Santa Monica College Art Complex Replacement Project

Draft Initial Study

Mitigated Negative Declaration

PREPARED FOR:
Santa Monica Community College District

PREPARED BY:
Parker Environmental Consultants, LLC

APPLICANT:
Santa Monica College

April 30, 2020

INITIAL STUDY CHECKLIST
MITIGATED NEGATIVE DECLARATION

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DRAFT IS/MND

Section 1. Introduction

Project Information

Project Title: Art Complex Replacement Project
Project Location: 1410 Pico Boulevard, 2019 and 2023 14th Street
Santa Monica, CA 90405

Project Applicant: Santa Monica College
1900 Pico Boulevard
Santa Monica, CA 90405

Lead Agency: Santa Monica Community College District
1900 Pico Boulevard
Santa Monica, California 90405

1.1 Purpose of an Initial Study

The California Environmental Quality Act (CEQA) was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the Lead Agency may adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND).

1.2. Organization of the Initial Study

This Initial Study is organized into six sections as follows:

SECTION 1. INTRODUCTION: This Section provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.

SECTION 2. EXECUTIVE SUMMARY: This Section provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

SECTION 3. PROJECT DESCRIPTION: This Section provides a description of the environmental setting and the Project, including project characteristics, related project information and a list of requested discretionary actions.

SECTION 4. EVALUATION OF ENVIRONMENTAL IMPACTS: This Section contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

SECTION 5. PREPARERS AND PERSONS CONSULTED: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the Initial Study.

SECTION 6. REFERENCES, ACRONYMS AND ABBREVIATIONS: This Section includes various documents and information used and referenced during the preparation of the Initial Study, along with a list of commonly used acronyms.

1.3. CEQA Process

In compliance with the State CEQA Guidelines, the Santa Monica Community College District (District), as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Proposed Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the District has prepared an Initial Study to identify the preliminary environmental impacts of the Project. The Initial Study determined that the Proposed Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein. Therefore, an MND is appropriate and EIR is not required.

DRAFT IS/MND

Section 2. Executive Summary

PROJECT TITLE	Santa Monica College Art Complex Replacement Project
PROJECT LOCATION	1410 Pico Boulevard, 2019 and 2023 14th Street, Santa Monica, CA 90405
DISTRICT	Santa Monica Community College District
COLLEGE / CENTER:	Santa Monica College
LEAD AGENCY	Santa Monica Community College District
STAFF CONTACT NAME AND ADDRESS	Charlie Yen 1900 Pico Boulevard Santa Monica, CA 90405
PHONE NUMBER	(310) 434-3002
APPLICANT NAME AND ADDRESS	Santa Monica Community College District 1900 Pico Boulevard Santa Monica, CA 90405
PHONE NUMBER	(310) 434-4000
GENERAL PLAN DESIGNATION	Neighborhood Commercial / Single-Unit Residential
ZONING	NC / R1

PROJECT DESCRIPTION: The Santa Monica Community College District ("SMC" or "Applicant") proposes to replace the existing Art Program Complex that is comprised of an assemblage of buildings that are located on the Main Campus and at a satellite location in a leased facility with a new facility that would consolidate the Art Program into one single building (Proposed Project). The Art Program is currently divided into two site locations, including the Art Complex Building on the Main Campus and a Ceramics Building at the satellite Airport Arts Campus south of the Santa Monica Airport. Due to its age, building systems, infrastructure, and limited space, the current Art Complex on the Main Campus no longer meets the needs of the Art Program and limits instructional delivery.

The Proposed Project would replace the existing Art Program Complex with a new building of approximately 20,720 assignable square feet (ASF) (31,877 gross square feet (GSF)) that would be located on the southeast corner of Pico Boulevard and 14th Street, bearing the street addresses of 1410 Pico Boulevard, and 2019 and 2023 14th Street. After construction of the Proposed Project is completed for occupancy, SMC would demolish the existing Art Complex building on the Main Campus. Once construction of the Proposed Project is completed for occupancy, the Ceramics Building at the satellite Airport Arts Campus, located south of the Santa Monica Airport, would be inactivated.

The Proposed Project would provide efficient and updated classrooms and laboratory spaces, as well as consolidate office spaces for faculty and staff. It would also improve accessibility, comply with ADA and building codes, and provide infrastructure to support modern arts technology and equipment. The Proposed Project would be approximately the same size as the combination of existing facilities that house the Arts Complex Program and would not result in any increase in total student enrollment.

The total lot area of the Project Site is approximately 71,860 gross square feet. The proposed square footage of the Proposed Project is 20,720 square feet with a gross building area of 31,877 square feet. For purposes of describing the Proposed Project's floor area, gross square feet (GSF) includes the sum of all areas on all floors of a building, including interstitial spaces (e.g. elevator shaft areas, mechanical storage rooms, and stairways) not meant to be occupied by people. Assigned square footage (ASF) includes the sum of all areas on all floors of a building capable of occupying people for a specific use. Floor area ratios (FAR) are calculated based on assigned square feet, therefore, the FAR of the Proposed Project would be 0.29:1.

ENVIRONMENTAL SETTING: The Project Site consists of three parcels and is located at 1410 Pico Boulevard, and 2019 and 2023 14th Street, Santa Monica CA 90405. These three contiguous parcels with Assessor Parcel Numbers (APN) 4284-034-900, 4284-034-004, and 4284-034-014 encompass approximately 71,860 gross square feet of total lot area (1.65 acres). The property located at 1410 Pico Boulevard is currently designated as a staff parking lot (Parking Lot 6) for the Main Campus located one street east of the Project Site. The other two contiguous parcels are located just south of Parking Lot 6 at 2019 and 2023 14th Street. Both parcels are currently vacant, undeveloped land. Surrounding properties are developed and include the SMC Office of Campus and Alumni Relations, the SMC Foundation, single-family residential housing, low-density multi-family residential, the Palm Motel, a Chevron corner gas station, and the Santa Monica Woodlawn Cemetery, Mausoleum, and Mortuary.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (to be completed by Lead Agency) On the basis of this initial evaluation:

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

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

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

☐ I find 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 earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Charlie Yen	Director of Facilities Planning
PRINTED NAME	TITLE
	4-30-2020
SIGNATURE	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 that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "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 Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must 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 sources 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 whichever 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.

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Section 3. Project Description

3.1 Project Summary

The Proposed Project would replace the existing Art Program Complex with a new facility that would consolidate the Art Program into one single building at a new location. The Art Program is currently divided into two site locations, including the Art Complex on SMC's Main Campus and a Ceramics Building at the satellite Airport Arts Campus south of the Santa Monica Airport. The total enrollment figures for the Spring and Fall Art Programs of 2019 were 1,848 and 2,310 full time equivalent students, respectively. Due to its age, building systems, infrastructure, and limited space, the current Art Complex on the Main Campus no longer meets the needs of the Art Program and limits instructional delivery. The Proposed Project would replace the on-campus Art Complex and satellite Ceramics Building with a new building with approximately 20,720 assignable square feet (ASF) (31,877 gross square feet (GSF)) located on the southeast corner of Pico Boulevard and 14th Street. After construction of the Proposed Project is completed for occupancy, SMC would demolish the existing Art Complex building on campus, and the Ceramic Building at the satellite Airport Arts Campus located south of the Santa Monica Airport would be inactivated. The Proposed Project would provide efficient and updated classrooms and laboratory spaces, as well as consolidated office spaces for faculty and staff, and it would improve accessibility, ensure compliance with ADA and building codes, and update infrastructure to support modern technology and equipment. The Proposed Project is approximately the same size in total assignable square feet as the existing on- and off-site facilities that support the current Art Program. As such, no increase in student enrollment is anticipated.

The Project Site consists of three parcels and is located at 1410 Pico Boulevard and 2019 and 2023 14th Street, Santa Monica CA 90405. Development within the City of Santa Monica is typically subject to the land use regulations of the City's General Plan and Zoning Ordinance. However, the Project Site is owned by the Santa Monica Community College District (District). The College, as part of the District, operates under the provisions of Section 53094 of the California Government Code, which provides that school districts may override the local zoning ordinance of a city or county, except for certain non-classroom facilities. As the Proposed Project would be a classroom-providing facility, it qualifies for exemption from the Santa Monica Zoning Ordinance, including height restrictions.

The Applicant is pursuing the following discretionary approvals: (1) adoption of the IS/MND and final project approval by the Santa Monica College Board of Trustees, the decision-making body of the District; (2) approval of an Amendment to the SMC Career and Educational Facilities Master Plan (2010 Update) to incorporate two parcels (APN 4284-034-014 and APN 4284-034-004) with a total lot area of approximately 1 acre for the proposed construction and operation of the SMC Art Complex Replacement Project consisting of approximately 31,877 gross square feet (GSF) of floor area; and (3) such other approvals, as may be necessary, in accordance with all applicable laws and regulations. The College will be required to submit the Proposed Project's building plans to the Division of State Architect (DSA) for structural safety, access compliance, and fire and life safety approvals.

3.2 Environmental Setting

3.2.1 Project Location

The Project Site is located adjacent to College-owned facility buildings, specifically the Santa Monica College Office of Campus and Alumni Relations and the Santa Monica College Foundation, both of which are located across the street from the College main campus. The Proposed Project would, therefore, be an extension of the main campus and consistent with the uses of adjacent parcels. The Project Site is also located on the border between the Pico Neighborhood and the Sunset Park Neighborhood of the City of Santa Monica (described further in Section 3.2.2 Existing Conditions). The Project Site's location within the City of Santa Monica and the greater Los Angeles region is depicted in Figure 3.1, Project Location Map, below. The Project Site encompasses three contiguous parcels and consists of approximately 71,860 gross square feet of total lot area (1.65 acres). The Project Site's property addresses, Assessor's Parcel Numbers (APN), land use, and lot area are summarized in Table 3.1, Summary of the Project Site, below.

Table 3.1
Summary of the Project Site

Address	APN	Existing Land Use	Lot Area (gross square feet)
1410 Pico Boulevard	4284-034-900	Parking Lot	71,860
2019 14th Street	4284-034-014	Vacant	
2023 14th Street	4284-034-004	Vacant	

Sources: City of Santa Monica, Department of Planning and Community Development, Santa Monica Interactive Zoning Map, website: https://www.arcgis.com/home/webmap/viewer.html?webmap=7a65c2c884b241938011c9c702ee697c&extent=-118.5249,33.9979,-118.4161,34.052, accessed January 2020.

Source: ESRI, ArcGIS, January 2020.

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Figure 3.1
Project Location Map

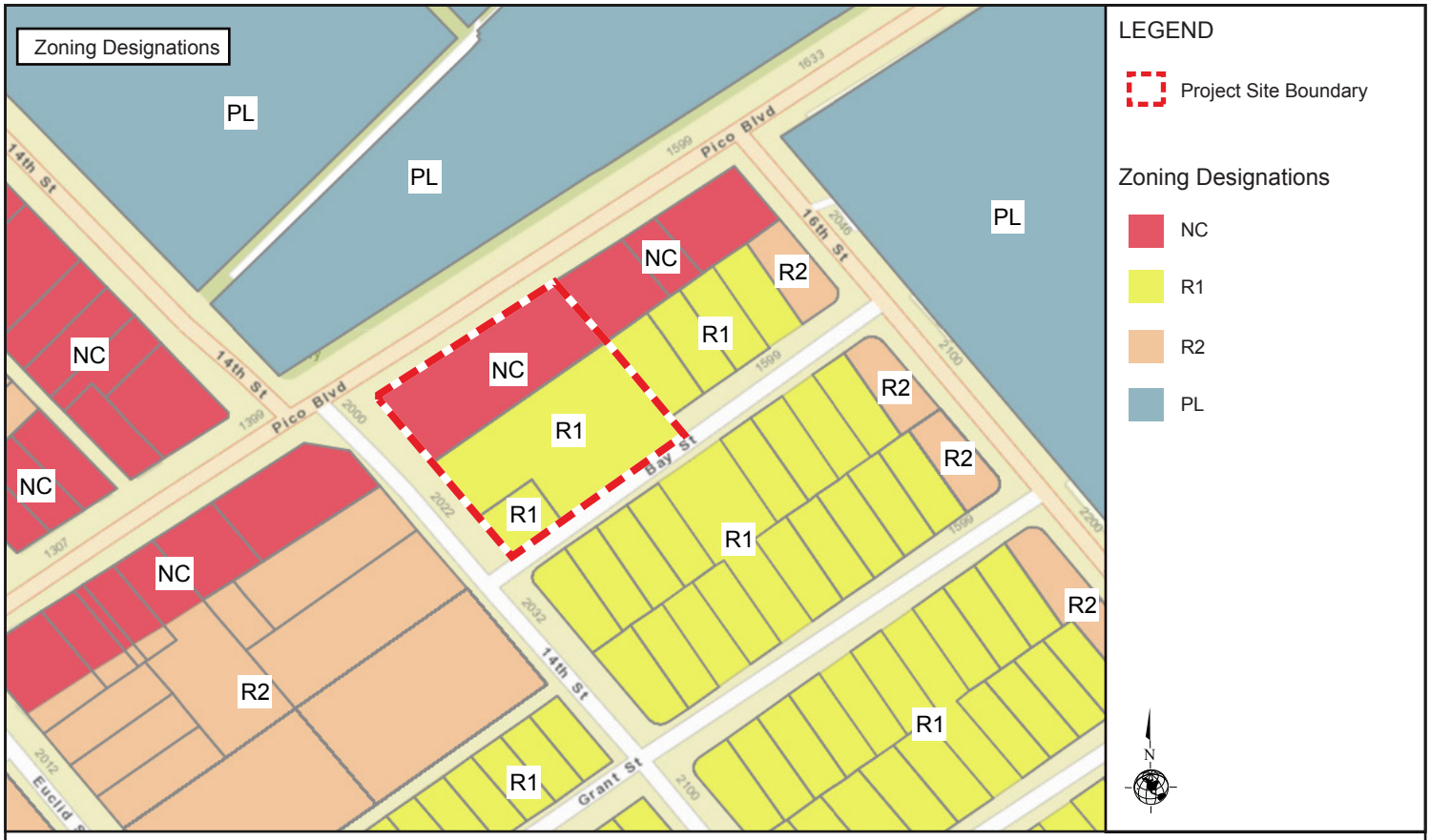
The Project Site is generally bound by Pico Boulevard to the north, College-affiliated buildings and single-family housing to the northeast and east, Bay Street to the south, and 14th Street to the west. Primary vehicular access to the Project Site is provided by the I-10 Freeway located approximately 0.34 miles northwest of the Project Site, as well as the Pacific Coast Highway (PCH or CA-1) located 0.5 miles southwest of the Project Site. Local street access is provided by the grid roadway system surrounding the Project Site. As stated in the Santa Monica Land Use and Circulation Element's (LUCE) Street Network Map, Pico Boulevard, which borders the Project Site to the north, is a two-way street providing two travel lanes in each direction. Pico Boulevard is an arterial roadway and classified as a Boulevard in the LUCE. 16th Street, the closest street to the east of the Project Site, is a two-way street providing one travel lane in each direction. 16th Street is classified as a Neighborhood Street in the LUCE. Bay Street, which borders the Project Site to the south, is not a through street (cul-de-sac) providing one travel lane in each direction. Bay Street is a residential street and is classified as a Neighborhood Street in the LUCE. 14th Street, which borders the Project Site to the west, is a two-way street providing one travel lane in each direction. The segment of Bay Street between 14th Street and 16th Street is only accessible by vehicle from 14th Street. 14th Street is classified as an Avenue Minor in the LUCE and provides one lane in each direction. North of the Project Site 14th Street has a bike lane in each direction, south of the Project site there is a bike lane in the southbound direction and a Class III bike facility in the northbound direction.

