proposed project expected to directly or indirectly cause population growth, as explained in Section 3.13(a). The student body and faculty JAMS is expected to continue to use the recreational facilities available within the JAMS campus and in the surrounding areas of the City. It should be noted that the proposed project would involve the removal of a small portion of an existing lawn at JAMS. However, the majority of the lawn would remain, and terrace and courtyard areas that would be installed as part of the proposed project would serve a similar function as the lawn (i.e., they would provide gathering and seating areas for students, staff, and/or visitors to the campus). As such, the removal of a small portion of the existing lawn is not expected to lead to the construction or expansion of recreational facilities elsewhere. **No impacts** would occur.

References

None.

3.16 Transportation and Traffic

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact with Mitigation Incorporated. The City has established performance criteria for the operation of intersections and for parking. The project's consistency with those criteria are discussed in this section. Policies for alternative modes of transportation are addressed in the CHPS standards and in the City's General Plan Land Use and Circulation Element. The project's consistency with CHPS standards and General Plan policies for alternative transportation is addressed in Section 3.16(f) below.

The project's consistency with intersection performance criteria is addressed in the paragraphs below, followed by an analysis of the proposed parking plan. The traffic engineering firm Transpo Group prepared construction and operational transportation analyses for the proposed project, which are included in this MND as Appendix F1 (construction transportation analysis) and Appendix F2 (operational transportation analysis). The transportation analyses evaluate the proposed project pursuant to CEQA and in accordance with the City's guidelines, methodology, and criteria for traffic impacts. The City's performance criteria for its intersections are generally based on existing-plus-project level of service (LOS) and on increased vehicle delay measured in seconds at an intersection. The City has also established significance criteria that are used to determine whether a proposed project would have a significant effect on an intersection. For unsignalized intersections, the City does not have significance criteria; as such, for the evaluation of impacts to unsignalized intersections in the project area, the traffic evaluation relies on significance criteria from a neighboring city (City of Los Angeles) for determining the significance of potential impacts to unsignalized intersections in the project area. Measures of effectiveness for several selected intersections in the project vicinity are also established in the Los Angeles County Metropolitan Transportation Authority's 2010

Congestion Management Program (CMP). The CMP criteria established for intersections is based on LOS and/or increases in traffic demand measured using a volume-to-capacity ratio. Impacts evaluated under CMP criteria are further discussed in Section 3.16(b).

Below, the analysis and findings from Transpo Group's transportation analyses are summarized. The discussion is divided into potential effects during construction, potential effects during daily operation, potential effects associated with events that would be held at the auditorium during operation, and potential parking effects.

Construction

As described in Appendix F1, Transpo Group has evaluated potential impacts associated with the peak construction activities for the proposed project. The peak of construction activity and construction-related vehicle trips is expected to occur in 2019. The analysis focuses on the weekday morning peak period of traffic (7:00 a.m. to 9:00 a.m.) and the weekday evening peak period of traffic (4:00 p.m. to 6:00 p.m.). For the purposes of this analysis, the morning peak period will be called the "AM peak hour" and the evening peak period will be called the "PM peak hour." A number of intersections in the project area were selected, based on their proximity to the project site, typical travel patterns, and the professional judgement of qualified traffic engineers. Construction traffic (from both workers and trucks) is assumed to be restricted to Pico Boulevard, 16th Street, Pearl Street, and 17th Street south of Pearl Street. The intersections that were evaluated are as follows: 16 Street & Pearl Street; 17th Street & Pearl Street; 16th Street & Pico Boulevard; 17th Street & Pico Boulevard. These intersections are called "study area intersections" and are shown in Figure 3.16-1 (Study Area Intersections – Construction Analysis). The study area intersections have been assessed under four traffic scenarios for the construction traffic analysis:

1. Existing Conditions without Proposed Project Construction
2. Existing Conditions with Proposed Project Construction (during peak construction activity)
3. 2019 without Proposed Project Construction
4. 2019 with Proposed Project Construction (during peak construction activity)

These conditions are further discussed in the sections that follow.

Existing Conditions without Proposed Project Construction

Using the requirements and methodology specified by the City, LOS at the study area intersections was calculated, using traffic counts that were collected in the field. Existing peak hour traffic volumes are shown in Figure 3.16-2 (Existing Conditions without Construction – AM/PM Peak Hour Traffic Volumes), and existing intersection operations are shown in Table 3.16-1 (Existing Weekday Peak Hour Intersection LOS).

LOS A represents free-flow conditions with little delay, and LOS F represents over-saturated traffic flow throughout the peak hour. (See Appendix F1 for more detailed descriptions of the traffic that is experienced at each LOS designation.) As shown in Table 3.16-1, all of the study area intersections currently operate at LOS D or better during the weekday AM and PM peak hours under existing conditions. These levels of service are considered satisfactory.

Table 3.16-1. Existing Weekday Peak Hour Intersection LOS

Intersection	LOS Method	AM Peak		PM Peak	
		LOS	*Delay[1]*	*LOS*	*Delay[1]*
1. 16th St/Pearl St	HCM	C	17.5	B	14.2
2. 17th St/Pearl St	HCM	B	14.1	B	10.9
3. 16th St/Pico Blvd	HCM	C	22.4	B	13.7
4. 17th St/Pico Blvd	HCM	D	43.5	C	21.4

Source: Appendix F1

Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010

1 Delay measured in seconds/vehicle

Existing Conditions with Proposed Project Construction

Potential traffic impacts during the peak construction phase were documented and analyzed. The additional traffic generated by construction activities would be temporary. During the peak period of construction, the following assumptions were made relative to traffic: there would be 58 construction workers arriving at the site in the AM peak hour and leaving in the PM peak hour; there would be an average of 19 trucks per day; and, two haul trucks would arrive and depart from the project site in the AM peak hour and two haul trucks would arrive and depart the project site during the PM peak hour. (The truck trips were adjusted with a Passenger-Car Equivalence (PCE) factor of 2.5 PCE, to account for their larger size relative to passenger vehicles.)

As shown Appendix F1, the peak construction activity of the project would generate approximately 211 daily PCE trips, 78 AM PCE peak hour trips (68 inbound and 10 outbound), and 78 PM PCE peak hour trips (10 inbound and 68 outbound). Peak hour traffic volumes for existing conditions with project-related construction traffic are shown in Figure 3.16-3 (Existing Conditions with Construction – AM/PM Peak Hour Traffic Volumes (in PCE)). Using trip generation estimates for the most intensive period of construction, Transpo Group calculated the LOS for the study area intersections under the Existing Conditions with Proposed Project Construction scenario. The resulting LOS at each study area intersection was then compared to the LOS that occurs at each intersection under existing conditions. Results of this analysis and comparison are shown in Table 3.16-2 (Existing Conditions & Existing Conditions with Proposed Project Construction Weekday Peak Hour Intersection LOS).

Table 3.16-2. Existing Conditions & Existing Conditions with Proposed Project Construction Weekday Peak Hour Intersection LOS

Intersection	LOS Method	Existing				Existing with Construction Traffic				Change		Impact?	
		AM Peak		PM Peak		AM Peak		PM Peak					
		LOS	Delay[1]	LOS	Delay[1]	LOS	Delay[1]	LOS	Delay[1]	AM	PM	AM	PM
1. 16th St/ Pearl St	HCM	C	17.5	B	14.2	C	22.2	C	15.4	4.7	1.2	NO	NO
2. 17th St/ Pearl St	HCM	B	14.1	B	10.9	C	14.3	B	11.3	0.2	0.4	NO	NO
3. 16th St/ Pico Blvd	HCM	C	22.4	B	13.7	C	27.9	B	14.7	5.5	1.0	NO	NO
4. 17th St/ Pico Blvd	HCM	D	43.5	C	21.4	D	43.1	C	24.7	-0.4[2]	3.3	NO	NO

Source: Appendix F1
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010

1 Delay measured in seconds/vehicle
2 This decrease (in delay per vehicle) is not unusual, as the number of vehicles minimally increased

As shown in Table 3.16-2, all of the study intersections are forecast to continue to operate at LOS D or better during the AM and PM peak hours under the Existing Conditions with Proposed Project Construction. Under the City's significance criteria, project construction would not increase delays at study area intersections such that a significant impact would occur. Therefore, there would be no significant traffic impacts at the study area intersections with the addition of project construction traffic. (Refer to Appendix F1 for details on the City's significance criteria.)

2019 without Proposed Project Construction

Forecasts for 2019 traffic conditions were created by combining existing traffic conditions with traffic trips that are expected to be generated by development in the area that has been approved but not yet constructed. A list of these development projects, their locations, and the trips that each one is expected to generate can be found in Appendix F1. An intersection operations analysis was then conducted for the study area to evaluate the weekday AM and PM peak hour conditions that would be expected for 2019, without the additional traffic associated with construction of the proposed project. Traffic volumes under this condition are shown in Figure 3.16-4 (2019 without Construction – AM/PM Peak Hour Traffic Volumes). The results of this analysis are shown in Table 3.16-3 (2019 without Proposed Project Construction Weekday Peak Hour Intersection LOS). As shown in Table 3.16-3, all of the study area intersections continue to operate at LOS D or better during the weekday AM and PM peak hours under 2019 without Proposed Project Construction conditions.

Table 3.16-3. 2019 without Proposed Project Construction Weekday Peak Hour Intersection LOS

Intersection	LOS Method	AM Peak		PM Peak	
		LOS	*Delay[1]*	*LOS*	*Delay[1]*
1. 16th St/Pearl St	HCM	C	18.2	B	14.5
2. 17th St/Pearl St	HCM	B	14.5	B	11.0
3. 16th St/Pico Blvd	HCM	C	23.1	B	13.5
4. 17th St/Pico Blvd	HCM	D	47.5	C	25.9

Source: Appendix F1
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010
1 Delay measured in seconds/vehicle

2019 with Proposed Project Construction

The 2019 with Proposed Project Construction conditions were determined by adding the peak construction activity trip generation estimates to the 2019 without Proposed Project Construction traffic scenario. An intersection operations analysis was then conducted for the study area to evaluate the weekday AM and PM peak hour conditions that would be expected to occur in 2019, with the additional traffic associated with construction of the proposed project. Traffic volumes for this scenario are shown in Figure 3.16-5 (2019 with Construction – AM/PM Peak Hour Traffic Volumes (in PCE)). The results of this analysis are shown in Table 3.16-4 (2019 with Proposed Project Construction Weekday Peak Hour Intersection LOS). As shown in Table 3.16-4, all of the study area intersections are forecast to continue to operate at LOS D or better during the AM and PM peak hours in the 2019 with Proposed Project Construction conditions. Under the City's significance criteria, project construction would not increase delays at study area intersections such that a significant impact would occur.

Table 3.16-4. 2019 with Proposed Project Construction Weekday Peak Hour Intersection LOS

Intersection	LOS Method	2019 Baseline Conditions				2019 with Construction Traffic				Change		Impact?	
		AM Peak		*PM Peak*		*AM Peak*		*PM Peak*					
		LOS	*Delay[1]*	*LOS*	*Delay[1]*	*LOS*	*Delay[1]*	*LOS*	*Delay[1]*	*AM*	*PM*	*AM*	*PM*
1. 16th St/ Pearl St	HCM	C	18.2	B	14.5	C	23.2	C	15.7	5.0	1.2	NO	NO
2. 17th St/ Pearl St	HCM	B	14.5	B	11.0	C	14.7	B	11.4	0.2	0.4	NO	NO
3. 16th St/ Pico Blvd	HCM	C	23.1	B	13.5	C	28.1	B	14.7	5.0	1.2	NO	NO
4. 17th St/ Pico Blvd	HCM	D	47.5	C	25.9	D	47.0	C	31.0	-0.5[2]	5.1	NO	NO

Source: Appendix F1
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010
1 Delay measured in seconds/vehicle
2 This decrease (in delay per vehicle) is not unusual, as number of vehicles minimally increased

Conclusions for Construction Traffic Analysis

As shown above, proposed project construction would not significantly impact the operations of study area intersections under existing conditions or under 2019 conditions. Construction of the proposed project would not conflict with the City's measures of effectiveness for intersection operations. Impacts are considered **less than significant** during project construction. No mitigation is required.

Operation – Daily Operations

As identified in Appendix F2 and in Section 2.3, the proposed project would not increase the existing number of students, nor would it add additional uses to the campus. The number of auditorium seats would increase from approximately 600 seats to 750 seats upon project implementation; as such, additional traffic could result from events held at the auditorium. However, weekday events that are expected to result in a full auditorium would be limited. As stated in Appendix F2, weekday events where the auditorium is likely to be at capacity would occur fewer than 10 days each year. Therefore, the proposed project would not generate new, permanent traffic to the study area during operations. For these reasons, daily operations of the proposed project would not conflict with measures of effectiveness for the circulation system.

Operation – Event Traffic

As described in Section 2.3 of this MND, weekday events where the auditorium is likely to be at capacity are expected to occur fewer than 10 days per year during project operation. As such, a worst-case scenario for operational traffic impacts would occur during a weekday event where the auditorium is at capacity. Most weekday events would occur in the afternoon and evening. Therefore, the analysis of this scenario focuses on the weekday evening peak period of traffic (4:00 p.m. to 6:00 p.m.), called the "PM peak period." A number of intersections in the project area were selected to study for potential effects resulting from worst-case-scenario event traffic. These intersections are called "study area intersections." The study area intersections are as follows: 16 Street & Pearl Street; 17th Street & Pearl Street; 16th Street & Pico Boulevard; 17th Street & Pico Boulevard; 16th Street & Ocean Park Boulevard; 17th Street & Ocean Park Boulevard. These intersections include all major intersections that provide access to the proposed project and are the locations most likely to be affected by events held at the new auditorium. These intersections are shown in Figure 3.16-6 (Study Area Intersections – Operational Analysis). The study area intersections have been assessed under existing conditions and under conditions that would occur in the future (year 2022). The four traffic scenarios for the operational events analysis are as follows:

1. Existing Conditions without Event Traffic
2. Existing Conditions with Event Traffic (peak auditorium capacity)
3. 2022 without Event Traffic
4. 2022 with Event Traffic (peak auditorium capacity)

These conditions are further discussed in the sections that follow.

Existing Conditions without Event Traffic

Using the requirements and methodology specified by the City, LOS at the study area intersections was calculated, using traffic counts that were collected in the field. The existing PM peak hour traffic volumes are shown in Figure 3.16-7 (Existing Conditions without Event Traffic – PM Peak Hour Traffic Volumes). The existing intersection operations are shown in Table 3.16-5 (Existing Weekday PM Peak Hour Intersection LOS). LOS A represents free-flow conditions with little delay and LOS F represents over-saturated traffic flow throughout the peak hour. More detailed descriptions of the definition of each LOS are provided in Appendix F2. As shown in Table 3.16-5, all of the study area intersections currently operate at satisfactory LOS D or better during the weekday PM peak hour under existing conditions, except for the two-way stop-controlled (unsignalized) intersection of 16th Street and Ocean Park Boulevard. At this intersection, the minor approaches (along 16th Street) experience delays leading to LOS F along these approaches. A traffic signal warrant analysis was conducted for the intersection of 16th Street and Ocean Park Boulevard, and it was determined that this intersection warrants a signal under existing (without project) conditions. The 8-hour volume, the 4-hour volume, and peak hour volume warrants are all met. Once signalized this intersection operates at LOS A with an average delay of 6.7 seconds. The signal warrant analysis worksheets and signalization LOS worksheets are presented in Appendix F2.

Table 3.16-5. Existing Weekday PM Peak Hour Intersection LOS

Intersection	LOS Method	PM Peak	
		LOS	*Delay*[1]
1. 16th St/Pearl St	HCM	B	14.2
2. 17th St/Pearl St	HCM	B	10.9
3. 16th St/Pico Blvd	HCM	B	13.7
4. 17th St/Pico Blvd	HCM	C	21.4
5. 16th St/Ocean Park Blvd[2]	HCM (unsignalized)	F	179.5 [3]
6. 17th St/Ocean Park Blvd	HCM	A	7.8

Source: Appendix F2
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010
1 Delay is measured in seconds/vehicle
2 Two-way stop-controlled intersection. LOS and delay reported for the worst approach.
3 The calculation of delay is an exponential equation and delays shown within this range may be an overestimate. The numbers shown are provided for relative comparison.

Existing Conditions with Event Traffic

The traffic impacts of a full-capacity event (750 attendees) in the auditorium on the surrounding circulation system was analyzed for the proposed project. (As described above, the proposed project would not increase

the existing number of students, nor would it add additional uses to the site, and the auditorium's full-capacity events would happen less than 10 times a year. As such, the effects of event traffic that are identified in the discussion below are not considered permanent. Rather, they would be intermittent and temporary effects.)

The trip generation estimates for event traffic were determined based on peak event data provided by the District, with 750 people (maximum capacity) assumed to be in attendance. A vehicle occupancy factor of 1.5 is assumed, which accounts for multiple people per vehicle, as well as pedestrian traffic from the neighborhood. (The vehicle occupancy factor is based on a travel survey conducted by the Southern California Association of Governments.) To formulate a conservative scenario for the analysis of traffic impacts, it was assumed that 50% of the attendees would arrive during the PM peak hour. (As shown in Appendix F2, most of the events where the auditorium would be at full capacity would occur outside the PM peak hour, beginning either before or after the peak hour. As such, assuming that 50% of attendees could arrive during the PM peak hour represents a conservative assumption.) Using these assumptions, Transpo Group established a trip generation scenario in which 250 vehicle trips would occur in the PM peak hour, with 230 vehicles arriving at the site during this time (representing the attendees and 20 trips leaving the site during this time (representing deliveries associated with the event that may have occurred earlier in the day (e.g., equipment delivery, catering, etc.)). The PM peak hour traffic volumes under this scenario are shown in Figure 3.16-8 (Existing Conditions with Event Traffic – PM Peak Hour Traffic Volumes).

Using these volumes, the LOS for the study area intersections that would be expected under the Existing Conditions with Event Traffic scenario were calculated. The resulting LOS at each study area intersection was then compared to the LOS that occurs at each intersection under existing conditions. Results of this analysis and comparison are shown in Table 3.16-6 (Existing Conditions & Existing Conditions with Event Traffic Weekday PM Peak Hour Peak Hour Intersection LOS). As shown in Table 3.16-6, all of the study area signalized intersections are forecast to continue to operate at LOS C or better during the PM peak hours in this scenario. The two-way stop-controlled intersection at 16th Street and Ocean Park Boulevard operates at LOS F under existing conditions, with or without the addition of project-related event traffic. It should be noted that the calculation of delay is an exponential equation and delays shown within this range (LOS F) may be an overestimate. The delay numbers shown are provided for relative comparison only. As described above, signal warrants for this intersection are met under existing conditions.

Once signalized, this intersection would operate at LOS A, with an average delay of 7.0 seconds in the Existing Conditions with Event Traffic scenario, with no significant impacts attributable to the proposed project. The signal warrant analysis worksheets and signalization LOS worksheets are presented in Appendix F2.

Table 3.16-6. Existing Conditions & Existing Conditions with Event Traffic Weekday PM Peak Hour Peak Hour Intersection LOS

Intersection	LOS Method	Existing		Existing with Event Traffic		Change
		PM Peak		*PM Peak*		
		LOS	*Delay[1]*	*LOS*	*Delay[1]*	
1. 16th St/Pearl St	HCM	B	14.2	C	23.0	8.8
2. 17th St/Pearl St	HCM	B	10.9	B	12.2	1.3
3. 16th St/Pico Blvd	HCM	B	13.7	B	13.0	-0.7
4. 17th St/Pico Blvd	HCM	C	21.4	C	22.4	1.0
5. 16th St/Ocean Park Blvd[2]	HCM (unsignalized)	F	179.5	F	333.2	153.7
6. 17th St/Ocean Park Blvd	HCM	A	7.8	A	8.8	1.0

Source: Appendix F2
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010
1 Delay is measured in seconds/vehicle
2 The calculation of delay is an exponential equation and delays shown within this range may be an overestimate. The numbers shown are provided for relative comparison.

2022 without Event Traffic

Forecasts for 2022 traffic conditions were created by combining the existing traffic conditions with traffic trips that are expected to be generated from development that has been approved but not yet constructed. A list of these development projects, their locations, and the trips that each one is expected to generate can be found in Appendix F2. The PM peak hour traffic volumes for 2022 are shown in Figure 3.16-9 (2022 without Event Traffic – PM Peak Hour Traffic Volumes). An intersection operations analysis for the study area was then conducted to evaluate the weekday PM peak hour conditions that would be expected to occur in 2022, without the additional traffic associated with project-related event traffic. The results of this analysis are shown in Table 3.16-7 (2022 without Event Traffic Weekday PM Peak Hour Intersection LOS). As shown in Table 3.16-7, all signalized study area intersections continue to operate at LOS D or better during the weekday PM peak hours under year 2022 without Event Traffic conditions. As described above, the unsignalized intersection at 16th Street and Ocean Park Boulevard operates at LOS F. It should be noted that the calculation of delay is an exponential equation and delays shown within this range may be an overestimate. The numbers shown are provided for relative comparison. As described above, signal warrants for this intersection are met under existing conditions.

Once signalized, this intersection would operate at LOS A, with an average delay of 8.2 seconds for year 2022 without Event Traffic conditions. The signal warrant analysis worksheets and signalization LOS worksheets are presented in Appendix F2.

Table 3.16-7. 2022 without Event Traffic Weekday PM Peak Hour Intersection LOS

Intersection	LOS Method	PM Peak	
		LOS	*Delay*[1]
1. 16th St/Pearl St	HCM	C	16.9
2. 17th St/Pearl St	HCM	B	11.7
3. 16th St/Pico Blvd	HCM	B	14.1
4. 17th St/Pico Blvd	HCM	D	52.7
3. 16th St/Ocean Park Blvd	HCM (unsignalized)	F	847.6 [2]
4. 17th St/Ocean Park Blvd	HCM	A	9.8

Source: Appendix F2
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010
1 Delay measured in seconds/vehicle
2 The calculation of delay is an exponential equation and delays shown within this range may be an overestimate. The numbers shown are provided for relative comparison.

2022 with Event Traffic

The 2022 with Event Traffic conditions were determined by adding the peak event trip generation estimates to the 2022 without Event Traffic scenario. The PM peak hour traffic volumes under this scenario are shown in Figure 3.16-10 (2022 with Event Traffic – PM Peak Hour Traffic Volumes). An intersection operations analysis was then conducted for the study area to evaluate the weekday PM peak hour conditions that would be expected to occur in 2022, with the additional traffic associated with an event where the auditorium is at maximum capacity. The results of this analysis are shown in Table 3.16-8 (2022 with Event Traffic Weekday PM Peak Hour Intersection LOS). As shown in Table 3.16-8, all of the signalized study area intersections are forecast to continue to operate at LOS D or better during the PM peak hour for 2022 with Event Traffic conditions.

The unsignalized intersection of 16th Street and Ocean Park Boulevard is at LOS F for 2022 with Event Traffic conditions. It should be noted that the calculation of delay is an exponential equation and delays shown within this range (LOS F) may be an overestimate. The delay numbers shown are provided for relative comparison only. As described above, signal warrants for this intersection are met under existing conditions.