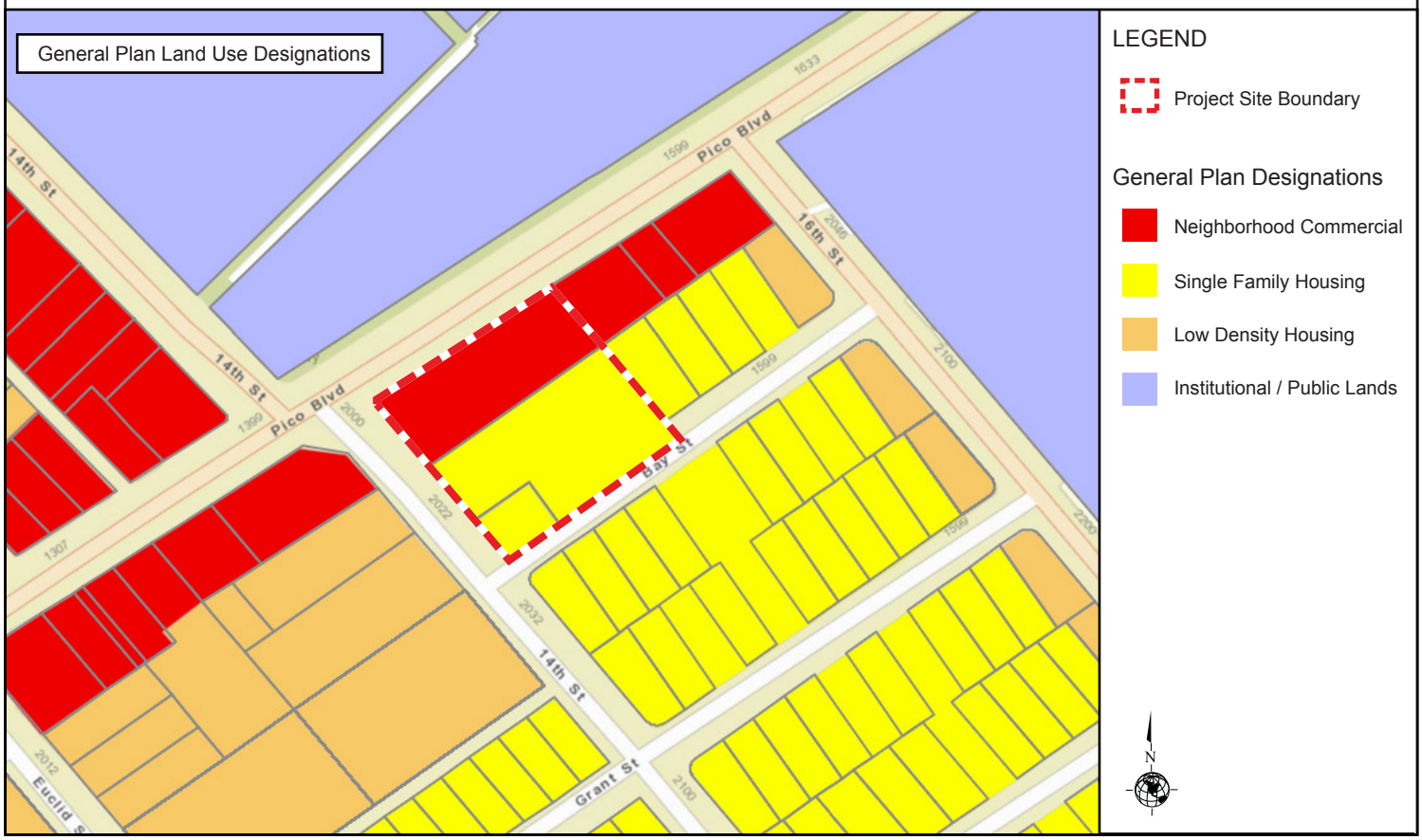
Santa Monica Big Blue Bus normally operates seven weekday routes, two of which also operate on the weekends, that have stops near the Main Campus. Transit lines that operate near the Project Site include Big Blue Bus Service (BBB) lines: 7, 7 Rapid, 16, 41/42, 43, 44; and the Metro Expo (E) Line. The Metro Expo (E) Line runs between Downtown Santa Monica and Downtown Los Angeles, with the 17th Street/SMC stop less than a fifteen-minute walk from campus at the intersection of 17th Street & Colorado Avenue.

3.2.2 Existing Conditions

a. Zoning and Land Use Designations

Figure 3.2, Zoning and General Plan Designations, shows the existing and proposed zoning and land use designations on the Project Site and in the surrounding area. The zoning designation for the Project Site is R1 (Single-Unit Residential) with a General Plan land use designation of Single Family Housing, fronting Bay Street, and zoned NC (Neighborhood Commercial) with a General Plan land use designation of Neighborhood Commercial, fronting Pico Boulevard. As stated previously, SMC, as part of the District,





Source: ArcGIS Santa Monica Zoning, City of Santa Monica, Department of Planing and Community Development, 2020.

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Figure 3.2
Zoning and General Plan Land Use Designations

operates independently from the City of Santa Monica regarding zoning, specifically under the provisions of Section 53094 of the California Government Code, which provides that school districts may override the local zoning ordinance of a city or county, except for certain non-classroom facilities. As the Project is proposed as a classroom-providing facility, it qualifies for exemption from the Santa Monica Zoning Ordinance, including height and setback restrictions. The total lot area of the Project Site is 71,860 gross square feet. The Proposed Project would include approximately 20,720 square feet of area resulting in a FAR of 0.29:1 (20,720 sf / 71,860 sf)

In the LUCE, specifically Chapter 2.4, entitled "Santa Monica's Boulevards," Pico Boulevard is depicted in segments with specific goals and future expectations of how the corridor will develop now and in the future. For the specific segment of Pico Boulevard, between 16th Street and Lincoln Boulevard, which includes a section of the Project Site (1410 Pico Boulevard), the City envisions more convenient pedestrian and bicycle connections to the College to the east and Lincoln Boulevard to the west and encourages development that strengthens the residential neighborhood character.

b. Sunset Park Neighborhood

Within the LUCE in Chapter 2.2, entitled "Neighborhood Conservation," Santa Monica's neighborhoods are divided into sections. The Project Site is specifically located within the Sunset Park Neighborhood on the border adjacent to the Pico Neighborhood. The Sunset Park Neighborhood is characterized by orderly, single-family homes, a limited number of multi-family buildings, elementary schools, neighborhood-serving restaurants, and two grocery stores. The Pico Neighborhood is characterized by an ethnically diverse resident base of both single-family and multi-family development as well as home to the College main campus. The Project Site is located adjacent to College-affiliated properties that are located across the street from the main campus, specifically the Santa Monica College Campus and Alumni Relations building and the Santa Monica College Foundation building. In addition, the Project Site is located along the Pico Boulevard commercial corridor, which is considered in the LUCE as an important connection between West Los Angeles, Santa Monica College, Downtown Santa Monica, and the Pacific Ocean, and it is characterized by neighborhood-serving commercial uses.

a. Existing Site Conditions

Figure 3.3, Aerial Photograph of the Project Site and Surrounding Land Uses shows an aerial view of the Project Site and identifies where Site photographs were taken. Figure 3.4, Photographs of the Project Site and Figure 3.5 Photographs of the Surrounding Land Uses show the different types of land uses and photographs taken while on-site.

LEGEND

- Project Site Boundary
- Surrounding Land Use Boundaries
- # Photograph Locations
- # Surrounding Land Uses:

1. Santa Monica Woodlawn Cemetery, Mausoleum, and Mortuary
2. Santa Monica College Campus and Alumni Relations
3. Santa Monica College Foundation
4. Single-family residential
5. Multi-family residential
6. Palm Motel
7. Chevron Gas Station
8. Joy Automotive Service & Repair

SCALE: APPROXIMATE

0 60' 120'

N

Source: Google Earth, Aerial View, 2020.

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Figure 3.3
Aerial Photograph of the Project Site and Surrounding Land Uses

The Proposed Project is currently in use as a College-affiliated surface parking lot and vacant land owned by the District. The previous buildings that had been located on-site before the District acquired them (and have been recently demolished) were the YWCA Cottage House, Shelter Home, Auditorium, and Recreation Center. There are currently 17 trees located on-site and 7 located in the public-right-of-way. The 17 trees located on-site are ornamental in nature, the majority of which were planted with shrubbery lengthwise along the fence to delineate the border between 1410 Pico Boulevard and 2019 14th Street. The remaining on-site trees not located at the border between 1410 Pico Boulevard and 2019 14th Street are interspersed in no particular arrangement around the Project Site boundaries. The seven trees located in the public right-of-way are located along Pico Boulevard and 14th Street. There are also Fig trees along Bay Street outside of the Project Site boundaries that provide shading for the surrounding single-family homes to the east, southeast, and south.

3.2.3 Surrounding Land Uses

As shown in Figure 3.2, the Project Site is zoned R1 and NC and properties immediately bordering the Project Site are zoned NC (Neighborhood Commercial) with a General Plan land use designation of Neighborhood Commercial, R1 (Single-Unit Residential) with a General Plan land use designation of Single Family Housing, and PL (Institutional/Public Lands) with a General Plan land use designation of Institutional/Public Lands. The properties surrounding the Project Site include a mix of single-family residential housing, College-affiliated buildings, low-density multi-family housing, and the Santa Monica Woodlawn Cemetery, Mausoleum, and Mortuary. Buildings range in height from one-story to two-stories above grade. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5 Photographs of the Surrounding Uses, Views 7-12. Below is a description of the existing conditions in the surrounding area:

North: Pico Boulevard borders the Project Site to the north. The Santa Monica Woodlawn Cemetery, Mausoleum, and Mortuary is located immediately north of Pico Boulevard and is zoned PL (Public Lands / Institutional). Refer to Figure 3.5, View 8.

East: 16th Street is the closest street to the east of the Project Site. Between 16th Street and the Project Site are College-affiliated buildings, specifically the Santa Monica Campus and Alumni Relations building and the Santa Monica College Foundation building to the northeast, zoned Neighborhood Commercial (NC). Directly east of the Project Site are single-family homes zoned R1 (Single-Unit Residential) with a General Plan land use designation of Single Family Housing. Refer to Figure 3.5, Views 7 and 11, respectively.

South: Bay Street immediately borders the Project Site to the south. Single-family residential housing is located along Bay Street directly across from the Project Site to the south. Refer to Figure 3.5, View 12.

West: 14th Street immediately borders the Project Site to the west. Multi-family apartments and the Palm Motel are located along 14th Street directly across from the Project Site to the southwest. A Chevron gas station is located at the street corner of 14th Street and Pico Boulevard, northwest of the Project Site. Refer to Figure 3.5, Views 9 and 10.

View 1: On the western side of 14th Street, looking east at the Project Site.

View 2: On the northern side of Pico Boulevard, looking southeast at the Project Site.

View 3: On the northern side of Pico Boulevard, looking east at the Project Site.

View 4: On the southern side of Pico Boulevard, looking south at the Project Site.

View 5: On the western side of 14th Street, looking north at the Project Site.

View 6: In the center of Bay Street, looking west at the Project Site.

Source: Parker Environmental Consultants, January 29 and 31, 2020.

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Figure 3.4
Photographs of the Project Site
Views 1 - 6

View 7: On the northern side of Pico Boulevard looking southeast at the properties east of the Project Site.

View 8: On the southern side of Pico Boulevard looking northeast at the property north of the Project Site.

View 9: On the eastern side of 14th Street looking west at the properties west of the Project Site.

View 10: On the eastern side of 14th Street looking south at the properties south and southwest of the Project Site.

View 11: In the center of Bay Street looking northeast at the properties north of the Project Site.

View 12: In the center of Bay Street looking southwest at at properties south and southeast of the Project Site.

Source: Parker Environmental Consultants, January 29 and 31, 2020.

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Figure 3.5
Photographs of the Surrounding Land Uses
Views 7 - 12

3.3 Project Description

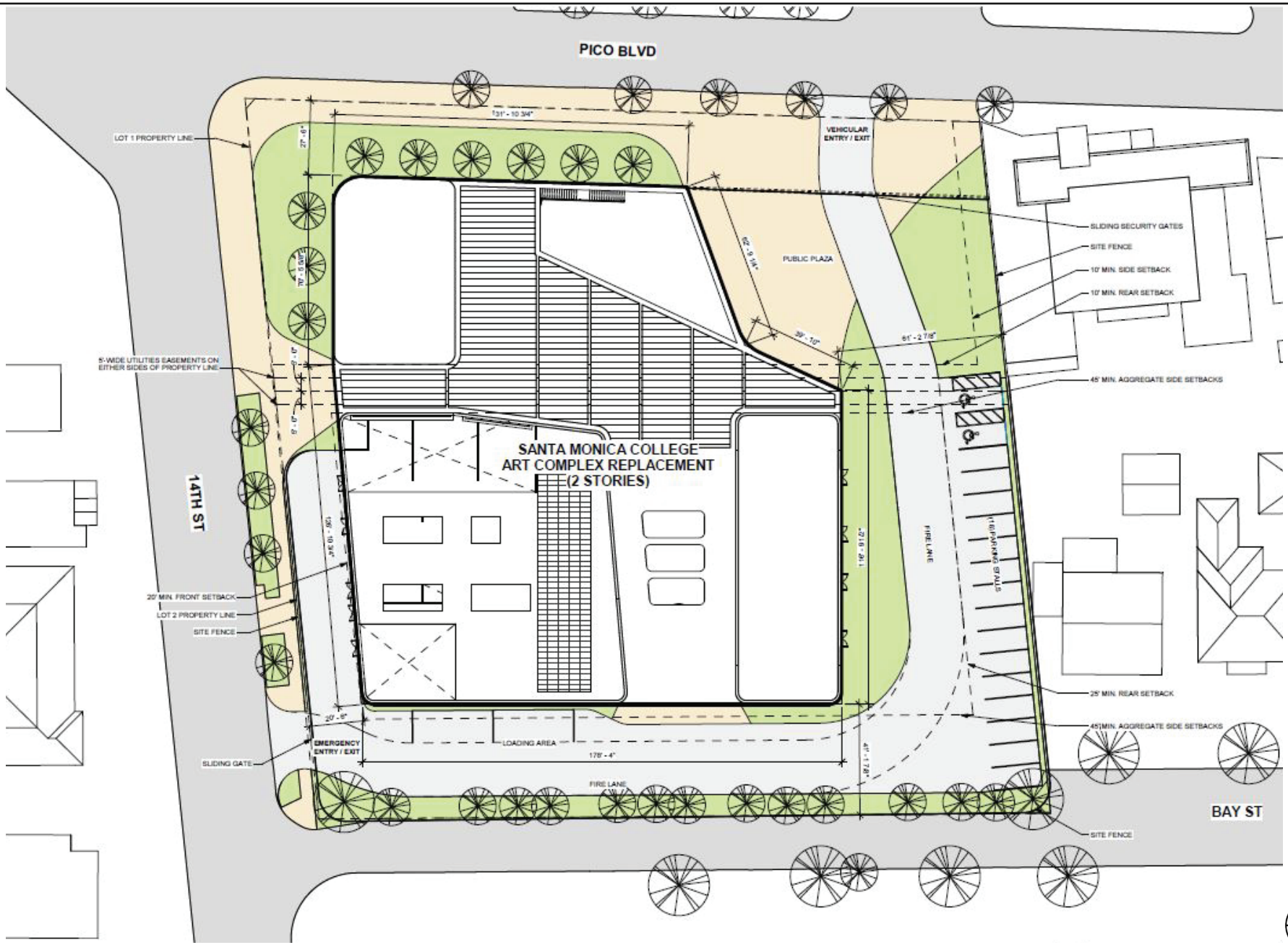
3.3.1 Project Overview

The Proposed Project would replace the existing Art Program Complex that is comprised of an assemblage of buildings that are located on the Main Campus and a single building that is located at a satellite location in a leased facility. The College's Art Program is currently dispersed between two SMC campuses. Due to the current Art Complex's age, building systems, infrastructure, and limited space, it no longer meets the needs of the College's Art Program. The Proposed Project would relocate the existing Art Program to a new location just west of the Main Campus, at 1410 Pico Boulevard and 2019 and 2023 14th Street. Specifically, the Proposed Project would provide a total gross building area of 31,877 square feet with 20,720 square footage of classrooms, laboratories, and office space. After construction of the Proposed Project is completed for occupancy, the College would demolish the existing Art Complex building on the Main Campus, and the Ceramics Building at the satellite Airport Arts Campus, located south of the Santa Monica Airport, would be inactivated. The Proposed Project would provide efficient and updated classrooms and laboratory spaces, as well as consolidated office spaces for faculty and staff, and it would improve accessibility, ensure compliance with ADA and building codes, and update infrastructure to support modern technology and equipment. A summary of the Proposed Project is provided in Table 3.2, Proposed Development Program, below. The Proposed Site is shown in Figure 3.6, Site Plan. Floor Plan layouts of the classroom spaces and program areas are shown in Figures 3.7 and 3.8, for the ground level and second level respectively.

Table 3.2
Proposed Development Program

Art Complex Replacement	Proposed Number
Floor Area	20,720 sf
Vehicle Parking	20 spaces
Height	2 stories
FAR	0.29:1

Note: The Proposed Project building would include a gross building area of 31,877 sf, which includes stairways, elevators, mechanical equipment, and storage. For purposes of calculating FAR, the "assigned floor area" of 20,720 sf is used to determine FAR, which includes occupiable areas, such as the classroom space, laboratory, and office spaces.
Source: Santa Monica College, 2020.



Source: Grimshaw Architects; Little Diversified Architectural Consulting, March 13, 2020.

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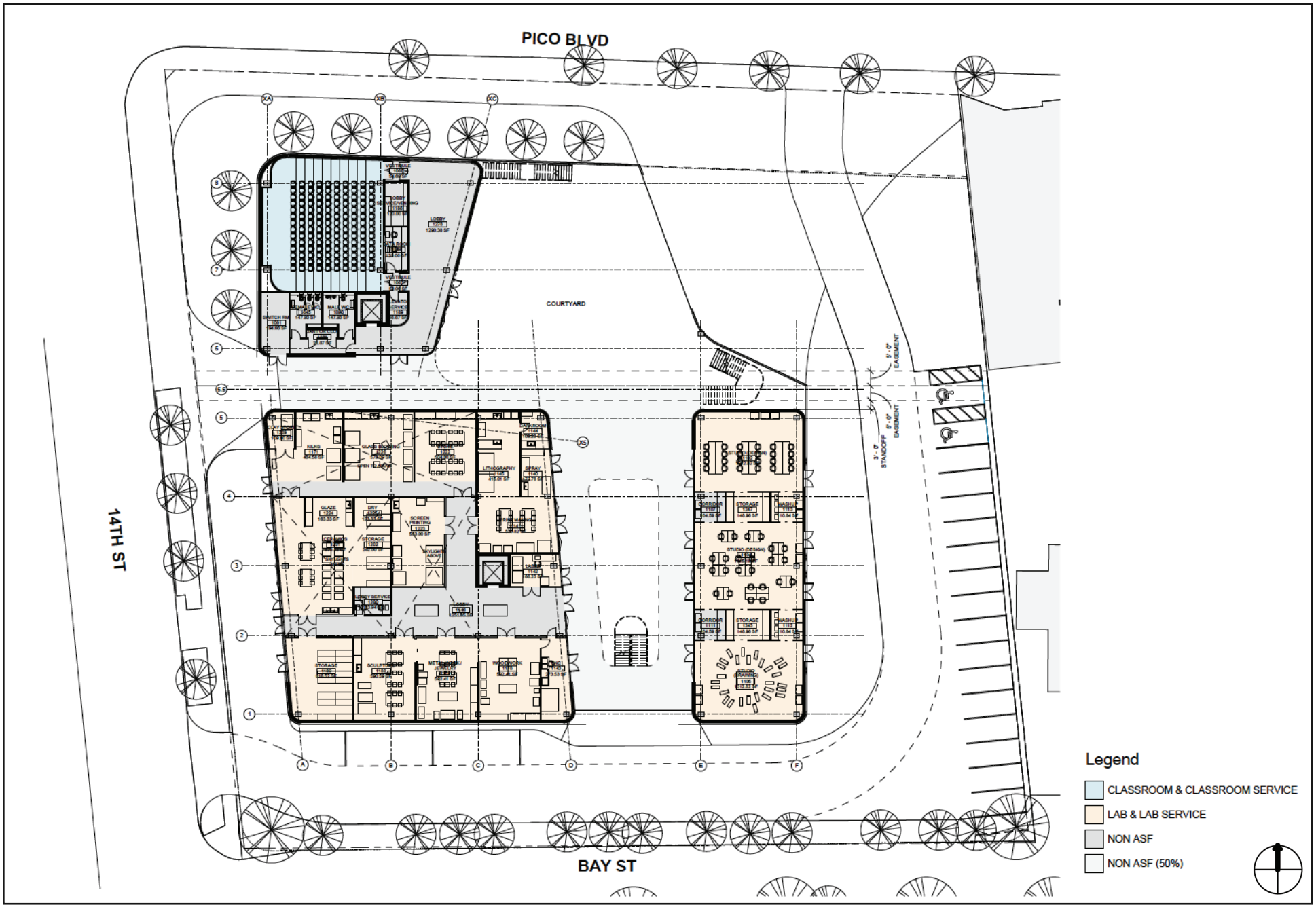
Figure 3.6
Site Plan



Source: Grimshaw Architects; Little Diversified Architectural Consulting, March 13, 2020.

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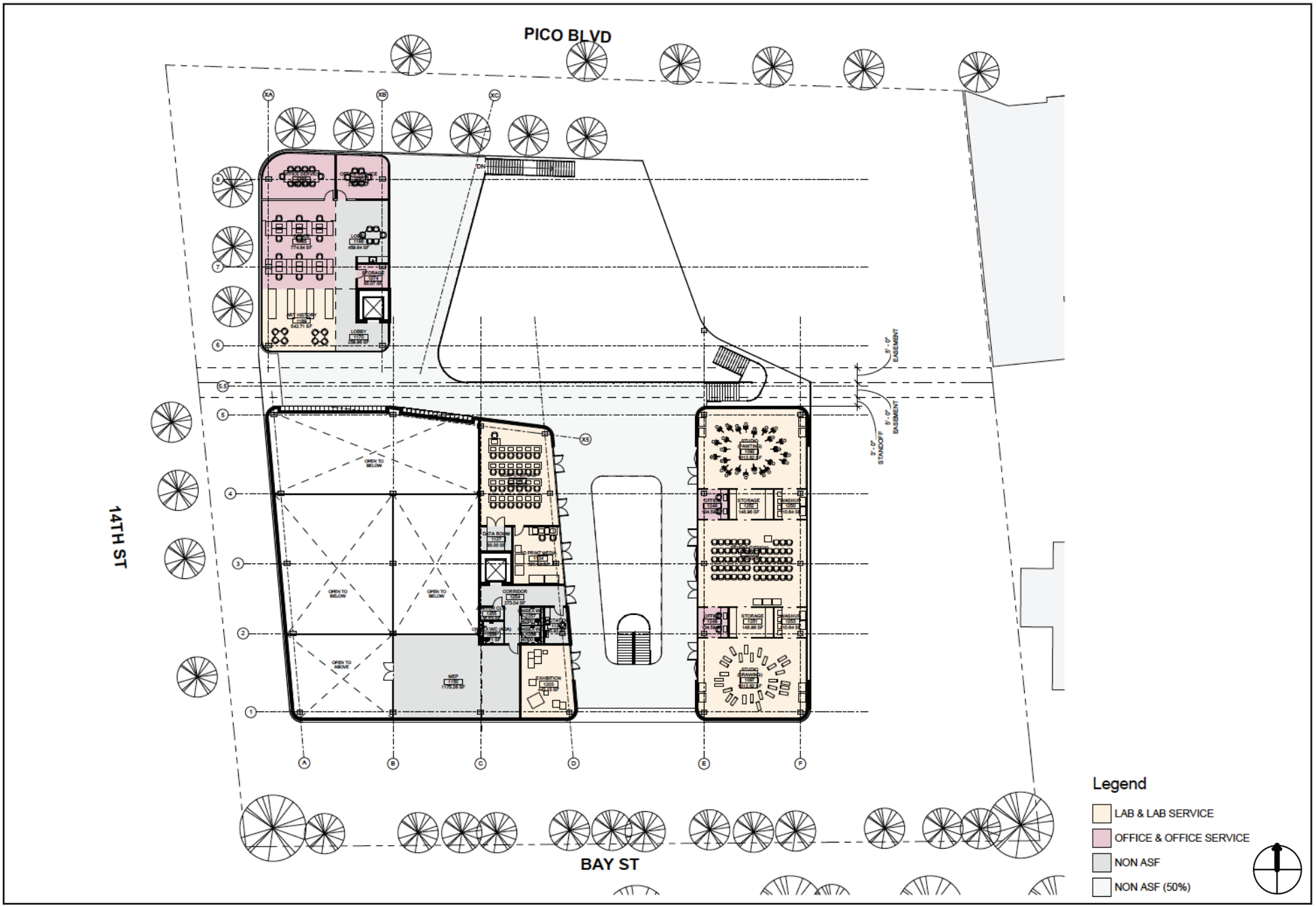
Figure 3.7
First Floor Plan



Source: Grimshaw Architects; Little Diversified Architectural Consulting, March 13, 2020.