Once signalized, this intersection operates at a LOS A with an average delay of 8.5 seconds in the 2022 with Event Traffic conditions during the PM peak hour. The signal warrant analysis worksheets and signalization LOS worksheets are presented in Appendix F2. Once the intersection of 16th Street and Ocean Park Boulevard has been signalized, the proposed project would not increase the delays at this intersection, per the City's significance criteria.

Table 3.16-8. 2022 with Event Traffic Weekday PM Peak Hour Intersection LOS

Intersection	LOS Method	2022 Baseline		2022 with Event Traffic		Change
		PM Peak		*PM Peak*		
		LOS	*Delay*[1]	*LOS*	*Delay*[1]	**PM**
1. 16th St/Pearl St	HCM	C	16.9	D	28.5	11.6
2. 17th St/Pearl St	HCM	B	11.7	B	13.5	1.8
3. 16th St/Pico Blvd	HCM	B	14.1	B	14.0	-0.1
4. 17th St/Pico Blvd[2]	HCM	D	52.7	D	52.2	-0.5
5. 16th St/Ocean Park Blvd[3]	HCM (unsignalized)	F	847.6	F	1463.8	616.2
6. 17th St/ Ocean Park Blvd	HCM	A	9.8	A	11.6	1.8

Source: Appendix F2
Notes: LOS = Level of Service; HCM = Highway Capacity Manual 2010
1 Delay measured in seconds/vehicle
2 This decrease (in delay per vehicle) is not unusual as number of vehicles minimally increased.
3 The calculation of delay is an exponential equation and delays shown within this range may be an overestimate. The numbers shown are provided for relative comparison.

Conclusions for Operational Analysis

As shown above, at-capacity events during project operation would not significantly impact the operations of study area intersections under existing conditions or future conditions. Operation of the proposed project would not conflict with the City's measures of effectiveness for intersection operations. Impacts would therefore be **less than significant**, and no mitigation is required.

Parking Analysis

The City of Santa Monica Municipal Code (Section 9.28.060 Off-Street Parking) sets the requirements for off-street parking for various land uses. While the design of the project is not subject to the City's land use plans and policies, a discussion and analysis of the proposed project relative to the City's parking regulations is provided herein for informational purposes. Per code, the parking required for John Adams Middle School is 2 spaces per classroom, which equates to 86 parking spaces, given that the campus has 43 classrooms. This is less than the 102 spaces currently provided on campus. If categorized as a "community assembly" under the City's parking regulations, the JAMS auditorium has a parking requirement of 1 space for every 4 seats in the auditorium. As such, the 750-seat auditorium would require 188 parking spaces per code. Descriptions of parking requirements for different uses of the auditorium are provided below. This discussion is based on parking analysis presented in Appendix F2.

Typical Weekday Event

As per the events schedule illustrated in Appendix F2, typical weekday events are those that would occur as part of the school curriculum (rehearsals, class meetings, etc.), whereby the auditorium is used for curricular activities, and only students and/or faculty would be present. Such events would not draw additional trips to the school and, therefore, are not likely to affect parking demand in the area. Under this scenario, the existing parking supply of 102 spaces at JAMS would continue to accommodate the existing demand of 86 spaces corresponding to the campus' 43 classrooms.

Large Weekday Event

This scenario assesses parking during a full-capacity weekday event, which would draw additional vehicular trips to the campus and would therefore require more parking than a typical weekday event.

As per the schedule of events illustrated in Appendix F2, there are various events that may occur in the afternoon and evening hours that may also command an attendance of about 750 people (full capacity). As all such events are expected to occur after school hours, it is assumed that the school parking lots would be generally available for such events. However, it is assumed that on-street parking would be limited due to on-going classes at the adjacent Santa Monica College. A conservative analysis assumes a full-capacity auditorium event with no on-street parking availability.

There are various alternative options for travel to the auditorium, including transit (buses), bike and bike share stations, car-share options, and walking. However, for the purposes of conducting a conservative analysis, it is assumed that the number of parking spaces available should conform to the City's code requirements for "community assembly" land uses. As such, 188 spaces should be available for full-capacity events.

With 102 spaces available for parking on the JAMS campus, there would be an unmet on site demand of 86 spaces. Historically, this demand for parking has been accommodated by the parking spaces provided by Santa Monica College, to avoid neighborhood parking. Without provision for parking at Santa Monica College for large weekday events, a significant effect could occur due to conflicts with the City's measures of effectiveness for parking. As such, mitigation measure **MM-TRF-1** would be implemented, which would require the District to develop a Memorandum of Understanding with Santa Monica College to use available college parking for full-capacity weekday events. Upon adherence to mitigation measure **MM-TRF-1**, impacts would be less than significant.

Typical Weekend Event (Sunday Church Services)

Church services that would likely occur every Sunday at 9:30 a.m. and 11:30 a.m. are considered typical weekend events. Both of these services are expected to be attended by approximately 750 people (full capacity) and would occur on non-school days. While the two-hour offset between the two services would allow for some attendees

of the first service to leave the site before the second service attendees start arriving, there would likely be some overlap between both services. A conservative analysis assumes that the overlap would be on the order of 50%, whereby half of attendees of the second service arrive when the first service attendees have not yet vacated their parking spaces. Per code, the number of spaces needed for a full-capacity auditorium is 188 spaces. Assuming the conservative scenario in which attendees of the two services may overlap, the number of parking spaces required at the start of the second services would be approximately 282 spaces (188 + 188 x 50%). While there are 102 spaces that would be available on campus, a demand for about 180 parking spaces would remain. There are approximately 120 on-street parking spaces on Pearl Street that would mostly be available for use by the church on Sundays (during weekdays these are used mainly by Santa Monica College students), as well as about 60 parking spaces along the west side of 16th Street and the east side of 17th Street. Assuming that 120 on-street parking spaces would be available, there would be an unsatisfied parking demand of about 60 spaces during full-capacity, overlapping weekend events. Historically, this demand for parking has been accommodated by the parking spaces provided by Santa Monica College, to avoid neighborhood parking. Without provision for parking at Santa Monica College for overlapping Sunday church services, a significant effect could occur due to conflicts with the City's measures of effectiveness for parking. As such, mitigation measure **MM-TRF-1** would be implemented, which would require the District to develop a Memorandum of Understanding with Santa Monica College to use available college parking for Sunday church services. Upon adherence to mitigation measure **MM-TRF-1**, impacts would be less than significant.

Conclusions for Parking Analysis

As substantiated above, parking for the proposed project would generally be accommodated by the existing parking stock at the JAMS campus. However, during large weekday events and Sunday church services, parking demand may exceed the available parking stock, and a potentially significant effect could occur due to conflicts with the City's parking standards. However, upon implementation of mitigation measure **MM-TRF-1**, sufficient parking would be made available in the project area. Impacts would, therefore, be **less than significant with mitigation incorporated**. No further mitigation is required.

MM-TRF-1 The Santa Monica-Malibu Unified School District shall develop a Memorandum of Understanding to share parking with Santa Monica College, whereby Santa Monica College will provide approximately 100 spaces for weekday events and approximately 70 spaces for Sunday church services.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. The Los Angeles County Congestion Management Program (CMP) requires evaluation of all CMP arterial monitoring intersections where a project would add 50 or more new peak hour

trips at that intersection. The nearest CMP monitoring intersection to the project site is the intersection of Lincoln Boulevard with Pico Boulevard, which is less than one mile away from the project site. Due to the number of project-related trips that would be generated and the location of the intersection and its distance from the project site, it is unlikely that 50 peak hour trips would be added to this intersection. (Up to 25 trips are forecasted to be added at this location during an at-capacity event at the new auditorium, which falls well below the threshold of 50 peak hour trips.) The CMP also requires CMP freeway mainline monitoring locations to be evaluated when a project would add 150 or more trips at the monitoring location. The nearest CMP freeway monitoring location to the project site is located approximately one mile from the project site, on I-10 Freeway at Lincoln Boulevard. The project would not add 150 trips to this CMP freeway mainline monitoring station. (Up to 25 trips are forecasted to be added at this location during an at-capacity event at the new auditorium, which falls well below the threshold of 150 trips.) Based on the trip generation that would be attributable to the project, no further analysis of CMP intersections or freeway mainline segments is required per the Los Angeles County CMP guidelines, indicating that project trip generation falls below the thresholds established in the CMP. Therefore, the project is not anticipated to result in significant impacts at CMP monitoring locations. As such, the project would not conflict with the applicable congestion management program. Impacts would be **less than significant**, and no mitigation is required.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. An increase in air traffic levels is generally caused by residential development that creates population growth to the extent that the use of airports increases. The proposed project would not involve residential development; therefore, an increase in air traffic levels would not occur.

Air traffic safety risks are generally associated with increased heights in the vicinity of airports, to an extent that air traffic patterns would need to change or to the extent that a hazard is created. The proposed project area is located approximately 0.5 miles from the Santa Monica Airport. The Federal Aviation Administration (FAA) has established a 200-foot height standard to determine whether markings and/or lighting is required for temporary and permanent structures (FAA 2007). The proposed auditorium and music building would be slightly taller than the existing auditorium and music building that are proposed for removal; however, the highest portions would be approximately 54.5 feet in height, which is well below the FAA height standard. As such, the proposed project would not introduce an airport safety hazard, and **no impact** would occur as a result of the proposed project.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. During construction, activities may result in periodic sidewalk and lane closures along the project site's street frontages. Sidewalk and lane closures have the potential to result in

safety hazards if pedestrians try to navigate around the closure by entering a traffic lane or if drivers engage in unsafe behavior to navigate around a closure. In the event that temporary sidewalk and/or lane closures are required during construction, such closures would be marked with appropriate detour signage, and pedestrians and vehicles would be safely routed around the closure. The proposed project would not involve permanent changes to sidewalks or off-site pedestrian circulation. As described under Section 3.8(r), existing sidewalks along the project site's street frontages would remain in place under the proposed project. Due to the temporary nature of any potential closures and facilitation of safe pedestrian and vehicular movement around the closure, potential impacts related to increased hazards during construction would be less than significant.

The proposed project would involve replacement of existing performing arts building at the JAMS campus. As such, the proposed project would not change the land use of the site such that an incompatible use is permanently introduced to the area. The internal pedestrian circulation of the project site may change under the proposed project; however, any new pedestrian pathways and internal circulation would be designed in accordance with California Department of Education guidelines. Changes to the pedestrian pathways and internal circulation are not expected to introduce a safety hazard. For these reasons, the proposed project would not substantially increase roadway hazards due to a design features or an incompatible use, and impacts would be **less than significant**. No mitigation is required.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. Inadequate emergency access may occur if emergency access is obstructed by the project or if new driveways, roadways, or fire truck turnaround areas are insufficient to accommodate the necessary emergency equipment. Construction activities associated with the proposed project may involve temporary, localized sidewalk and lane closures, which could potentially preclude emergency personnel from accessing areas of the project site that are immediately adjacent to the closure. However, sidewalk and lane closures would be temporary and localized. During a closure, appropriate emergency access and detour signage would be provided. Once construction activity is complete, full sidewalk and lane access would be re-established. Due to the temporary nature of any potential closures and facilitation of safe movement around the closure, significant impacts to emergency access during construction would not occur. Furthermore, as substantiated in Section 3.16(a), the operation of the vehicular circulation system would not be substantially compromised by construction traffic.

Implementation of the proposed project may alter the current configuration of emergency access to the project site, since the project would involve new structures on the project site. However, the new site design would allow for emergency access, pursuant to relevant fire department, California Department of Education, and/or DSA requirements. As described in Section 3.8(g), the City of Santa Monica Fire Department would review the proposed project plans to ensure that adequate emergency access is provided. The plans would

need to be adjusted in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. For these reasons, impacts to emergency access would be **less than significant**. No mitigation is required.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. Existing bicycle, transit, and pedestrian facilities within the vicinity of the project site are described in Appendix F1 and Appendix F2. Appendix F1 and Appendix F2 also include pedestrian counts at the study area intersections and the existing peak hour bicycle volumes. Construction activities associated with the proposed project may involve temporary, localized sidewalk and lane closures, which may potentially affect the flow and/or safety of pedestrian and/or bicycle traffic along the streets fronting the project site. In order to minimize potential effects to pedestrian and bicycle safety and to facilitate the flow of pedestrian and bicycle traffic, appropriate detour signage would be provided, and people would be safety routed around the sidewalk or lane closure. There are several bus stops within the vicinity of the project site, the nearest of which is along 17th Street, near its intersection with Pearl Street. This stop is located just south of the music building. While construction would occur within proximity to this transit stop, it is unlikely that it would interfere with the use or safety of this transit stop. In the event that an interruption in service is required at this stop, the transit service (Big Blue Bus) would be alerted and the District would coordinate with the transit service as appropriate. For these reasons, construction of the proposed project is not expected to adversely affect the safety or performance of pedestrian, bicycle, and transit facilities in the project area.

As stated in Section 2.3 and as explained in Section 3.16(a), the daily operations of the proposed project are not expected to increase traffic in the area, since no new students or faculty would result from the proposed project. As such, the performance and safety of the pedestrian, bicycle, and transit facilities would not be significantly affected by the project during daily operations. During special events, as explained in Section 3.16(a) and as described in Section 3.8(r), events at the new auditorium would result in periodic increases of pedestrian and vehicular activity in the project area. However, the project site is located in an urbanized area that is characterized by a high level of pedestrian and vehicular activity, due in part to the presence of the JAMS campus, the adjacent Santa Monica College and Will Rogers Learning Community Elementary School campuses, several churches, businesses, and residential neighborhoods in vicinity of the project site. Periodic events at the JAMS campus would not result in a substantial change in activity in the area relative to existing conditions such that the safety or performance of pedestrian, bicycle, and transit facilities would become compromised. Additionally, existing traffic control and safety measures are present throughout the project area. For example, the intersection of 16th Street and Pearl Street is controlled by an all-way stop, and pedestrian crossings at this intersection are striped. There are striped bicycle lanes in both directions along Pearl Street, a striped bicycle lane in the southbound direction along 17th Street, and a striped bicycle lane in

the northbound direction along 16th Street, with sharrow (or shared-lane) markings in the southbound direction. There are also traffic calming measures, such as speed bumps, along 16th Street. Additional measures such as traffic cones and crossing guards are used at the intersection of 16th Street and Pearl Street when necessary. Sidewalks are present along all three of the project site's street frontages and are separated from the vehicular travel lane by parking stalls or a landscaped parkway. These existing design features in the project area would continue to minimize hazards associated with pedestrians, bicycles, and vehicles traveling to, from, and around the project site. For these reasons, operation of the proposed project is not expected to adversely affect the safety or performance of pedestrian, bicycle, and transit facilities in the project area.

As described in Section 2.1, the District adheres to standards for environmental sustainability and green building that are established by CHPS. CHPS includes transportation criteria, such as locating a school near public transportation, providing bicycle racks and bicycle lanes, minimizing parking lots, and creating preferred parking for carpools. The proposed project would involve replacement of existing performing arts uses within an established school campus; as such, it would not involve changes to transit facilities, bicycle infrastructure, parking lots, or the school's proximity to such facilities. As noted above, the project site and the JAMS campus as whole are located within proximity to bicycle lanes and transit facilities. Additionally, JAMS provides bicycle parking at the school's entrance, which could be used by visitors, students, and staff who are using the performing arts facilities. The proposed project would not conflict with or interfere with the District's ability to implement criteria supporting alternative transportation.

The City of Santa Monica has established policies, plans, and programs to support the development and increased use of pedestrian, bicycle, and transit facilities in the project area. These policies, plans, and/or programs are generally described in the City's General Plan Land Use and Circulation Element. While the design of the project site is not subject to the City's General Plan, a general discussion of the City's policies for alternative modes of transportation and the project's consistency with those policies is provided here for informational purposes. Key goals set forth for alternative transportation include enabling everyone to walk comfortably everywhere in Santa Monica, providing a beautiful and attractive pedestrian environment throughout the City, creating a complete network of high-quality bicycle facilities, ensuring that the bicycle network is attractive to cyclists of all ages and experience levels, expanding high-quality regional rapid transit to improve connections between Santa Monica and the region, increasing transit ridership, and ensuring the financial stability of transit providers (City of Santa Monica 2015). The proposed project would involve replacement of performing arts buildings at an existing middle school campus. As such, the project would not directly involve the pedestrian, bicycle, and transit networks. However, as explained above, the proposed project would not result in adverse effects to the safety or performance of pedestrian, bicycle, or transit facilities. As such, the project would not interfere with the City's ability to work towards improving the safety, attractiveness, or use of its alternative transportation facilities. Furthermore, the existing JAMS campus, including the project site, can be accessed via pedestrian, bicycle, and transit facilities. (As described above, there are bicycle lanes and sidewalks along Pearl Street, 16th Street, and 17th Street. Additionally, there are

several transit stops that are within walking distance of the campus.) As such, while the proposed project itself would not develop or improve alternative transportation facilities, the project site would be accessible via a variety of alternative transportation modes, thereby supporting the use of such facilities for students and community members who are accessing the performing arts center. For these reasons, impacts related to the safety and performance of alternative transportation modes, as well as impacts related to conflicts with adopted policies for these transportation modes, would be **less than significant**. No mitigation is required.

References

City of Santa Monica. 2015. Santa Monica Land Use and Circulation Element. Adopted July 6, 2010. Revised July 24, 2015. Accessed January 3, 2018. https://www.smgov.net/Departments/PCD/Plans/General-Plan/.

SOURCE: Transpo Group, 2018

FIGURE 3.16-1

Study Area Intersections - Construction Analysis

John Adams Middle School Auditorium Replacement Project

DUDEK

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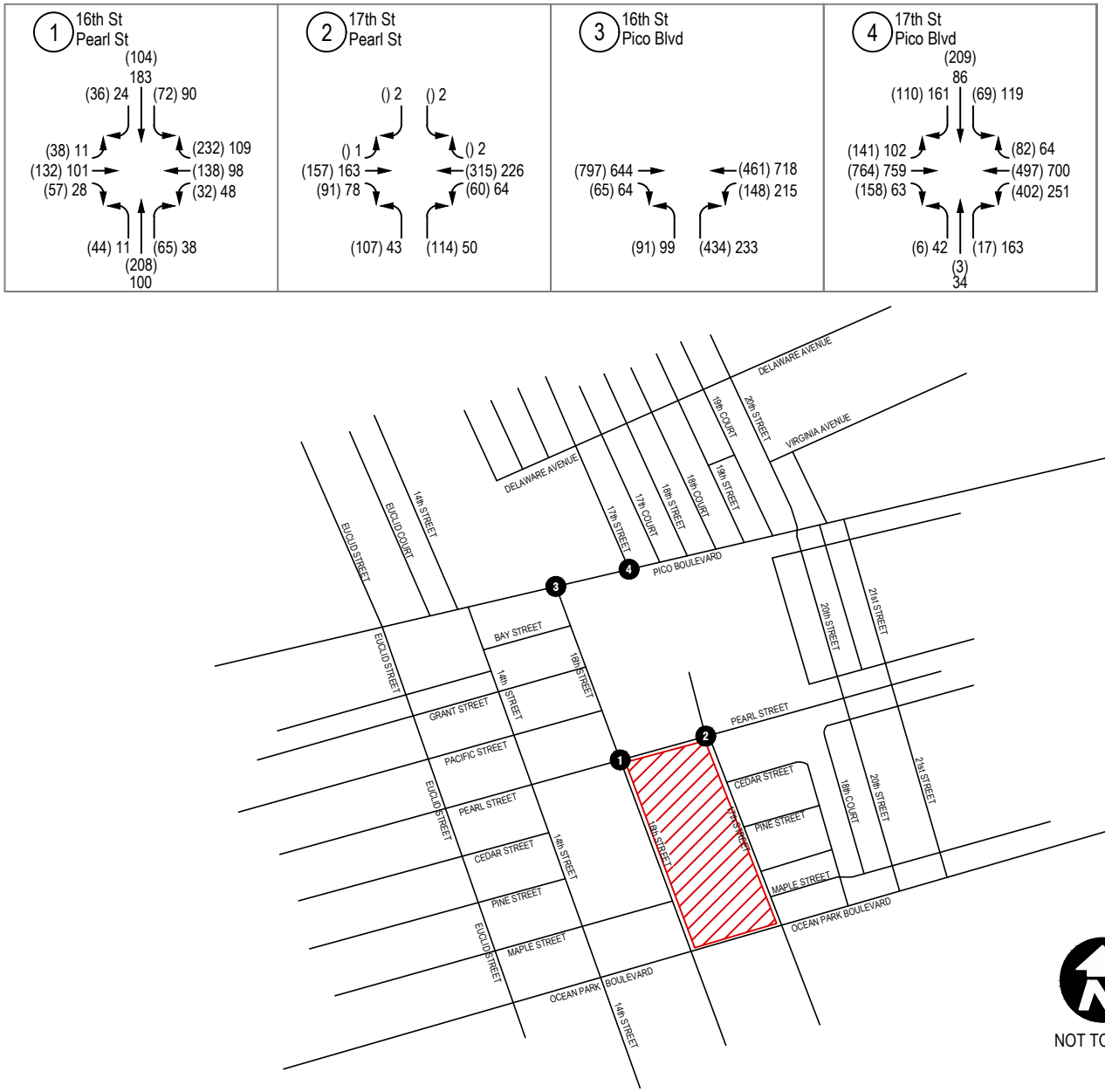