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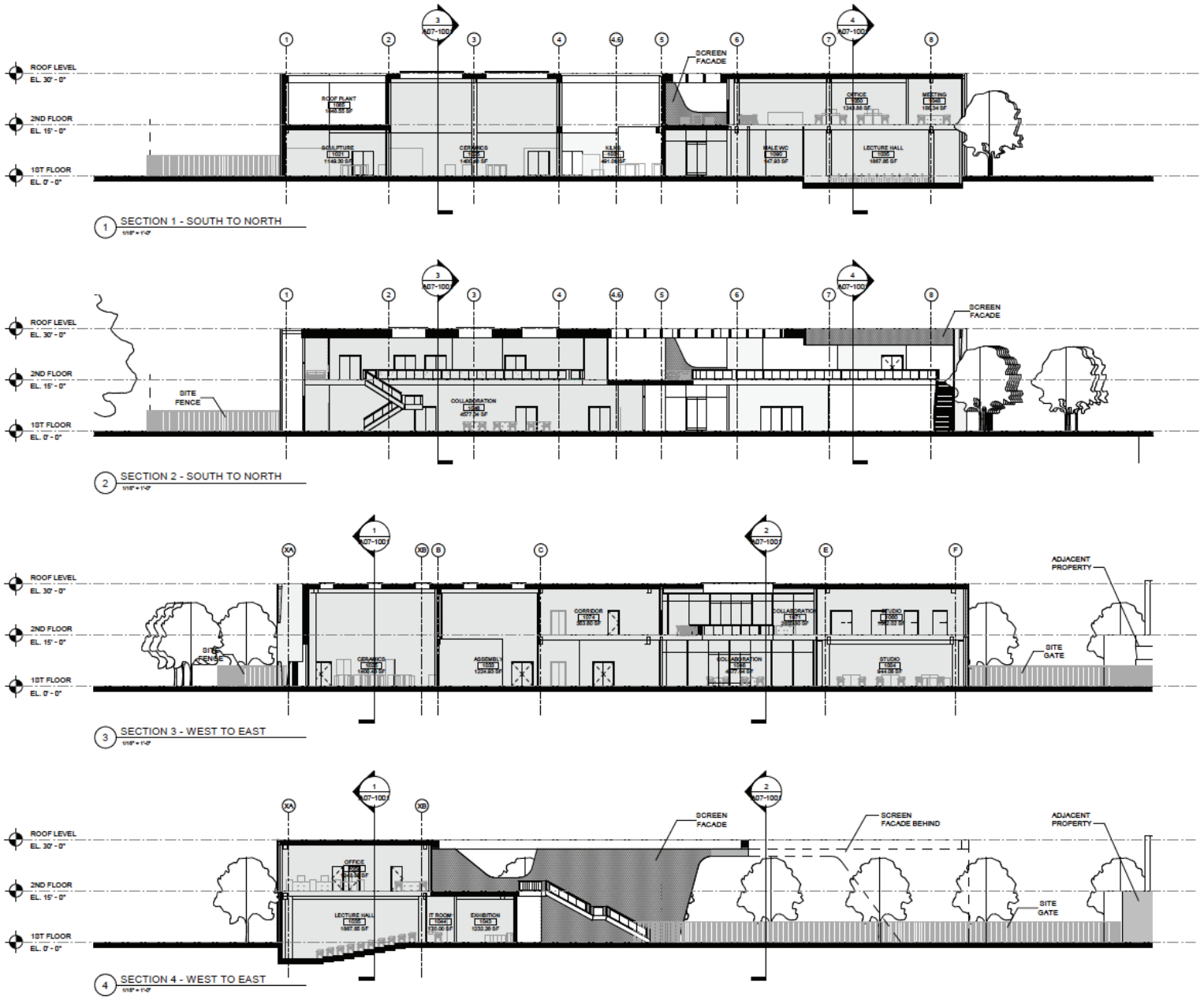
Figure 3.8
Second Floor Plan



Source: Grimshaw Architects; Little Diversified Architectural Consulting, March 13, 2020.

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Figure 3.9
Building Sections

A. Floor Area

The Project Site includes a lot area of 71,860 square feet. The Proposed Project would provide a total floor area of 20,720 square feet that would include a classroom space, laboratories, and office spaces. Based on the proposed floor area, the Proposed Project would result in a FAR of 0.29:1.

B. Building Height

Based on the Zoning Ordinance Update (effective March 30, 2017), developments in a NC zone are allowed a maximum height of 32 feet above grade. Based on the R1 Interim Zoning Ordinance (effective March 16, 2018), the developments in a R1 zone are allowed a maximum height of 28 feet above grade. Nevertheless, as noted above, the District is not required to comply with the City of Santa Monica's Zoning Ordinance, which otherwise sets height restrictions. The Proposed Project would be a maximum height of 40 feet above grade at the roof level. Building sections of the Proposed Project are provided in Figure 3.9, Building Elevations.

C. Open Space and Landscaping

Drought-tolerant and native planting materials would be incorporated around the building to minimize the irrigation demand. Stormwater runoff design would promote natural filtration into the soil.

D. Access, Circulation, and Parking

The Project Site is located on a corner lot and is bound by Pico Boulevard to the north, 14th Street to the west, and Bay Street to the south. There are currently three curb cuts along the Project Site's Pico Boulevard frontage; however, only one access driveway is provided. The other two driveway curb cuts are inaccessible due to landscaped areas and configuration of the existing surface parking within Lot 6. Additionally, there are two driveway curb cuts along the Project Site's 14th Street frontage. However, similar to the Pico Boulevard frontage, the northerly curb cut on 14th Street does not currently provide access to the site due to the configuration of Lot 6. Access to the Proposed Project is proposed via a right-in/right out driveway on Pico Boulevard and one full-access emergency only driveway on 14th Street.

The Proposed Project would include approximately 20 general purpose at grade parking spaces (including two Americans with Disabilities Act (ADA) spaces) on-site to accommodate staff, pick-up and drop-off, and deliveries. The remainder of the Proposed Project's parking demand would be satisfied on the Main Campus.

E. Lighting and Signage

Natural lighting would be incorporated into most interior spaces within the new building. Energy saving lighting would include automatic lighting controls and sensors. Photovoltaic panels would be incorporated where appropriate in accordance with Title 24 (CAL Green Building Efficiency Standards for Non-Residential Buildings) and the California Community Colleges Board of Governors Energy and Sustainability Policy.

F. Sustainability Features

In accordance with the California Community Colleges Board of Governors Energy and Sustainability Policy, the Proposed Project would be designed to exceed Title 24, Part 6 Energy Code by at least 15%. The Project design should incorporate sustainable goals for site and energy efficiency, water use reduction, stormwater management, occupant health, as well as minimizing the building's impact on the environment, both by design and construction. The following are strategies to consider:

- The proposed building design will incorporate and achieve the successful sustainable building standards of Santa Monica College with features to exceed the requirements of Title 24, part 6 Energy Efficiency by at least 15% with a goal to meet Leadership in Energy and Environmental Design (LEED®) Silver certification.
- Drought-resistant and native planting materials would be incorporated around the building to minimize the irrigation demand.
- Stormwater runoff design would promote natural filtration into the soil.
- Solar heat gain reduction measures would be used.
- Heating and cooling would be provided by a highly energy efficient HVAC system with controls designed to maximize efficiency.
- Natural lighting would be incorporated into most spaces.
- Energy saving lighting would include automatic lighting controls and sensors.
- Interior materials would be low in volatile organic compounds and high in recycled content.
- Water efficient fixtures, faucets, and devices would be incorporated.
- A strict recycling program would be required during construction.
- The Proposed Project would participate in the local utility's energy incentive program.
- Photovoltaic panels would be incorporated where appropriate.

G. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 24 months, with final buildout occurring in 2024. Construction activities associated with the Project would be undertaken in four main steps: (1) demolition; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities.

As provided in SMMC Section 4.12.110, the permissible hours of construction within the City of Santa Monica are 8:00 AM to 6:00 PM Monday through Friday, and 9:00 AM to 5:00 PM on Saturday; provided, however, that permission authorizing construction activity during the times otherwise prohibited by the Noise Ordinance may be granted when it is found to be in the public interest. Furthermore, absent such permission no construction activities are permitted on Sundays or any nationally recognized holidays. The Proposed Project would comply with these restrictions.

Demolition/Site Clearing Phase

The Proposed Project would demolish the existing surface Parking Lot 6 at 1410 Pico Boulevard. The additional two parcels are currently vacant with minimal ornamental vegetation which will be cleared to prepare the site for development. This phase would include the removal of walls, fences, associated debris, and all existing trees presently found on the Project Site. The demolition/site clearing phase would be completed in approximately one month.

Grading, Excavation, and Foundation Phase

After the completion of the demolition phase, the grading and excavation phase for the Proposed Project would occur for approximately three months and would involve up to 32,000 cubic yards of soil export. The Proposed Project would include a partial subterranean basement level to accommodate storage and building mechanical systems.

Building Construction Phase

The building construction phase consists of above grade structure(s) and is expected to occur for approximately 16 months. The building construction phase includes the construction of the proposed building, connection of utilities to the building, building foundations, laying irrigation for landscaping, and landscaping the Project Site.

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately four months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing and paint would be applied, and the installation of windows, doors, cabinetry, and appliances within the classrooms, laboratories, and administrative office units would take place.

Temporary Right-of-Way Encroachment

Construction activities may necessitate temporary lane closures on Pico Boulevard and 14th Street adjacent to the Project Site on a temporary and/or intermittent basis during construction for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City of Santa Monica and would conform to City of Santa Monica standards.

Haul Route

Soil export would be transported to an acceptable fill site or regional inert landfill. All construction and demolition debris would be recycled to the maximum extent feasible and transported to an area waste diversion and recycling center such as the Southern California Disposal located at 1908 Frank Street in the City of Santa Monica, approximately 1.6 miles northeast of the Project Site. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon Landfill, which accepts construction and demolition debris from areas within the City of Santa Monica. The Sunshine Canyon Landfill is approximately 28 miles north of the Project Site (approx. 56 miles round trip). Soil export debris is an inert material and would be hauled to the Azusa Land Reclamation, which accepts inert solid waste. Azusa Land Reclamation is located approximately 39 miles east of the Project Site (approx. 78 miles round trip).

The local haul route from the Project Site to Sunshine Canyon Landfill and Azusa Land Reclamation would utilize 14th Street north to Olympic Boulevard, east on Olympic Boulevard to Cloverfield Boulevard, and south on Cloverfield Boulevard to access the I-10 Freeway. The return trips would utilize the same roads but in a westward and southbound direction.