SOURCE: Transpo Group, 2018

FIGURE 3.16-2

Existing Conditions without Construction - AM/PM Peak Hour Traffic Volumes

John Adams Middle School Auditorium Replacement Project

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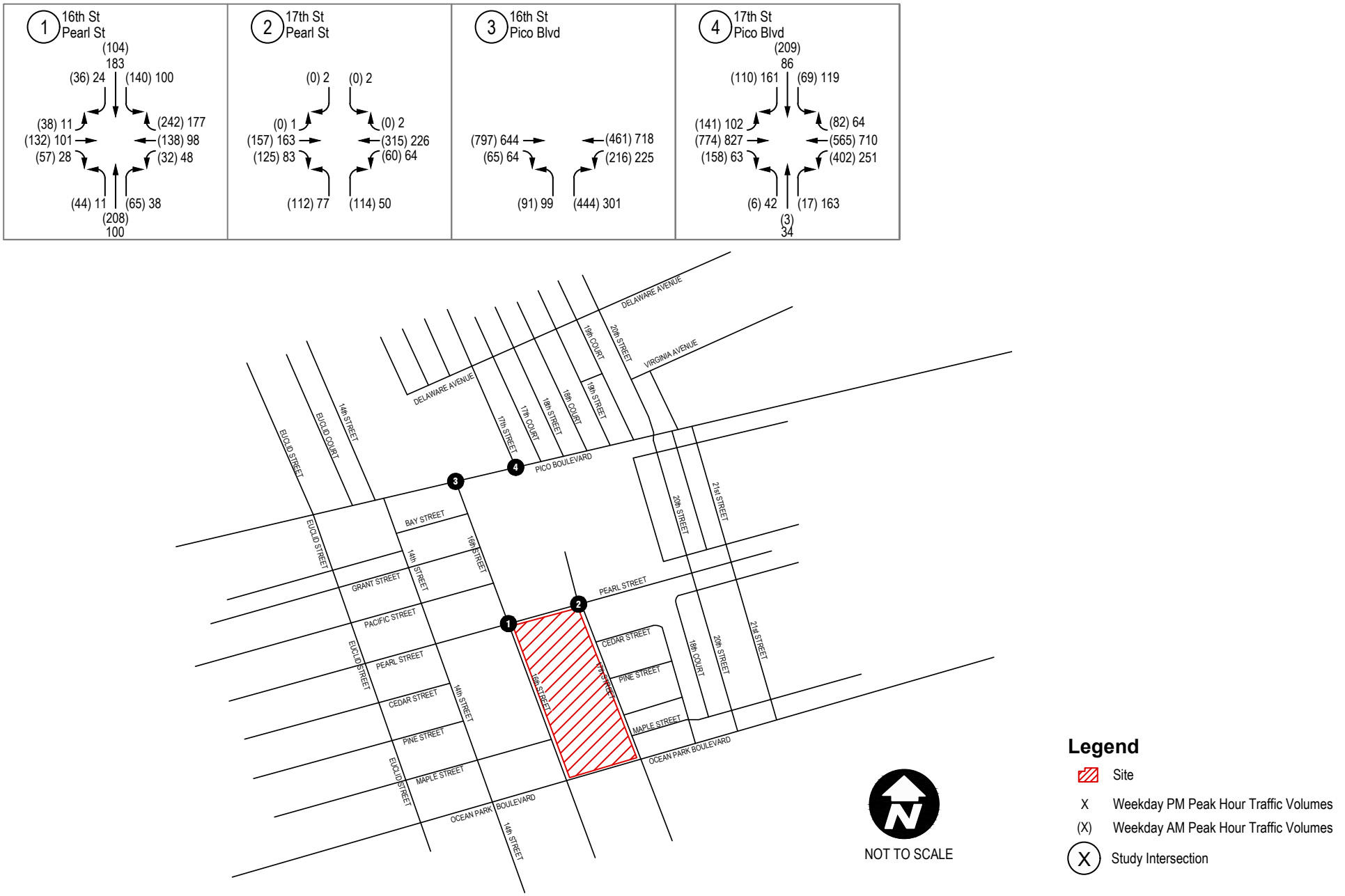

SOURCE: Transpo Group, 2018

FIGURE 3.16-3

Existing Conditions with Construction - AM/PM Peak Hour Traffic Volumes (in PCE)

John Adams Middle School Auditorium Replacement Project

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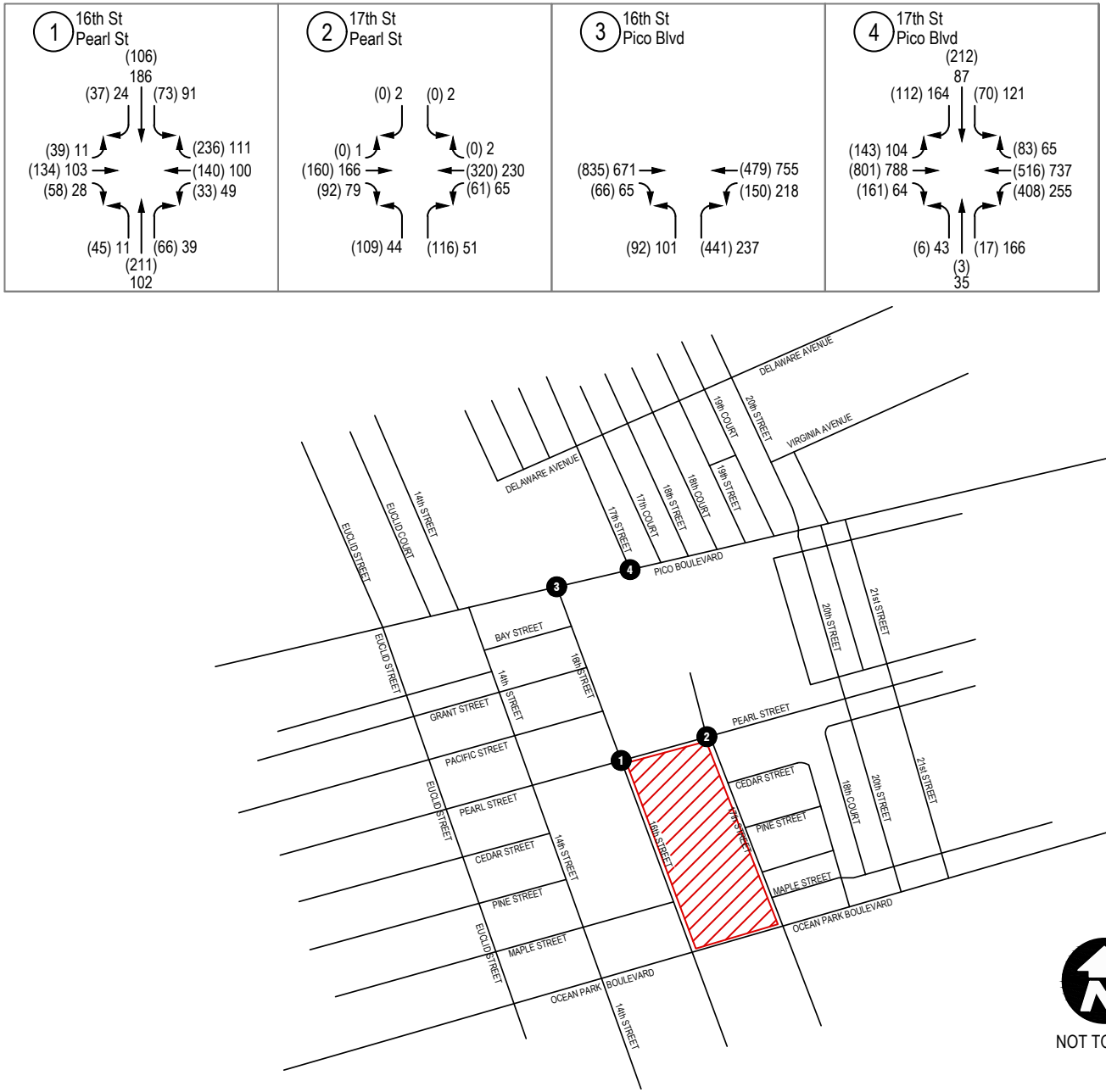

SOURCE: Transpo Group, 2018

FIGURE 3.16-4

2019 without Construction - AM/PM Peak Hour Traffic Volumes

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John Adams Middle School Auditorium Replacement Project

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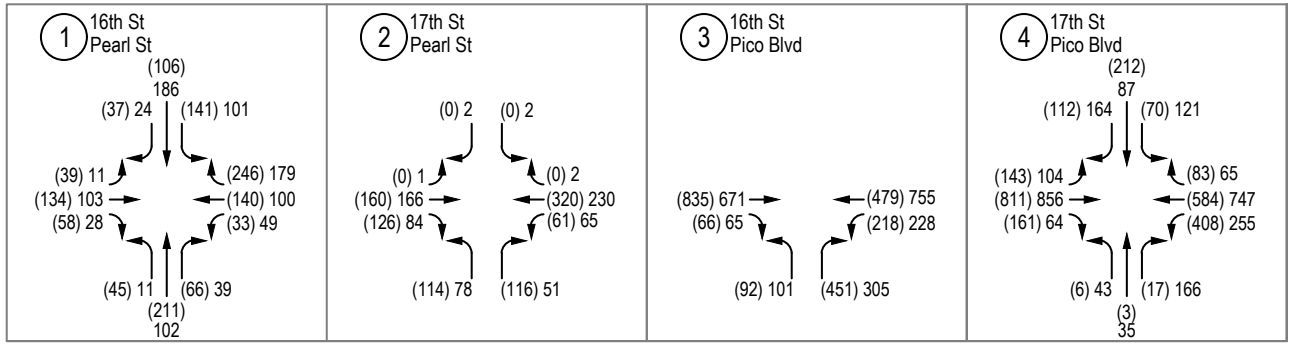

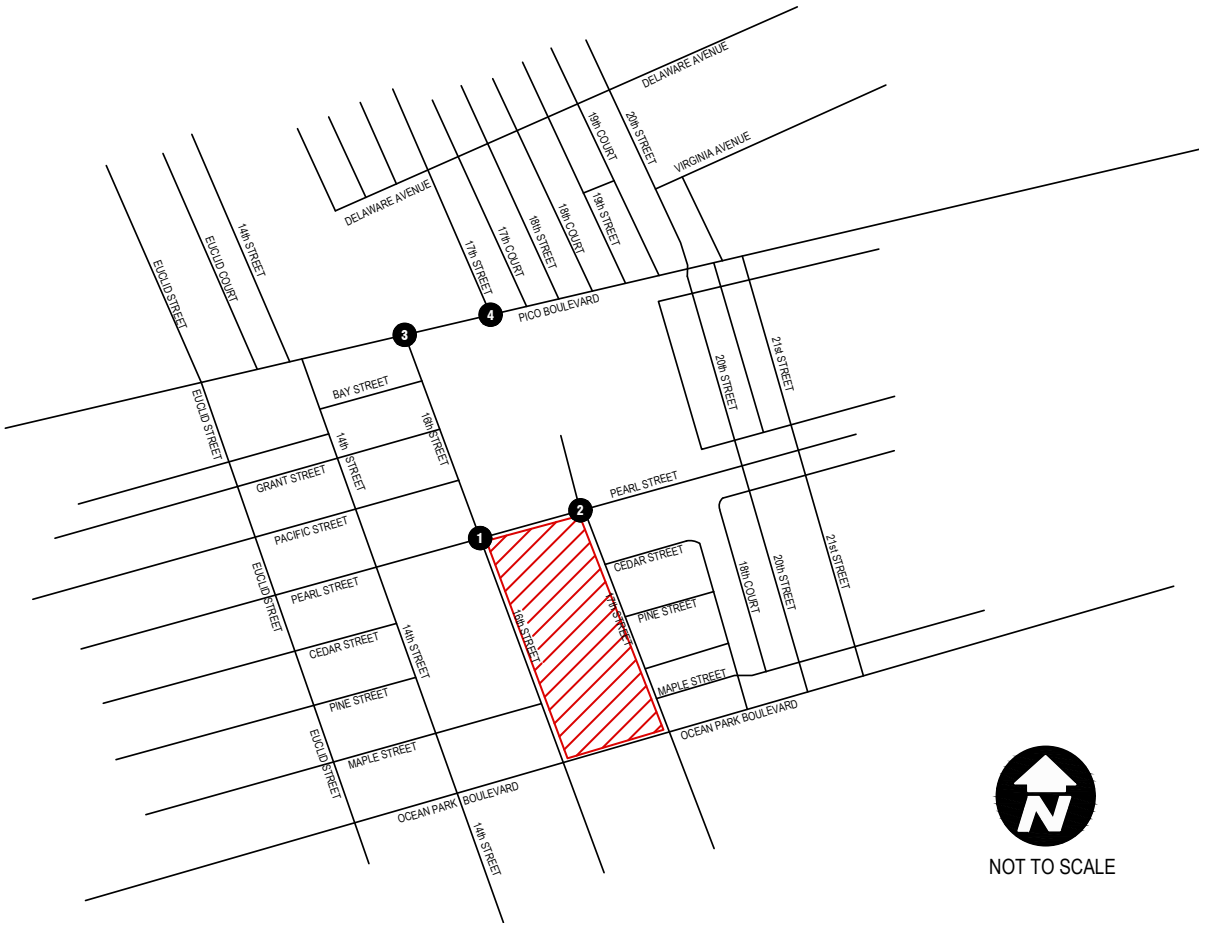

NOT TO SCALE

Legend

- Site
- X Weekday PM Peak Hour Traffic Volumes
- (X) Weekday AM Peak Hour Traffic Volumes
- X Study Intersection

SOURCE: Transpo Group, 2018

FIGURE 3.16-5

2019 with Construction - AM/PM Peak Hour Traffic Volumes (in PCE)

John Adams Middle School Auditorium Replacement Project

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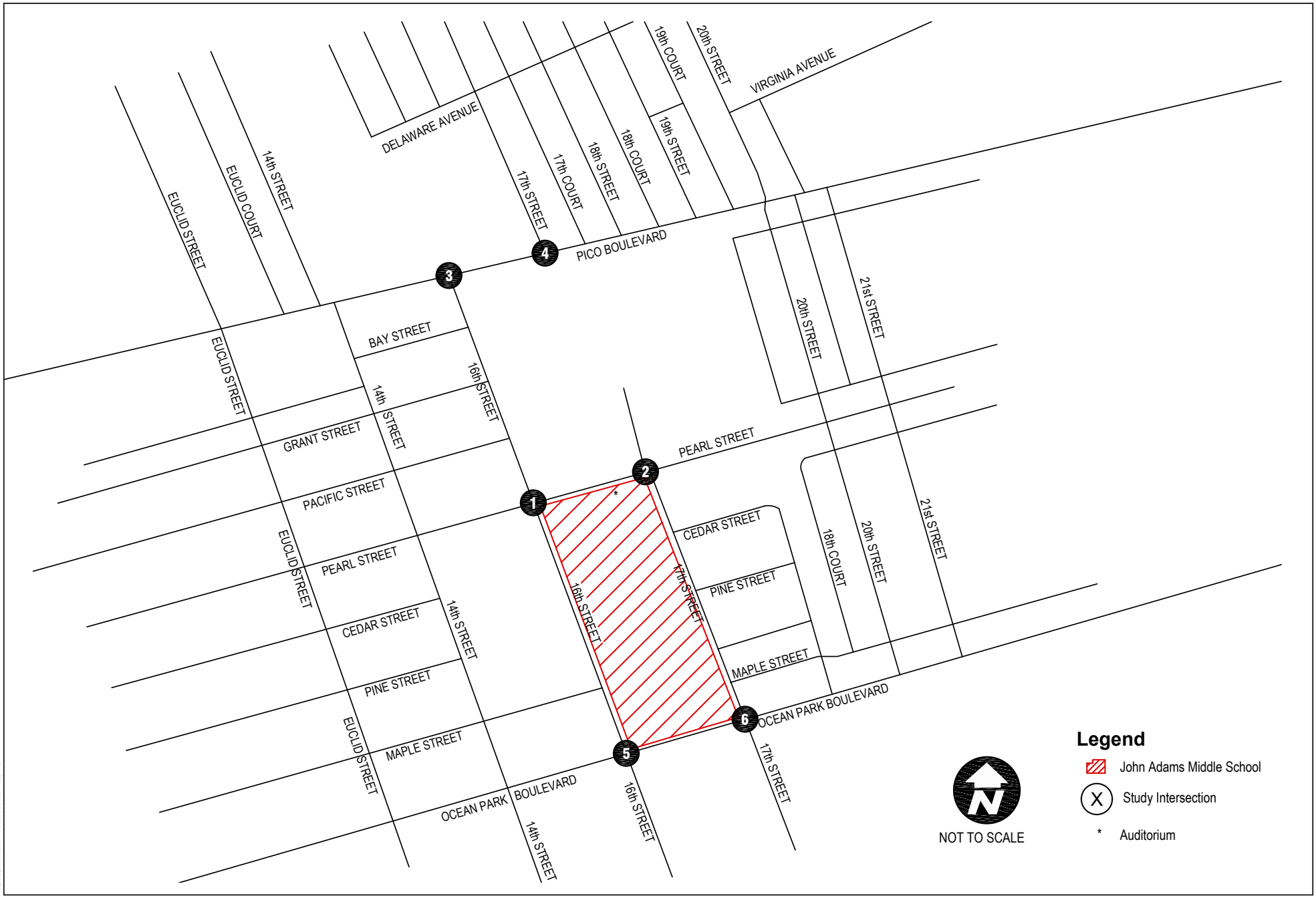

SOURCE: Transpo Group, 2018

DUDEK

FIGURE 3.16-6

Study Area Intersections - Operational Analysis

John Adams Middle School Auditorium Replacement Project

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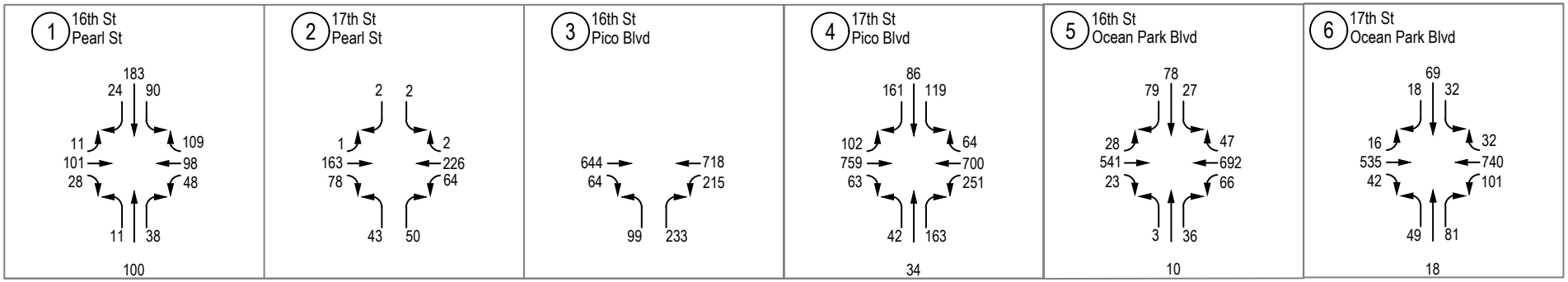