3.3.1 Related Projects

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064(h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*

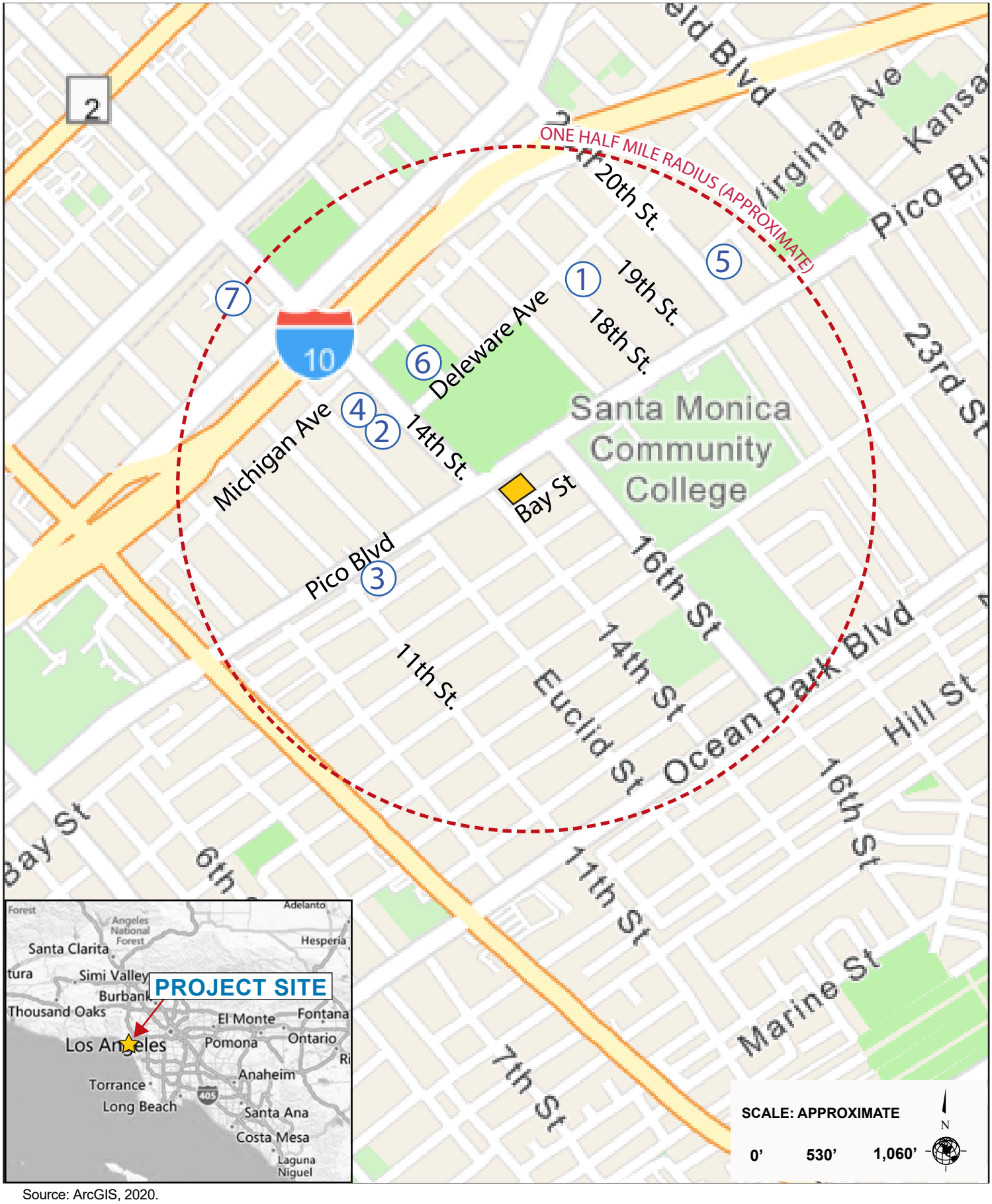
(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact(s), in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects within a ½ mile radius of the Project Site that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation. These related projects are summarized in Table 3.3, below. The location of the related projects are identified in the Related Project Location Map provided in Figure 3.10.

Table 3.3
Related Project List

Number [a]	Project Name	Location	Land Use	Description (Units)
1	1802 Delaware Avenue	1802 Delaware Ave	Condominiums	3 du
2	1834 14th Street	1834 14th St	Residential Commercial	55 du 3,500 sf
3	1112 Pico Boulevard Residential	1112 Pico Boulevard	Residential	32 du
4	39 Unit 100% Affordable Senior Housing	1824 14th St	Residential	39 du
5	2020 Virginia Avenue	2020 Virginia Ave	Residential	21 du
6	1413 Michigan Avenue	1413 Michigan Ave	Residential	42 du
7	Euclid Creative Office Building	1643-51 Euclid Street	Creative Office	26,289 sf

Notes:
du = dwelling units, sf = square feet
[a] The Related Project Numbers correspond to the Related Projects Map provided in Figure 3.10.
Source: City of Santa Monica, Major Development Projects, Approved/Denied/Withdrawn Projects, 1/28/2020.



Source: ArcGIS, 2020.

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Figure 3.10
Related Projects Location Map

Requested Permits and Approvals

The Santa Monica Community College District (District) is identified as the Lead Agency for purposes of complying with CEQA, and is the primary public agency responsible for approving this project. Discretionary approvals anticipated at this time may include, but are not limited to:

(1) Adoption of the IS/MND and all land use decisions necessary for project approval by the Santa Monica College Board of Trustees, the decision-making body of the Santa Monica Community College District.

(2) Approval of an Amendment to the SMC Career and Educational Facilities Master Plan (2010 Update) to incorporate two parcels (APN 4284-034-014 and APN 4284-034-004) with a total lot area of approximately 43,400 square feet (approximately 1 acre) for the proposed construction and operation of the Santa Monica College Art Complex Replacement Project consisting of approximately 31,877 gross square feet (GSF) of floor area.

Other approvals, as may be necessary, in accordance with all applicable laws and regulations. The College will be required to submit the Proposed Project's building plans to the Division of State Architect (DSA) for structural safety, access compliance, and fire and life safety approvals.

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Section 4 Environmental Checklist and Impact Analysis

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387), as amended on January 1, 2019.

1. Aesthetics

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

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes a proposal to develop or allow development in an existing natural open space area, or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described

in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

As shown in the site photographs in Figure 3.4, the Project Site is currently a college-affiliated parking lot and vacant, undeveloped land. Views in the vicinity of the Project Site are largely constrained by the urbanized surrounding area. There are no locally designated or protected scenic views provided from or through the Project Site, as there are no existing natural open space areas or panoramic views or focal views. Across from the Project Site, across Pico Boulevard, is the City of Santa Monica Woodlawn Cemetery, which is not considered a scenic vista in the City's Conservation Element. Therefore, implementation of the Proposed Project would not damage scenic resources, as there are no scenic public views or vistas available from the Project Site due to the existing urbanized and developed surrounding area (See Figure 3.5, Views 7-12). Therefore, impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact. A significant impact may occur if scenic resources would be damaged and/or removed by development of a project.

Implementation of the Proposed Project would not damage scenic resources related to a State scenic highway or locally designated scenic corridor, since the Project Site is not located along a designated State Scenic Highway. The nearest eligible State scenic highway is State Route 187, which runs along Venice Boulevard in Los Angeles from Lincoln Boulevard (CA-1) in Venice to the I-10 Freeway. This eligible State scenic highway is located approximately two miles southeast from the Project Site. The nearest officially designated State scenic highway is the Topanga Canyon State Scenic Highway, which is located along State Route (SR-27), located approximately 6.1 miles northwest of the Project Site.[1] Additionally, based on the City's Historic Resources Inventory, the nearest designated historic resource is the City Landmark Nikkei Kai (Social Hall), built in 1957 on 1413 Michigan Avenue, located approximately 0.3 miles

[1] *Caltrans Scenic Highways, Scenic Highway System Lists, List of Eligible and Officially Designated State Scenic Highways (XLSX), website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed January 2020.*

northwest from the Project Site.[2] Based on the distance to this historic landmark, the development of the Proposed Project would not negatively affect the physical integrity of any historical resource. Further, there are no significant trees or unique geologic features on-site. Given the locations of the nearest eligible and designated scenic highways to the Project Site and the boundaries of the Project Site, the Proposed Project would not damage scenic resources, including trees, rock outcroppings, and historic buildings within an eligible or designated scenic highway. Therefore, the Proposed Project would have no impact to scenic resources, historical structures, and scenic highways.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines. As such, a significant impact may occur if the Proposed Project is in conflict with applicable zoning and other regulations governing scenic quality.

The Project Site is located in an urban area. The Project Site would not degrade the existing visual character or quality of the Site and its surroundings for a non-urbanized area since the Project Site is located in an urbanized area within Santa Monica. The Project Site's existing zoning and General Plan land use designations include R1 (Single-Unit Residential) and NC (Neighborhood Commercial). Development in the City is typically subject to the land use regulations of the City of Santa Monica General Plan and the City of Santa Monica Zoning Ordinance. However, the Project Site is owned by the Santa Monica Community College District and is controlled and operated by the College under a land lease agreement. The District operates under the provisions of Section 53094 of the California Government Code, which provides that school districts may override the local zoning ordinance, except for certain non-classroom facilities. Therefore, the Proposed Project is exempt from the City's Zoning Ordinance.

[2] *City of Santa Monica, Department of Planning and Community Development, Historic Preservation in Santa Monica, Interactive Map Showing All of the City Landmarks, Structures of Merit, and Historic Districts, website: https://smgov.maps.arcgis.com/apps/webappviewer/index.html?id=5b1731008e8c4b36a1eb6e5984a7860b, accessed January 2020.*

Nevertheless, the Proposed Project would be compatible with the surrounding land uses, as the Project Site is located one street west from the SMC main campus and located adjacent to the SMC Campus and Alumni Relations and the Santa Monica College Foundation. As such, the Proposed Project would be compatible with the aesthetics or the quality of the surrounding area. Additionally, the Proposed Project would be designed to comply with applicable design guidelines, which would ensure that the Project is visually compatible with the surrounding uses. Therefore, the Proposed Project would have a less than significant impact regarding zoning and scenic quality.

Shade and Shadow

The Proposed Project would involve the construction of a two-story Art Complex building that would reach a maximum height of up to 40 feet. Surrounding uses that may be considered shadow-sensitive include the Santa Monica Woodlawn Cemetery, located north of the Project Site; the Palm Motel and multi-family residential uses, located to the west of the Project Site; and the single-family residences, located to the east of the Project Site.

For purposes of this analysis, a shade and shadow impact would be considered significant if the Proposed Project creates substantial shade and shadows that affect shadow sensitive uses (e.g., residential uses or outdoor spaces associated with residential or recreational uses or existing solar panels) for more than 3 hours between 9:00 a.m. and 3:00 p.m. from late October to early April or for more than 4 hours between 9:00 a.m. and 5:00 p.m. from early April to late October. The Proposed Project's shadow patterns were analyzed using the Amethyst ShadowFX V3 software program that enables planners to approximate the length and direction of shadows cast by a structure for any latitude, longitude, time and date. It should be noted that the building footprint and height assumed for the proposed building is considered a worst-case scenario. The actual building massing will be designed to include step-downs in the roofline and building façade, thereby reducing the project shadows.

Illustrations depicting the Proposed Project's estimated shadow envelope are provided in Figures 4.1 through 4.16, below. These figures represent the potential shadow envelope that would be cast on the surrounding area if the area was completely flat and was developed with low-rise structures. As shown in Figure 4.1 through Figure 4.16, the Proposed Project would not cast a shadow on any sensitive receptor for longer than three hours in the winter months, nor for longer than four hours in the summer months. Therefore, shade and shadow impacts would be less than significant.

Source: Google Earth, Aerial View, 2020.

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Figure 4.1
Winter Solstice Shadows
9:00 A.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.2
Winter Solstice Shadows
10:00 A.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.3
Winter Solstice Shadows
11:00 A.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.4
Winter Solstice Shadows
12:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.5
Winter Solstice Shadows
1:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.6
Winter Solstice Shadows
2:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.7
Winter Solstice Shadows
3:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.8
Summer Solstice Shadows
9:00 A.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.9
Summer Solstice Shadows
10:00 A.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.10
Summer Solstice Shadows
11:00 A.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.11
Summer Solstice Shadows
12:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.12
Summer Solstice Shadows
1:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.13
Summer Solstice Shadows
2:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.14
Summer Solstice Shadows
3:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.15
Summer Solstice Shadows
4:00 P.M.

Source: Google Earth, Aerial View, 2020.

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Figure 4.16
Summer Solstice Shadows
5:00 P.M.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact. A significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the Proposed Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

The Project Site is located in an urbanized area within the City of Santa Monica and is surrounded by public institutional, commercial, and residential land uses. The Proposed Project would replace the existing Art Complex program currently located on the main campus and at the off-site Airport Arts Campus with a new facility to consolidate the Art Program into a single building. The Proposed Project would include a two-story building with classrooms, laboratory, and office space, all of which would comply with ADA and building code requirements. The Proposed Project would provide low-level exterior light fixtures designed to highlight and provide security for pedestrian pathways and entrances. The Proposed Project would not generate a new substantial increase in ambient lighting as the exterior lighting fixtures would consist of low-level security and walkway lighting which would be directed toward the ground and away from adjacent properties. The proposed building would conform to all applicable Santa Monica Municipal Code (SMMC) and building code requirements pertaining to light.

Additionally, the Proposed Project is located in a highly urbanized and developed area, and the Proposed Project's architectural materials and landscaping would prevent unnecessary glare. The Proposed Project's landscaped courtyards and green areas would serve to reduce the building's heat gain and reflective glare potential. The Proposed Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. Therefore, the Proposed Project's potential impacts related to light and glare would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses within the City of Santa Monica and designated neighborhoods defined in the LUCE. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some of the related projects would be subject to site plan review by the

Santa Monica Department of Planning and Community Development for review and approval, as may be applicable. The site plan review process would ensure each related project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant.

2. 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

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

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

No Impact. The Project Site is currently developed with a college-affiliated staff parking lot and vacant land located in an urbanized area within the City of Santa Monica. No farmland or agricultural activity exists on the Project Site, nor is there any farmland or agricultural activities in the vicinity of the Project Site. According to the Los Angeles County Important Farmland 2016 map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not a candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[3] Therefore, no impact to agricultural lands would occur.

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

No Impact. The Proposed Project would not conflict with an existing zoning ordinance for agricultural uses because the Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[4] Therefore, no impact would occur.

[3] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed January 2020.*

[4] *State of California Natural Resources Agency, Department of Conservation, Los Angeles County Williamson Act, Fiscal Year 2015-2016 Map, PDF.*

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

No Impact. The Project Site is zoned NC and R1 and have land use designations of Neighborhood Commercial and Single Family Housing, respectively, within the City of Santa Monica. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The Project Site is developed with a college-affiliated staff parking lot and vacant land that were previously developed within an urbanized area of the City of Santa Monica. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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

No Impact. Neither the Project Site nor any nearby properties are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the Los Angeles County Important Farmland 2016 map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor would it result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.[5] The Project Site is located in an urbanized area in the

[5] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf, accessed January 2020.*

City of Santa Monica and does not include any State-designated agricultural lands or forest or timberland uses. Therefore, no cumulative impact would occur.

3. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 (2016 AQMP). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities to promote reductions in greenhouse gasses and toxic risk, as well as to seek better efficiency in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles and the modernization of

buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality but also local businesses and the regional economy.

In addition, the Southern California Association of Governments (SCAG), an agency that develops long-range regional transportation plans, regional housing needs, growth forecasts, and transportation improvement programs for 6 of the 10 counties located in southern California, approved its 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and State Implementation Plan (SIP) for the South Coast Air Basin (Basin), are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). Therefore, for the purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are also considered consistent with the 2016 AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the 2016 AQMP.

The Proposed Project includes institutional land uses and, as such, is a community serving land use that does not result in substantial population growth. The Proposed Project is consistent with the smart growth policies of the 2016 RTP/SCS to increase development within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Proposed Project would concentrate new development within a half of a mile (walking distance) of several well-served Metro and Santa Monica BBB bus lines that connect to regions of the Los Angeles area. Thus, the Project Site's location provides opportunities for students and employees to use public transit to reduce vehicle trips. Reports by the California Department of Transportation and SCAG have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption.[6,7] Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS, the

[6] *California Department of Transportation, California Transportation Plan 2040, June, 2016, website: http://www.dot.ca.gov/hq/tpp/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf, accessed August 2019.*

[7] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, April 2016.*

Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in the State non-attainment for ozone, PM_{10} and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 24 months, with a final buildout year in 2023. This construction schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; and (4) architectural coating/finishing. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment on-site and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases

(ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Proposed Project's construction activities:

- Compliance with provisions of the SCAQMD District Rule 403. The Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
    - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
    - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
    - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
    - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
    - Trucks having no current hauling activity shall not idle but be turned off.
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table 4.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development.

Table 4.1
Estimated Peak Daily Construction Emissions

	Emissions in Pounds per Day					
Emission Source	**ROG**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition/Site Preparation						
On-Site Fugitive Dust	--	--	--	--	0.28	0.04
On-Site Off-Road Diesel Equipment	1.99	19.70	14.49	0.02	1.04	0.97
Off-Site Hauling/Vendor/Worker Trips	0.09	0.99	0.70	<0.01	0.22	0.06
Total Emissions	***2.08***	***20.69***	***15.19***	***0.02***	***1.54***	***1.07***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	2.07	1.12
On-Site Off-Road Diesel Equipment	1.52	16.49	9.62	0.02	0.74	0.68
Off-Site Hauling/Vendor/Worker Trips	0.76	23.47	5.80	0.08	2.01	0.61
Total Emissions	***2.28***	***39.96***	***15.42***	***0.10***	***4.82***	***2.41***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	2.55	20.52	20.44	0.03	1.05	1.01
Off-Site Hauling/Vendor/Worker Trips	0.09	0.62	0.70	<0.01	0.21	0.06
Total Emissions	***2.64***	***21.14***	***21.14***	***0.03***	***1.26***	***1.07***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Architectural Coating						
On-Site Architectural Coating	2.07	--	--	--	0.00	0.00
On-Site Off-Road Diesel Equipment	0.84	6.27	9.42	0.02	0.30	0.30
Off-Site Hauling/Vendor/Worker Trips	0.01	<0.01	0.09	<0.01	0.03	<0.01
Total Emissions	***2.92***	***6.27***	***9.51***	***0.02***	***0.33***	***0.30***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings.
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.

Operational Emissions

Existing Emissions

The Proposed Project is currently a college-affiliated staff parking lot with vacant land. The surface parking lot accommodates existing parking demand from the Main Campus. Therefore, this analysis assumes there are no existing air quality emissions from the Project Site as the vehicles parking at the Project Site are originating from other land uses in the area.

Proposed Project Emissions

The Proposed Project would result in the development of a two-story, 20,720 square-foot Art Complex Replacement building with classrooms, laboratories, and office space. Although the Proposed Project would replace the Art Complex on the main campus and would result in the inactivation of the art space at the Airport campus, it was conservatively assumed that the Proposed Project would not take credit for the existing Art Complex and Airport art space emissions from off-site uses. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*). The results of these calculations are presented in Table 4.2, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent

Table 4.2
Proposed Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Area Sources	0.49	<0.01	0.24	<0.01	<0.01	<0.01
Energy Sources	0.01	0.12	0.10	<0.01	<0.01	<0.01
Mobile Sources	4.30	18.66	55.34	0.22	18.40	5.02
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
Total Project Emissions	***5.62***	***22.45***	***57.77***	***0.22***	***18.52***	***5.14***
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.49	<0.01	0.24	<0.01	<0.01	<0.01
Energy Sources	0.01	0.12	0.10	<0.01	<0.01	<0.01
Mobile Sources	4.07	18.99	51.79	0.20	18.40	5.02
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
Total Project Emissions	***5.39***	***22.78***	***54.22***	***0.20***	***18.52***	***5.14***
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.

centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.[8]

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the number of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[9] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance

[8] *South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005 website: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf, accessed March 2020.*

[9] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

of the most stringent applicable federal or State ambient air quality standards. LSTs are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 − Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 2, which covers the Northwest Los Angeles County Coastal area, including the City of Santa Monica.[10] The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the Project Site is approximately 1.65 acres, the one-acre LSTs were conservatively applied for the Proposed Project. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are the single-family residences adjacent to the Project Site on Bay Street to the east, southeast, and south; and the multi-family residences and the Palm Motel located across 14th Street, to the southwest and west of the Project Site. Given the proximity of these sensitive receptors to the portion of the Project Site, the LSTs for a one-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 4.3, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 2. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas.

[10] *South Coast Air Quality Management District General Forecast Areas & Air Monitoring Areas, 1999, website: http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf, accessed January 2020.*

Table 4.3
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing	19.70	14.49	1.31	1.01
Grading/Excavation	16.49	9.62	2.81	1.81
Building Construction	20.52	20.44	1.05	1.01
Architectural Coatings	6.27	9.42	0.30	0.30
SCAQMD Localized Thresholds [c]	**103**	**562**	**4**	**3**
Potentially Significant Impact?	*No*	*No*	*No*	*No*

[a] *The localized thresholds for all phases are based on a receptor within a distance of 82 feet (25 meters) in SCAQMD's SRA 2 for a Project Site of one acre.*
[b] *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.

Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Localized Operation Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Basin is currently in attainment for CO emissions, and based on existing ambient CO levels within the Basin, the Proposed Project's mobile source emissions would not exceed the 1-hour or 8-hour CO hotspot concentration threshold for creating a significant impact. This finding is consistent with the AQMD's 2003 AQMP, which modeled localized CO emissions at the four highest traffic volume intersections within the Basin and found the localized emissions to be well below the thresholds of significance for both the 1-hour and 8-hour thresholds. The study intersections included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The intersection of Wilshire Boulevard and Veteran Avenue, which is located approximately 3.28 miles northeast of the Project Site, was identified as the most congested intersection in Los Angeles County, with an average

daily traffic volume of about 100,000 vehicles per day.[11] As reported in the 2016 AQMP, the highest concentrations of CO continued to be recorded in the areas of Los Angeles County with the maximum 8-hour and 1-hour concentration (4.3 ppm and 3.0 ppm, respectively) recorded in the South Central Los Angeles County area. Thus, as the Basin is still in attainment for CO, and since ambient CO concentrations in the Basin remain lower than the highest recorded CO concentrations in 2003, it can be concluded that the Proposed Project would not result in a significant localized CO hotspot impact.

Toxic Air Contaminants (TAC)

Construction Emissions

The Proposed Project's construction activities would generate toxic air contaminants (TACs) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 24 months, the Proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (24 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact.

Operational Emissions

The Proposed Project consists of an art complex for the SMC Main Campus. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such, no significant toxic airborne emissions would result from Proposed Project implementation.

[11] *South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24*

In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant

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

A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

During construction, potential sources that may emit odors during construction activities include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would control objectionable construction odors. Therefore, impacts from potential objectionable odors during construction would be less than significant.

The Proposed Project does not include any of the uses identified by the SCAQMD as being associated with odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Odors from garbage chutes and enclosed refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. The trash collection areas would be enclosed and would not be located near any habitable areas. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. With compliance with SCAQMD Rules 402, described above, potential objectionable odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City of Santa Monica. Cumulative development can affect the implementation of the 2016

AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth, and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan.

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents.

4. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

Less Than Significant Impact. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern under state or federal plans, policies or regulations; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species

behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is located along the Pico Boulevard neighborhood commercial corridor. With the exception of the Santa Monica Woodlawn Cemetery, Mausoleum, and Mortuary, the surrounding area is developed with commercial, residential, and institutional buildings. Based on a database query of the US Fish and Wildlife Service's IPaC Resource List (see Appendix H), there are two species of birds (the Coastal California Gnatcatcher and the Western Snowy Plover) identified as threatened and one flowering plant (Gambel's Watercress) identified as endangered, which are known to occur within the broader project area. However, the Project Site is located out of the critical habitat zone for both the Coastal California Gnatcatcher and the Western Snowy Plover, and no critical habitat has been designated for the Gambel's Watercress.

Additionally, the Project Site is improved with a surface parking lot and a vacant lot that was recently demolished and is nearly devoid of all vegetation. A few ornamental tree species exist within the Project Site boundaries. Removal of these trees would have the potential to result in a take of protected nesting native bird species. All migratory non-game native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Planning and Facilities Development Department enforces the MBTA through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction.

The Project contractors would be required to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the existing trees located on the Project Site. If Proposed Project activities cannot feasibly avoid the breeding bird season, in accordance with the California Department of Fish and Game, beginning thirty days prior to the disturbance of suitable nesting habitat the Applicant would be required to arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. If a protected nesting bird is found, the contractor would be required to delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. With adherence to existing laws and regulatory compliance measures, the Proposed Project would have a less than significant impact on sensitive biological species.

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 Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is developed with a surface parking lot and vacant lot. No riparian habitats are located in, surrounding, or pass through the Project Site, nor is the Project Site the location of any natural community. Due to the Project Site's previous development history, its current uses, and the surrounding developed land uses within the City, the implementation of the Proposed Project would not result in any adverse impacts to a riparian habitat or sensitive natural communities. Therefore, no impact would occur.

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

No Impact. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. As previously mentioned, the Project Site has been previously graded and developed over the years and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (See Section IV(b), above), and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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?

No Impact. A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is currently developed with a parking lot and vacant lot. Vegetation in the vicinity of the Project is limited to ornamental landscaping in the form of trees and shrubbery. Due to the urban location of the Project Site within the City of Santa Monica and the surrounding developed area, there are no wildlife corridors or native wildlife nursery sites in the Proposed Project vicinity. Therefore, the Proposed Project would not interfere with the movement of any resident or migratory fish or wildlife species or wildlife corridors or impede native wildlife nursery sites, and no impacts would occur with respect to the Proposed Project.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources. Within the City of Santa Monica, the removal of trees is regulated under Article 7 Public Works, Chapter 7.40 Tree Code (Tree Code) of the Santa Monica Municipal Code (SMMC) and the City's visionary Urban Forest Master Plan regarding the removal of trees on public land and within the public right-of-way. There are 17 trees within the Project Site and seven street trees within the public right-of-way, five along Pico Boulevard and two along 14th Street. All 17 trees located on-site are proposed to be removed from the Project Site. None of the trees to be removed are protected under a policy or ordinance. New replacement trees would be planted on-site in accordance with the proposed landscape plan. No street trees are proposed to be removed in the public right of way. Thus, the Proposed Project would not be in conflict with the City of Santa Monica Tree Code or the Urban Forest Master Plan, and impacts related to the loss of trees would be less than significant.

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

No Impact. A significant impact would occur if the Proposed Project would be inconsistent with mapping or policies in any conservation plans of the types cited above. The Project Site is located within the Santa Monica Urban Forest Master Plan, which is considered a conservation policy document that outlines guiding principles, goals, and strategies to better preserve and enhance City-owned public trees and the public tree canopy within the City. There is a well-established street tree canopy on Bay Street, immediately south of the Project Site. However, the Proposed Project does not propose the removal of any public street trees along Bay Street. Further, the canopy of the street trees does not extend into the Project Site, and none of the trees abut the Project Site such that roots would be impacted by the Proposed Project. As such, the Proposed Project not be in conflict with an adopted conservation plan. As such, impacts to habitat conservation would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with regulatory compliance. As the related projects would also have to adhere to the US Fish and Wildlife and California Department of Fish and Wildlife regulatory compliance, development of the Proposed Project in combination with related projects would not significantly impact wildlife corridors or habitat for any endangered, threatened, rare, protected, candidate,

sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS. In addition, no such habitat occurs in the vicinity of the Project Site due to urban location of the Project Site within the City of Santa Monica and the surrounding developed area. Development of any of the related projects would be subject to the SMMC Tree Code, the City's Urban Forest Master Plan, Federal Migratory Bird Treaty Act, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and any other mitigation measures or regulatory compliance measures applicable to each project site. As such, cumulative impacts to biological resources would be less than significant.

5. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would result in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) 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) 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. A substantial adverse change in the significance of a historic resource means demolition,

destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[12]

The Project Site is currently developed with a surface parking lot and vacant, undeveloped land, which underwent recent demolition. The Proposed Project involves the construction of a two-story Art Complex building to consolidate the Santa Monica College Art Program into one building located across the street from the SMC main campus. According to the City's Historic Resources Inventory, the Project Site is not identified as a designated National, State, or Local Historic Resource. [13] The nearest designated historic resource to the Project Site is the City Landmark Nikkei Kai (Social Hall) building. This building was built in 1957 and located at 1413 Michigan Avenue, approximately 0.3 miles northwest from the Project Site.[14] The Proposed Project would have no direct impacts on this historic resource. There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project would have a less than significant impact on the potentially historical resources near the Project Site as the Proposed Project does not directly abut the Nikkei Kai (Social Hall) building and would not result in a substantial adverse change to the immediate surroundings of this historical resource to the degree it would no longer be eligible for listing under national, state, or local landmark designation programs. It would continue to be eligible for listing as a historical resource defined by CEQA. No mitigation is required or recommended. Therefore, the development of the Proposed Project would have a less than significant impact to surrounding historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources.

The Project Site has been previously developed and has been subject to subsurface grading activities associated with former uses. The Proposed Project would include up to one subterranean level under the proposed building. While no archaeological

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[12] *CEQA Guidelines, Section 15064.5(b)(1).*

[13] *City of Santa Monica, Department of Planning and Community Development, Historic Preservation in Santa Monica, Interactive Map Showing All of the City Landmarks, Structures of Merit, and Historic Districts, website: https://smgov.maps.arcgis.com/apps/webappviewer/index.html?id=5b1731008e8c4b36a1eb6e5984a7860b, accessed January 2020.*

[14] *Ibid.*

resources are known to exist within the Project Site, there is a potential for the accidental discovery of unknown and unrecorded archaeological materials as the grading process would expose soils beneath the natural grade level. Accordingly, Mitigation Measure ARCHEO-1 is recommended to ensure compliance with state preservation laws and regulations. As such, potential impacts upon archaeological resources would be less than significant with adherence to applicable regulations including those set forth in California Public Resources Code Section 21083.2 and mitigation measure MM ARCHAEO-1, below.

MM ARCHAEO-1: In the event that archaeological resources are inadvertently discovered during surface grading or construction activities, work shall cease in the area within 50 feet of the find until a Registered Professional Archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site proposed to be developed. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. If the archaeologist determines that the find may qualify for listing in the California Register of Historic Resources (CRHR), the site shall be avoided or a data recovery plan shall be developed. Work shall not resume until authorization is received from SMC's Director of Facilities Management.

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

Less Than Significant Impact with Mitigation Incorporated. A project-related significant adverse effect could occur if grading activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site. As stated above, the Project Site has been previously developed and has been subject to subsurface grading activities associated with former uses. Thus, the potential to result in the accidental discovery of unknown interred human remains is extremely low. Nevertheless, if human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. Thus,

Mitigation Measure MM ARCHAEO-2, below is recommended to ensure compliance with all applicable regulations associated with the inadvertent discovery of human remains. Thus, with mitigation, potential impacts resulting from the inadvertent discovery of human remains would be less than significant.

MM-ARCHAEO-2: If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the College, inspect the site of the discovery of the Native American remains and may recommend to the College or the contractor responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the College to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the College shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the College has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The College shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the College rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the College, the College shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following compliance with applicable laws and the mitigation measures identified above. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant with mitigation.

6. Energy

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

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project results in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during a project's construction or operation. As previously mentioned, the Project Site includes a parking lot and two vacant, undeveloped lots. The Proposed Project would construct an Art Complex building on the southeast corner of Pico Boulevard and 14th Street affiliated with SMC.

The Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards located at Title 24, Part 6, Sections 120.0 to 120.9 and 130.0 to 141.0 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. California's Building Energy Efficiency Standards are updated on an approximate three-year cycle. The 2019 Standards will continue to improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2019 Standards is January 1, 2020.[15] The Energy Efficiency Standards are a specific response to the mandates of AB 32, (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. Additionally, in accordance with the California Community Colleges Board of Governors Energy and Sustainability Policy, the Proposed Project would be designed to exceed Title 24, Part 6 Energy Code by at least 15%. The Proposed Project would incorporate sustainable goals for site and energy efficiency, water use reduction, stormwater management, occupant health, as well as minimizing the building's impact on the environment, both by design and construction. Specifically, one of the stated objectives of the Proposed Project is to incorporate and achieve the successful sustainable building standards of Santa Monica College with a goal to meet Leadership in Energy and Environmental Design (LEED®) Silver certification.

Existing Infrastructure

The Project Site is located in an urbanized area within the City of Santa Monica. The surrounding area is adequately served with roads, sidewalks, and overhead utilities. Since the Proposed Project is currently a parking lot and vacant, undeveloped land, construction of the proposed Art Complex building would generate an increase in energy consumption at the Project Site as compared to existing conditions. The analysis below focuses on the change between the existing baseline condition and the condition with the construction and operation of the Proposed Project.

Electricity

Clean Power Alliance became the new electricity provider for the City of Santa Monica in 2019. Based on observation, overhead circuit lines bisect the Project Site parallel to

[15] *California Energy Commission, 2019 Building Energy Efficiency Standards, accessed January 2020.*

Pico Boulevard, and there are string lights and solar powered lighting poles that illuminate the surface parking lot area. The Proposed Project would require on-site transformers and may require underground line extension on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project Site vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Santa Monica and has been taken into account by Clean Power Alliance in the planned growth of the electrical system.

Natural Gas

Southern California Gas (SoCalGas) provides natural gas resources to the City through existing gas mains located under the streets and public rights-of-way. Natural gas services are provided in accordance with SoCalGas' policies and extension rules on file with the California Public Utilities Commissions (CPUC) at the time contractual agreements are made. Natural gas is delivered to the Project Site through natural gas facilities underneath the adjacent public streets. Construction of the Proposed Project would necessitate closing off existing service connections to the Project Site and re-establishing new service connections to the proposed structure. Such infrastructure improvements would be conducted on-site and within the right-of-way easements serving the Project Site area and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be localized to the portion of the Project Site to be developed, and (c) any foreseeable off-site improvements would be limited to the right-of-way easements in the immediate Project Site vicinity. Therefore, potential impacts resulting from natural gas infrastructure improvements would be less than significant.

Energy Consumption

Construction

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would generate

an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the grading and site preparation phase, and the consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and worker commute trips. In order to quantify the amount of diesel and gasoline fuel utilized for the Proposed Project's construction, the equipment usage, horsepower, load factors, and fuel rates from the construction phases and activities calculated in the CalEEMod worksheets for the Proposed Project were utilized to estimate the gallons of diesel and gasoline consumed (Appendix B, Energy Consumption Worksheets). Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. Construction of the Proposed Project would require the export of asphalt and building debris from the portion of the Project Site proposed to be developed during the demolition and site clearing phases. Additionally, construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period.

The total electricity, gasoline and diesel fuel anticipated to be used during construction is summarized in Table 4.4, Summary of Energy Usage During Construction, below. As shown, construction of the Proposed Project would consume approximately 4,264 kWh of electricity, approximately 52,068 gallons of diesel fuel and 3,337 gallons of gasoline during construction.[16]

Table 4.4
Construction Energy Use

Fuel Type	Quantity
Electricity	4,264 kWh [a]
Gasoline	3,337 gallons
Diesel	5,208 gallons

Notes:
[a] *kWh = Kilowatt-hour*
Source: Parker Environmental Consultants, 2020.
Calculation worksheets are provided in Appendix B to this IS/MND.

Due to the relatively short duration of the construction process, and the modest amount of fuel consumption inherent to construction projects of this moderate size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve

[16] *Refer to Energy Consumption Worksheets included as Appendix B in this IS/MND.*

to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Proposed Project or used during the operational life of the Proposed Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art technology in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Operation

Electricity

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code (CAL Green Standards for Non-Residential Buildings). Additionally, SMC aims to achieve LEED® Silver certification for the Proposed Project and, in accordance with the California Community Colleges Board of Governors Energy and Sustainability Policy, will be designed to exceed Title 24, Part 6, of the Energy Code by at least 15%. Based on well-founded performance based standards, LEED® emphasizes strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. Therefore, compliance with Title 24 of the California Administrative Code and achieving LEED Silver certification would reduce the Proposed Project's energy consumption with a demonstrated efficiency of at least 15% beyond Title 24 (Part 6) of the Energy Code. Additionally, as discussed above, electric service is available and would be provided to the development. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies.

The Proposed Project's electricity demands shown in Table 4.5 are estimated based on the calculated electricity usage provided in SCAQMD's CalEEMOD. As shown in Table 4.5, below, the estimated increase in electricity consumption by the Proposed Project would be approximately 196,881 kWh per year. Implementation of code compliance measures would ensure the Proposed Project meets and exceeds the minimum Title 24

energy efficiency requirements and further reduce demand for electricity, including peak power demands. Specifically, the Proposed Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Additionally, Clean Power Alliance, would confirm the availability of electric service connections for the Proposed Project. Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of electricity.

Table 4.5
Estimated Electricity Consumption by the Proposed Project

Land Use	Size	Total Electricity Demand (kWh/year) [a]
Proposed Uses		
Classrooms and Laboratories	19,028 sf	172,294
Office	1,692 sf	19,841
Surface Parking	20 spaces	4,746 [b]
Total Proposed Project Electricity Demand:		**196,881**

Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix D to this IS/MND.*
[b] *It should be noted that the energy calculations provided in the CalEEMod worksheets were conservatively based on 40 parking spaces, while only 20 spaces are proposed, As such, this estimate is conservative and slightly overstates the Proposed Project's anticipated energy use.*
Source: Parker Environmental Consultants, 2020.

Natural Gas

Natural gas for the Project Site is provided by SoCalGas. Gas supply available to SoCalGas from California sources averaged 323 million cubic feet (cf)/day in 2017. SoCalGas projects total natural gas demand to decrease at an annual rate of 0.74 percent per year from 2018 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas' projection for natural gas also decreases. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas' estimated physical capacity of upstream pipelines. SoCalGas' storage fields attain a combined theoretical storage

working inventory capacity of 137.1 billion cubic feet; of that, 112.5 billion cubic feet is allocated to residential, small industrial and commercial customers.[17] As shown in Table 4.6, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 454,741 kBTU per year or approximately 37,137 cubic feet per month, would represent a very small fraction of one percent of the SoCalGas' existing natural gas storage capacity and therefore, would be within the SoCalGas' existing natural gas storage capacity of 112.5 billion cubic feet as of 2018.

Table 4.6
Estimated Natural Gas Consumption by the Proposed Project

Land Use	Size	Total Natural Gas Demand (kBTU/yr) [a]	Total Natural Gas Demand (cf/month) [b]
Proposed Project			
Classrooms and Laboratories	19,028 sf	439,670	35,906
Office	1,692 sf	15,071	1,231
Total Proposed Project Natural Gas Demand:		**454,741**	**37,137**

Notes: sf =square feet; du = dwelling unit
[a] *SCAQMD, CalEEMod Version 2016.3.2, See Appendix D, Greenhouse Gas Worksheets.*
[b] *1kBTU is equivalent to 0.98 cubic feet of natural gas.*
Source: Parker Environmental Consultants, 2020.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. Title 24's Building Energy Efficiency Standards includes CAL Green Energy Efficiency Requirements for Non-Residential Buildings which contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the California Community Colleges Board of Governors Energy and Sustainability Policy would reduce the Proposed Project's energy consumption. Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of natural gas.

Fossil Fuels

Operation of the Proposed Project would generate vehicle trips associated with people driving to the Project Site for work and institutional purposes; and driving to and from work and other destinations throughout the region. Based on the trip generation rates provided in the Project Transportation Report, and the vehicle trip lengths calculated in the CalEEMod air quality worksheets, it is estimated that operation of the Proposed

[17] *California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, accessed March 2020.*

Project would result in a net decrease of approximately 6,588,307 annual vehicle miles traveled on an annual basis.[18] The Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. Further, the Project Site is located in the City of Santa Monica, which is highly connected to the regional transit network in the Los Angeles County area. Public transportation within the vicinity of the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, along with some regional/commuter public transit opportunities. In the vicinity of the Project Site, bus stops are primarily located along Pico Boulevard. Bus lines that operate in the Project Site area include Santa Monica BigBlueBus and Los Angeles Metro. These bus lines provide access to other bus lines that connect to other parts of the City and to the greater Los Angeles metropolitan area.

The Proposed Project is an infill development and would construct a two-story Art Complex building to serve SMC students. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some students and staff would take transit to their destinations, or would walk to destinations nearby. The reduction in vehicle trips would decrease the Proposed Project's reliance on fossil fuels. The Proposed Project would result in a net decrease in operational fuel usage of 218,448 gallons of gasoline and 63,046 gallons of diesel fuel per year, as shown in Table 4.7, below. This estimate would be further reduced with the promotion of electric vehicle supply equipment (EVSE) on-site. The provision of EVSE infrastructure would further serve to promote the utilization of alternative fueled vehicles thus reducing the combustion of fossil fuels. Based on these factors, the Proposed Project's vehicle trips would decrease overall per capita energy consumption, decrease reliance on fossil fuels, and would serve to promote reliance on renewable energy sources. As such, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of fossil fuels and would promote walking, biking, and other modes of public transportation.

As discussed in the preceding paragraphs, the Proposed Project would not result in wasteful, inefficient or unnecessary consumption of electricity, natural gas, or transportation energy during construction and operation. Therefore, impacts to energy resources would be less than significant.