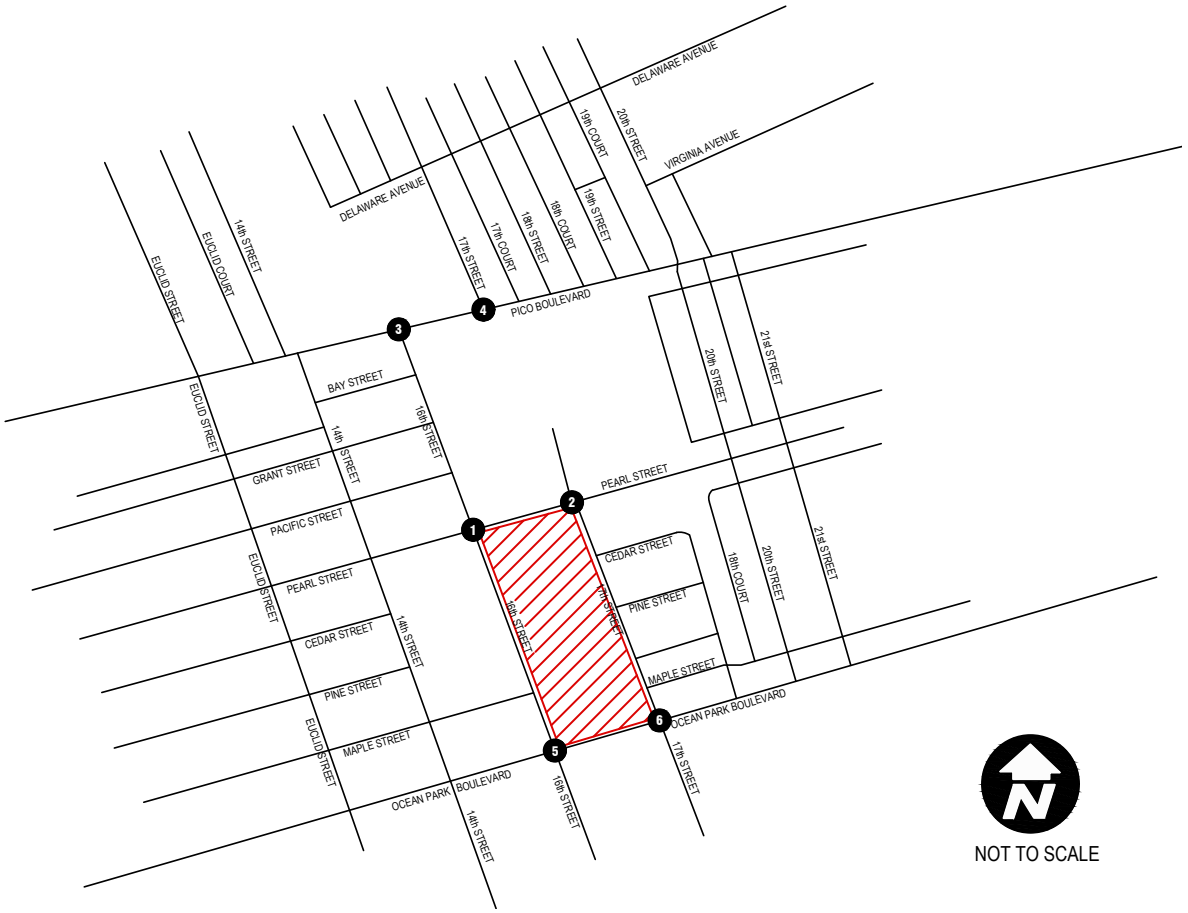

NOT TO SCALE

Legend

- Site
- X — Weekday PM Peak Hour Traffic Volumes
- (X) — Study Intersection

SOURCE: Transpo Group, 2018

FIGURE 3.16-7

Existing Conditions without Event Traffic - PM Peak Hour Traffic Volumes

John Adams Middle School Auditorium Replacement Project

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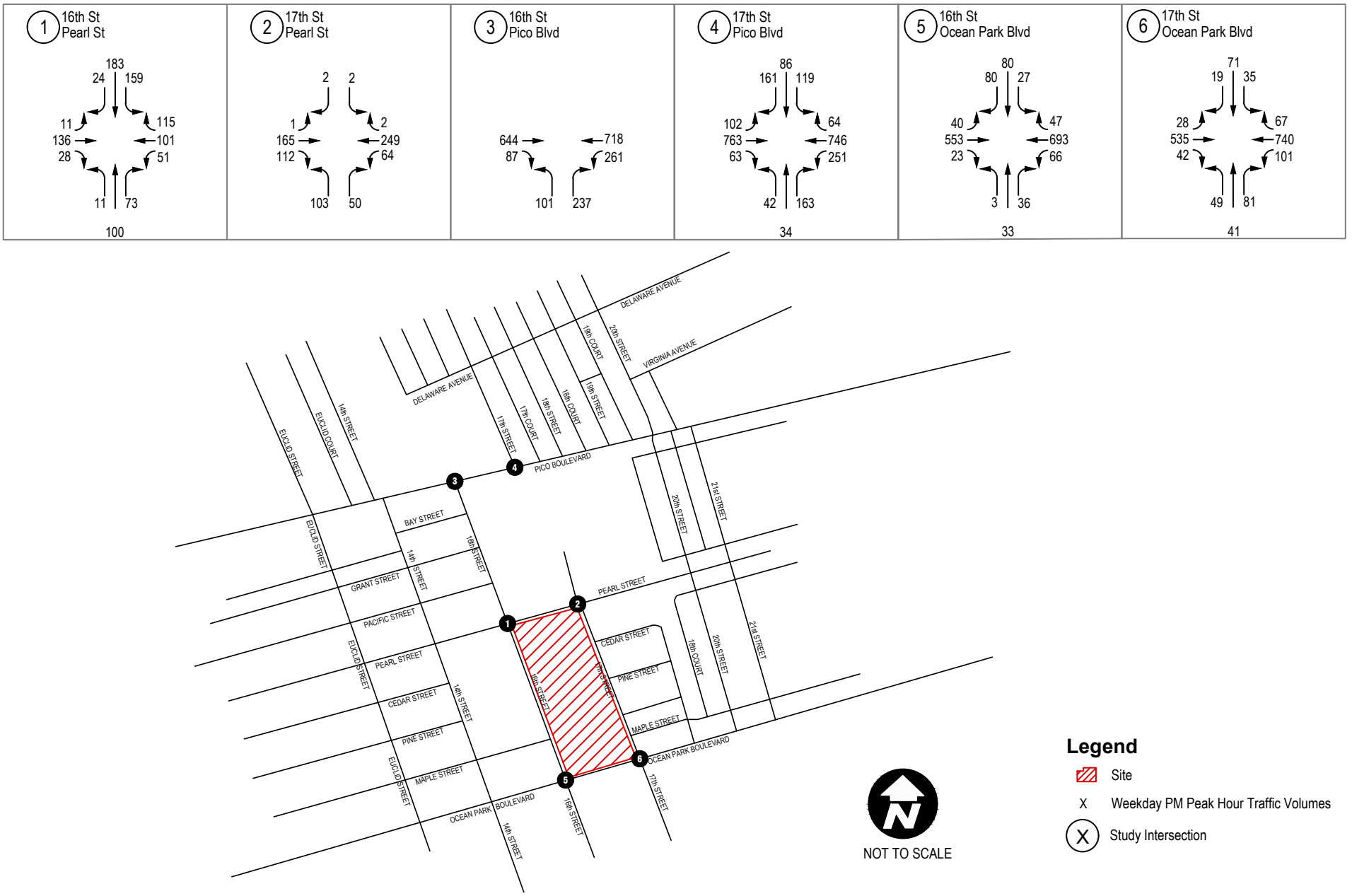

SOURCE: Transpo Group, 2018

FIGURE 3.16-8

Existing Conditions with Event Traffic - PM Peak Hour Traffic Volumes

John Adams Middle School Auditorium Replacement Project

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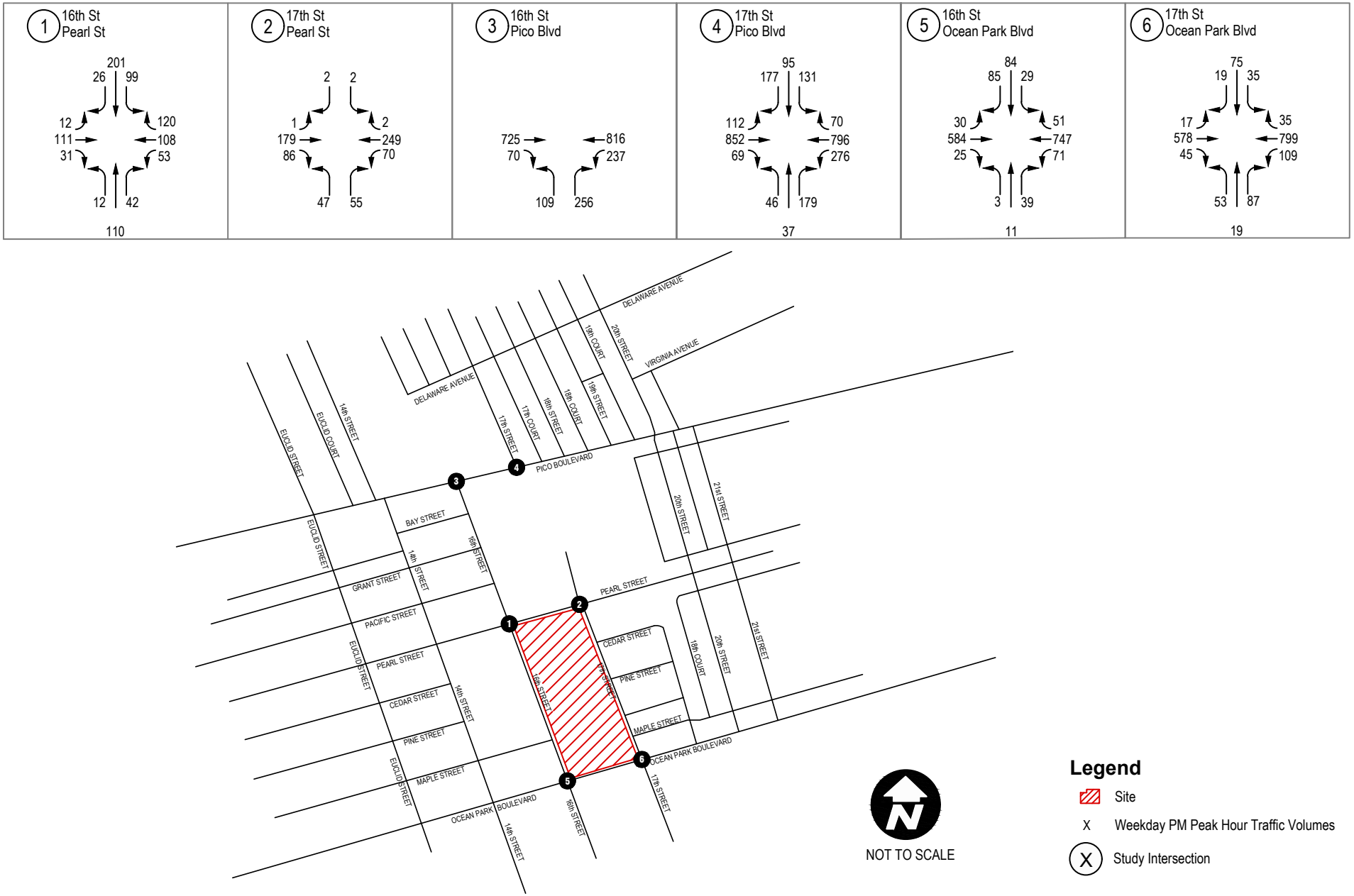

SOURCE: Transpo Group, 2018

FIGURE 3.16-9

2022 without Event Traffic - PM Peak Hour Traffic Volumes

John Adams Middle School Auditorium Replacement Project

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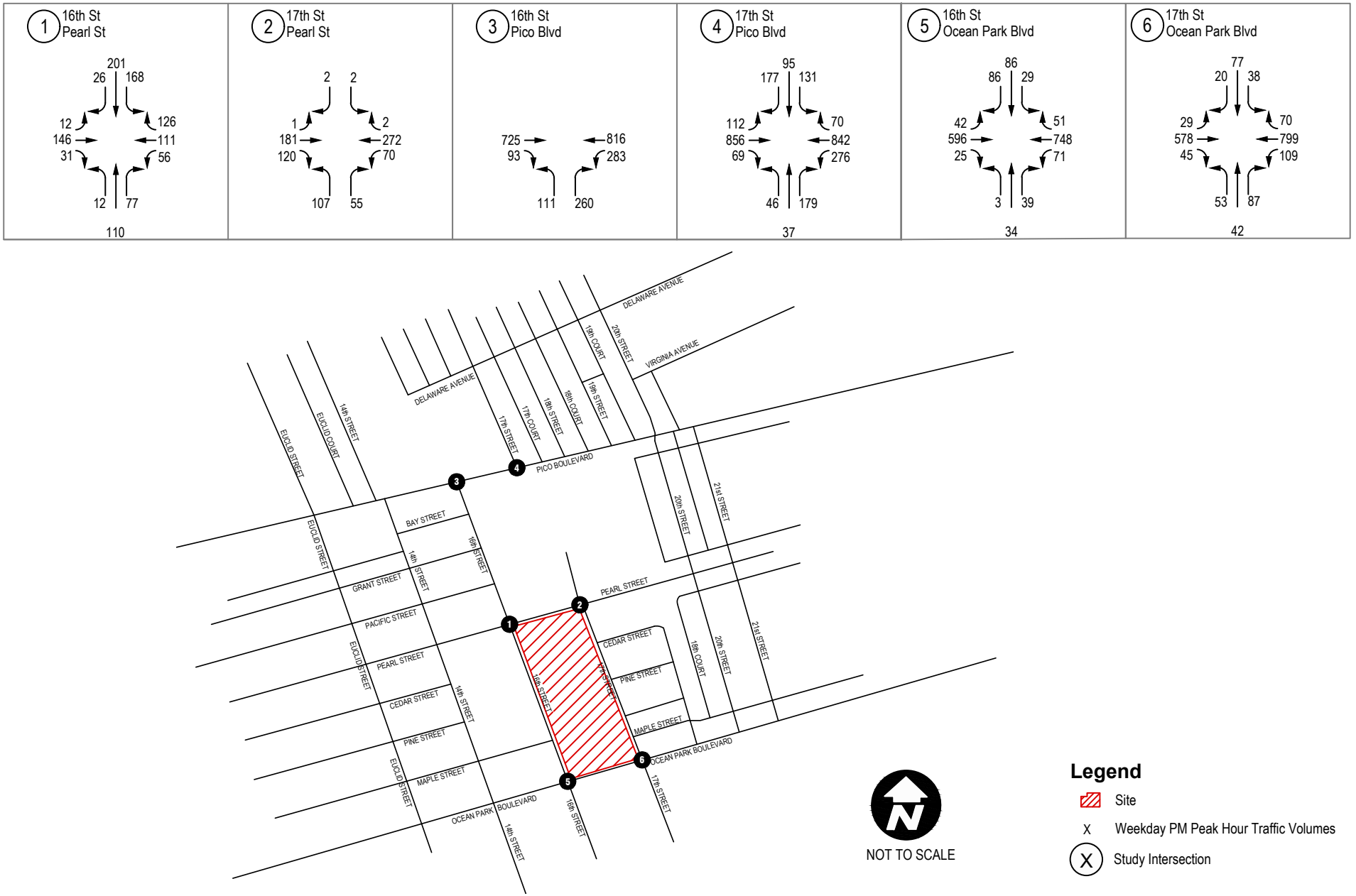

SOURCE: Transpo Group, 2018

FIGURE 3.16-10

2022 with Event Traffic - PM Peak Hour Traffic Volumes

John Adams Middle School Auditorium Replacement Project

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3.17 Tribal Cultural Resources

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

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact with Mitigation Incorporated. The proposed project is subject to compliance with Assembly Bill 52 (AB 52), which requires consideration of impacts to "tribal cultural resources" (TCRs) as defined in Public Resources Code 21074 as part of the CEQA process and requires the District to notify any groups (who have requested notification) of the proposed project who are traditionally or culturally affiliated with the geographic area of the project. One tribe (the Torres Martinez Desert Cahuilla Indians) requested formal notification of all projects within the Santa Monica-Malibu Unified School District jurisdiction on May 5, 2016. Accordingly, the District notified the Torres Martinez Desert Cahuilla Indians of the proposed project under AB 52 to provide an opportunity to consult on TCRs and other matters of concern. To date, no responses to the

notification letter have been received by the District. Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification are on file with the District.

As described under Section 3.5, a records search was conducted at the SCCIC for the project site. No tribal cultural resources were identified as a result of the records search. In a Sacred Lands File results letter dated February 8, 2018, the NAHC stated that the Sacred Lands File search was completed with negative results. In addition, the NAHC included a list of tribes who should be contacted for additional information about cultural resources within or near the project site. In an effort to proactively reach out to tribes with a cultural affiliation to the project site, Dudek mailed letters to Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the project site on February 9, 2018. On February 16, 2018, Andrew Salas, Chairman of the Gabrieleno Band of Mission Indians – Kizh Nation responded via email. Mr. Salas stated that the project site is within the Tribe's Ancestral territory and may have potential for discoveries of our cultural resources. Mr. Salas requested that one of our Native Monitors be present during any and all ground disturbances. No specific mitigation measures were suggested.

No tribal cultural resources were identified as a result of the AB 52 notification process, as described above. Therefore, no listed or eligible tribal cultural resources appear to be present on the project site. However, as explained in Section 3.5(b), it is possible that intact and previously undiscovered prehistoric archaeological deposits are present at subsurface levels and could be uncovered during ground-disturbing activities. In the event that such deposits are previously unknown tribal cultural resources, significant effect may occur to that resource, if the resource is disturbed, destroyed, or otherwise improperly treated. As described in Section 3.5(b), mitigation measure **MM-CUL-3** is set forth to ensure that construction work stops in the event of an archaeological find during construction and that the significance of the find is evaluated and examined by a qualified archaeologist. As enumerated in mitigation measure **MM-CUL-3**, if the discovery proves significant under CEQA, additional evaluation may be required. Upon implementation of mitigation measure **MM-CUL-3**, any previously undiscovered cultural resources at the project would be evaluated and protected as dictated by CEQA and other relevant laws protecting cultural resources. As such, impacts to tribal cultural resources would be **less than significant with mitigation incorporated**. No further mitigation is required.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)

Less Than Significant Impact with Mitigation Incorporated. There are no resources at the project site that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, as described in Section 3.17(a)(i), there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities. In the event that such resources are determined to be significant under Public Resources Code Section 5024.1, the project could result in significant impacts to such resources, if the resource is disturbed, destroyed, or otherwise improperly treated. As such, mitigation measure **MM-CUL-3** has been set forth to ensure that any archaeological finds that are exposed during construction activities for the proposed project are properly evaluated and protected as dictated by CEQA and other relevant laws protecting cultural resources. As such, impacts to tribal cultural resources would be **less than significant with mitigation incorporated**. No further mitigation is required.

References

None.

3.18 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. The City of Santa Monica operates a municipal sewer system and is subject to the wastewater treatment requirements adopted by the Los Angeles RWQCB, as well as various state and federal regulations. A significant impact would occur if the proposed project's discharge of wastewater exceeded the Los Angeles RWQCB's issued NPDES permits. Wastewater generated at the proposed project site would be treated at the Hyperion Water Reclamation Plant, which ultimately discharges into the Pacific Ocean. The Hyperion Water Reclamation Plant is required to comply with associated state-mandated Waste Discharge Requirements (WDRs). WDRs establish the levels of pollutants allowable in water discharged from a facility. Compliance with any applicable WDRs is monitored and enforced by the City of Los Angeles Sanitation, ensuring that treated effluent meets all federal, state, and local water quality standards. The water quality of sewage effluent from the project site after project implementation would be substantially similar to the existing conditions, since the project site's use would remain the same (i.e., performing arts uses).

The proposed project would result in an increase in the square footage of performing arts uses at the project site. However, as explained in Section 2.3, the increase in square footage is being proposed to accommodate the existing needs of the campus, and the proposed project would not result in an increase of student enrollment or faculty. As such, daily wastewater generation at the JAMS campus is not anticipated to substantially change as a result of the project. As explained in Section 3.9(b), the re-opening of auditorium uses on the project site and the increase in events that would be held at the auditorium upon project implementation may result in minor increases in water use, associated with restroom operation. As such,

wastewater generation may slightly increase upon project implementation. However, such increases would be temporary and intermittent, as they would be associated with events that are periodically held at the JAMS auditorium. In the context of the total water use of the JAMS campus and of the City as a whole, restroom use associated with the events held at the auditorium would not substantially change wastewater generation at the site such that wastewater treatment requirements are exceeded. For these reasons, neither the volume nor the water quality of wastewater generated at the project site is expected to substantially change as a result of the proposed project. As such, the proposed project would not exceed the wastewater treatment requirements of the Los Angeles RWQCB, and impacts would be **less than significant**. No mitigation is required.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. As described in Section 3.18(a) and in Section 3.9(b), any increases in water use and/or wastewater generation would be minor and would be associated primarily with the additional events that are proposed. As such, the increases would be periodic and intermittent and would be negligible in the context of the overall water use and wastewater generation of the JAMS campus and of the City as a whole. As such, the proposed project would not result in the need for new water or wastewater treatment facilities or the expansion of such facilities. There would be **no impact**. No mitigation is required.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As described in Section 3.9(a), stormwater runoff could increase during construction of the project, due to minor, localized changes in drainage patterns on the project site and due to the temporary absence of buildings, hardscape, and landscaping during grading. However, excessive runoff would be prevented through compliance with the required SWPPP, which would set forth best practices for stormwater management to be implemented during construction. During operation, the volumes and quality of runoff are expected to be similar to existing conditions, as described in Section 3.9(a). As such, the proposed project would not alter or increase stormwater runoff to the extent that new stormwater drainage facilities or the expansion of existing facilities would be required. Impacts would be **less than significant**, and no mitigation is required.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. As described in Section 3.9(b), the project would result in minor to negligible changes in the amount of water demand at the project site. Any increases in water demand would be associated primarily with the increase in special events that are proposed for the auditorium. Any such

increases in water use would be periodic and intermittent and would be negligible in the context of the overall water use at the JAMS campus and within the City as a whole. As such, new or expanded water entitlements would not be necessary for the proposed project. Impacts would be **less than significant**, and no mitigation is required.

e) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As described in Section 3.18(a), any increases in wastewater generation would be minor and would be associated primarily with additional visitors to the site resulting from the events that are proposed for the auditorium. As such, the increases would be periodic and intermittent and would be negligible in the context of the overall wastewater generation of the JAMS campus and of the City as a whole. As such, the proposed project would not result in an exceedance of the capacity of wastewater treatment facilities. Impacts would be **less than significant**, and no mitigation is required.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Construction of the proposed project would lead to a temporary increase in solid waste from the project site, due to demolition of the existing structures and the resulting need to dispose of the construction debris. However, this increase would be temporary and minor relative to the solid waste streams of the project area and relative to the capacities of landfills in the area. Operation of the proposed project would produce relatively similar amounts of solid waste as the existing site conditions, since the use of the site would remain the same. However, as with water demand and wastewater generation, the additional events that are proposed for the auditorium may result in increased solid waste production, due to the increase in visitors at the project site and associated disposal of trash. However, these increases would be minor and intermittent, since they would occur intermittently and would be associated with any waste that is disposed of by audience members during the relatively limited time that they are present at the site for an event. Any increased solid waste generation would be minor to negligible within the context of the overall waste stream caused by the daily use of the JAMS campus and the overall waste stream of the City. For these reasons, impacts related to solid waste would be **less than significant**. No mitigation is required.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The proposed project would be required to comply with regulations pertaining to solid waste. The proposed project would involve the replacement of existing performing arts buildings on an existing middle school campus; as such, the project does not present any land use changes or unique conditions that would preclude compliance with regulations governing solid waste. **No impacts** would occur due to inconsistencies with solid waste regulations.

References

None.

3.19 Mandatory Findings of Significance

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

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

Less Than Significant Impact with Mitigation Incorporated. The proposed project site is located in a developed and urbanized area and has been developed for over 50 years. The proposed improvements to the project site would not degrade the quality of the environment. As the project site has been developed for over

a half century and is surrounded by other development, it does not currently support substantial wildlife or fish habitat, fish or wildlife populations, or plant and wildlife communities. As described in Section 3.4, the project site may provide potential nesting sites for protected birds. However, mitigation measure **MM-BIO-1** has been set forth to ensure protection of nesting birds, in the event that any are found to be present on the site during construction activities. As discussed in Section 3.4, the project site is not anticipated to support any special-status plant or wildlife species.

As described in Section 3.5, the project site does not support any known examples of major periods in California history or prehistory. However, as stated in Section 3.5, the two existing buildings on the project site (the auditorium building and the music building) are part of a larger property (John Adams Middle School), which appears eligible for local listing as a historical resource. While the buildings on the project site are not historical resources, the buildings are adjacent to, and functionally related to, the larger John Adams Middle School campus. As such, demolition and construction activities at the project site could have a potentially significant impact on the core campus of buildings. However, potential impacts would be reduced below a level of significance with the implementation of **MM-CUL-1** and **MM-CUL-2**, which would provide for the necessary protection of the core campus buildings before and during construction-related activities and would ensure that documentation of the John Adams Middle School historic core campus is updated. Implementation of **MM-CUL-1** and **MM-CUL-2** would reduce potential impacts to the adjacent school buildings to a less-than-significant level. Additionally, in the event that sub-surface cultural resources were to be discovered during grading/construction activities, the resource would be preserved in accordance with mitigation measure **MM-CUL-3**. The proposed project would not, therefore, eliminate important examples of the major periods of California history. For these reasons, the proposed project would result in **less than significant impacts with mitigation incorporated** on sensitive species and important examples of California history. No further mitigation is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact with Mitigation Incorporated. Within the project area, there are a number of other development projects that have been proposed and/or approved. A list of these future potential projects can be found in Appendix F2, Table 8. These projects consist primarily of multi-family residential buildings. In the event that the environmental effects of the proposed project were to combine with the effects of these related, reasonably foreseeable projects, a cumulative impact could result. As explained in this MND, the proposed project would result in potentially significant project-level impacts involving air quality, biological resources, cultural resources, hazards and hazardous materials, noise and vibration, transportation and traffic, and tribal cultural resources. However, in all cases, mitigation measures have been identified that

would reduce these impacts to a less-than-significant level. After mitigation, the proposed project's impacts would be minimized to the extent feasible and are not anticipated to combine with the effects of related projects to create a cumulatively considerable impact. Furthermore, all reasonably foreseeable future development in the City would be subject to the same land use and environmental regulations that have been described throughout this document. The related development projects within the City are guided by the policies identified in the City's General Plan and by the regulations established in the City's Municipal Code. Compliance with these local regulations would minimize the combined effects of the related projects, thereby minimizing the potential for those effects to combine with the proposed project to produce a cumulatively considerable impact. Cumulative impacts would therefore be **less than significant with mitigation incorporated** for the proposed project. No further mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. The proposed project would not have an environmental effect that would cause significant adverse effects on human beings either directly or indirectly. Implementation of the mitigation measures identified in this MND would reduce any potentially significant environmental impacts that would cause adverse effects on human beings to a **less than significant level with mitigation incorporated** for air quality, cultural resources, hazards and hazardous materials, noise and vibration, transportation and traffic, and tribal cultural resources. No further mitigation is required.

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

Less Than Significant Impact with Mitigation Incorporated. The proposed project would not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. On the contrary, the proposed project would contribute to the long-term goals of the Santa Monica-Malibu Unified School District to account for increased enrollment with some short-term environmental impacts, which, with the mitigation measures identified above, would be reduced to a less-than-significant level.

The proposed project involves replacement of the current auditorium and the eventual construction of a new music building. The buildout of the proposed project could result in potentially significant impacts related to air quality, biological resources, cultural resources, hazards and hazardous materials, noise, transportation/traffic, and tribal cultural resources. However, with the implementation of the mitigation measures identified in this MND, impacts are considered **less than significant with mitigation incorporated**. No further mitigation is required.

References

None.

4 REPORT PREPARERS

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