[18] *See CalEEMod Worksheets included as Appendix A to this IS/MND.*

Table 4.7
Estimated Transportation Energy Consumption by the Proposed Project

	Annual VMTs (miles) [a]	Fuel Rate (mpg) [b]	Total Fuel Demand (gallons/year)
Diesel			
Proposed Project	395,298	6.27	63,046
		Net Diesel Consumption:	***63,046***
Gasoline			
Proposed Project	6,193,009	28.35	218,448
		Net Gasoline Consumption:	***218,448***

Notes: VMTs = vehicle miles traveled; mpg = miles per gallon
[a] *Appendix D, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles.*
[b] *Source: Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008)*
Parker Environmental Consultants, 2020.

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

Less Than Significant Impact. A significant impact could occur if the Proposed Project has the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

With respect to renewable energy, all of the Proposed Project's energy demands will be served by Clean Power Alliance and SoCalGas. As stated previously, Clean Power Alliance became the new electricity provider for the City of Santa Monica in 2019. Clean Power Alliance purchases electricity from clean and renewable energy sources, which are then delivered by Southern California Edison (SCE). The City of Santa Monica has chosen 100 percent green power as the default product for the community, taking one big step to reaching carbon neutrality. As the Proposed Project would derive its electricity from the Clean Power Alliance, the Proposed Project's energy demands will primarily be derived from renewable energy sources.

With respect to energy efficiency, the Proposed Project would be required to comply with the California Community Colleges Board of Governors Energy and Sustainability Policy, which requires the use of conservation measures, beyond those required by Title 24 of the California Administrative Code. Therefore, compliance with Title 24 of the California Administrative Code and California Community Colleges Board of Governors

Energy and Sustainability Policy would reduce the Proposed Project's energy consumption.

On a project specific level, the Proposed Project includes the following features, which will further reduce energy demands:

1. *Proximity to mass transit:* The Project Site is an infill site and is also located within ½ mile of bus routes with peak commute service intervals of 15 minutes or less. The nearest light rail station is the Expo Line at 17th Street and Colorado Avenue, approximately 0.56 mile north of the Project Site.

2. *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with a parking lot and vacant land, which is located in a highly developed area of Santa Monica. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

With incorporation of the features identified above, the Proposed Project would not result in any significant environmental effects with respect to renewable energy. The Proposed Project would be required to comply with the 2019 CAL Green Code, 2019 Title 24 standards, and the California Community Colleges Board of Governors Energy and Sustainability Policy standards. Compliance with state and College energy efficiency standards would ensure the Proposed Project meets all applicable energy conservation policies and regulations. As such, the Proposed Project would not conflict with any adopted energy conservation plans, and impacts would be less than significant.

7. Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The following section summarizes and incorporates by reference information from the Geo-Hazard Review, Proposed Art Complex Building, 1410 Pico Boulevard, Santa Monica College, City of Santa Monica, California, prepared by Geolabs-Westlake Village, dated March 13, 2020 (“”Geo-Hazard Review). The Geo-Hazard Review is included as Appendix C to this IS/MND.

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

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

Less Than Significant Impact. A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Geo-Hazard Review concluded that the Project Site contains no active or potentially active faults, nor is it within an Alquist-Priolo Earthquake Fault Zone. Therefore, the potential for ground rupture is considered to be very low.

The closest surface trace of an active fault to the Project Site is a portion of the Santa Monica Fault Line, located approximately 6,400 feet north of the Project Site.[19] As such, the Project Site is situated within the seismically active Southern California region and ground shaking is likely to occur due to earthquakes caused by movement along faults within the region. The Project Site could be subject to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project, provided that the geotechnical design criteria in the Geo-Hazard Review should be incorporated into the Proposed Project design. Sign off from the State of California Division of State Architect (DSA) would ensure that the Proposed Project meets the applicable performance measures. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's exacerbation of the existing environmental conditions. Thus, Proposed Project impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to

[19] *US Geological Survey Interactive Fault Map, website: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf, accessed February 2020.*

seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. However, the nearest earthquake fault, a portion of the Santa Monica Fault Line, is located 6,400 feet north of the Project Site. Nonetheless, the Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. However, as previously mentioned, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Therefore, the Project Site is considered suitable for the construction of the Proposed Project, provided that the geotechnical design criteria in the Geo-Hazard Review should be incorporated into the Proposed Project design. Sign off from the DSA would ensure that the Proposed Project meets the applicable performance measures. Impacts from seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is a condition where the soil undergoes continued deformation at a constant low residual stress due to the build-up of high porewater pressures. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity; sufficient groundwater to cause high pore pressures; and on the grain size, relative density, and confining pressures of the soil at the Project Site.

The Project Site is located in an area identified as not having a potential for liquefaction on the “State of California Seismic Hazard Zones Map for the Beverly Hills Quadrangle” nor mapped by Leighton and Associates in the Technical Background Report for the City of Santa Monica. Therefore, the potential for liquefaction is considered low.

The Project Site is considered to be suitable for the proposed construction from a geotechnical engineering standpoint, provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the DSA. Therefore, with compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant.

iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding.

The topography of SMC campus and immediate vicinity is very flat, with grade differentials typically on the order of a couple of feet. No evidence of landsliding was observed during the course of previous investigations throughout the campus. The Project Site is not located within a Seismic Hazard Zone for earthquake-induced landsliding. As such, the potential for landslides and slope stability hazards to adversely affect the Proposed Project is considered low. Therefore, no impact would occur.

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would constitute a geologic hazard to other properties by causing or accelerating instability from erosion or accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Grading and site preparation required for the Proposed Project would include approximately 12 feet of excavation for a partial basement level to house storage and mechanical equipment. Although development of the Proposed Project has the potential to result in the erosion of soils during grading, excavation, and construction activities, erosion would be reduced by implementation of applicable requirements, including the City's Urban Runoff Pollution Control Ordinance to minimize soil erosion impacts. In addition, the Project Site is almost entirely covered/developed with the existing building and impervious materials, prior to recent demolition activities, and is characterized by a flat topography. Construction of the Proposed Project's building would result in minimal soil exposure, and as such, the potential for erosion hazards is extremely low. Therefore, impacts with respect to soil erosion or the loss of soil would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geo-Hazard Review concluded that the potential hazards associated with liquefaction are low. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site are also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the

general lack of elevation difference across or adjacent to the Project Site. With the implementation of Building Code requirements as discussed above in Checklist Question 7 (a), the potential for geologic hazards would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features such as floor slabs or additional infill to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

Based on fill testing, the Geo-Hazard Report found that the on-site soils appear to be primarily derived from on-site soils and are comprised of medium brown, red brown and dark brown silty sand. The sand fraction is predominantly fine to medium grained. These soils are typically damp to moist and in a medium dense condition. Due to their undocumented status, the Geo-Hazard Report considered these soils inappropriate for foundational support. However, during construction, proper soil compaction and fill activities detailed in the Geo-Hazard Report would be incorporated into the building foundations and design. Thus, with incorporation of the recommendations provided in the Geo-Hazard Report and compliance with applicable Building Code requirements, a less than significant impact would occur related to expansive soil.

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

No Impact. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Santa Monica, which is served by a wastewater collection, conveyance and treatment system operated by the City of Santa Monica. No septic tanks or alternative disposal systems are neither necessary, nor are they proposed. Thus, no impact would occur.

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

Less Than Significant Impact with Mitigation. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb

paleontological resources or geologic features which presently exist within the Project Site.

The Geo-Hazard Report found no paleontological resources during the exploratory excavations. Since the Proposed Project would excavate up to 12 feet below grade for the construction of one subterranean level, the potential exists for discovery of paleontological resources. However, if paleontological resources are discovered during excavation, grading, or construction, DSA shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. The found deposits would be treated in accordance with federal, State, and local guidelines.

MM-PALEO-1: If construction or other Project personnel discover any potential fossils during construction, work at the discovery location shall cease in a 50-foot radius of the discovery until a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (2010) and curated with a certified repository.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and related projects in the project area. Potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, through the implementation of regulatory compliance measures and recommendations for site grading and foundation design in the Geotechnical Investigation, Project impacts would be less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

With respect to paleontological resources, adherence to applicable regulations regarding the reporting and handling of paleontological resources would ensure Project impacts to paleontological resources are reduced to less than significant levels. Because the discovery of paleontological resources would be geographically limited to the immediate area of the find, the potential for cumulative impact to occur with respect to paleontological resources would be less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology, soil, and paleontological resources impacts would be less than significant.

8. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF_3), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020

"business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[20] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[21] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017

[20] *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

[21] *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a Cap-and-Trade program as one of the strategies California will employ to reduce the GHG emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Additionally, SB 32 established a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the Cap-and-Trade Program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce GHGs from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes institutional uses and does not propose any industrial or high-emitting land uses. In July 2018, CARB recently announced that

greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal set by AB 32.[22]

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CAL Green Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CAL Green Code and other State-mandated laws and regulations. The CAL Green Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CAL Green Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CAL Green Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CAL Green Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CAL Green Code became mandatory on a statewide basis.

2014 Santa Monica Sustainable City Plan

The City of Santa Monica adopted the original Sustainable City Plan in 1994 and updated the Plan in 2014 (2014 SCP) to ensure that the City is able to meet its present environmental, economic, and social needs without compromising the ability of its future generations to do the same. The 2014 SCP is considered an advisory document that lays out nine goal areas: Resource Conservation, Environmental and Public Health, Transportation, Sustainable Local Economy, Open Space and Land Use, Housing, Community Education and Civic Participation, Human Dignity, and Arts and Culture, all of which help the City identify specific goals that comprise the core of the community vision and represent what the City must achieve in order to become a sustainable city. Indicators for each of the nine goal areas measure progress toward meeting that specific goal area, and specific targets have been created for many of the indicators. These indicators represent aggressive but achievable milestones for the City. Where

[22] *California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed March 2020.*

development of a specific target was determined not to be feasible or where limits on data and availability made it difficult to set a numerical target, a trend direction was used as a substitute.

Regarding specific targets for GHGs, the Resource Conservation goal area commits a specific target of reducing community GHG emissions by 20% below 1990 levels by 2020 and reduce corporate GHG emissions by 30% below 1990 levels by 2020; commits to increasing electricity from renewable energy to 50%; proposes 100% of new municipal buildings as LEED GOLD certification and 100% of existing municipal buildings achieving LEED Gold certification; a target of 100% of households as being within one-half mile of a high-quality transit service by 2020; a 10% reduction in vehicle use by 2020; 80% of the City's vehicle fleet using alternative fuels (and a modal split target of 60% who drive, minimum 25% who bike/walk/use transit, and 15% who bike and walk) by 2020.[23] The remaining goal areas regarding GHGs have unspecific targets and trend directions, such as increasing the percentages of energy efficiency and green construction certifications for residential and non-residential buildings; an upward trend in sustainable modes of transportation and the public's use of sustainable transportation; and a downward trend in Vehicle Miles Traveled (VMT), among others. No specific GHG significance thresholds are identified in this document.

City of Santa Monica Climate Action and Adaption Plan

In May 2019, the City of Santa Monica adopted the "Climate Action & Adaptation Plan: A 2030 Community Plan to Reduce Carbon Emissions & Become Climate Resilient" (CAAP). The CAAP builds off its success and legacy as a sustainable community to move closer to carbon neutrality, by establishing an interim goal of reducing carbon emissions 80 percent below 1990 levels by 2030. The CAAP focuses on eight objectives in three sectors to reduce emissions: Zero Net Carbon Buildings, Zero Waste, and Sustainable Mobility. The CAAP also focuses on community resilience to climate change through four sectors: Climate Ready Community, Water Self-Sufficiency, Coastal Flooding Preparedness, and Low Carbon Food and Ecosystems.

Between 1990 and 2015, Santa Monica reduced its emissions by 276.324 metric tons of carbon dioxide equivalents (MTCO2e) to achieve 20 percent below 1990 levels at a rate of 0.8 percent per year. In order to achieve an 80 percent reduction by 2030, Santa Monica would need to reduce total emission by about 929.693 MTCO2e, at a rate of over 4 percent per year, significantly increasing the scale and speed of reductions. This

[23] *City of Santa Monica, Sustainable City Plan, updated January 14, 2014, website: https://www.smgov.net/uploadedFiles/Departments/OSE/Categories/Sustainability/Sustainable-City-Plan.pdf, accessed February 2020.*

"bending of the carbon curve" is essential to meeting the Paris Agreement and avoiding worsened climate change impacts.

2016 RTP/SCS

On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). In June 2016, through Executive Order G-16-066, CARB accepted SCAG's Final 2016-2040 RTP/SCS as a GHG reduction plan.[24] Within the RTP, the SCS demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS sets forth a regional plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in High-Quality Transit Areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040 in the SCAG region, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.

SCAQMD

In October 2008, SCAQMD staff proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO_2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However,

[24] *California Air Resources Board, Executive Order G-16-066: Southern California Association of Governments (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 28, 2016, website: https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf*

SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. However, this group has not met since 2010.

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

Less Than Significant Impact. Neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing an institutional project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Santa Monica does not have an adopted quantitative threshold of significance for an institutional project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project. The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance-based standards for its determination. A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.

The California Supreme Court's decision published on November 30, 2015, in the Center for Biological Diversity v. California Department of Fish and Wildlife (62 Cal.4th

204) (also known as the Newhall Ranch Case) reviewed the methodology used to analyze GHG emissions in CEQA. The California Supreme Court suggested regulatory consistency as one pathway to compliance by stating that a lead agency might assess consistency with AB 32's goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The Court stated that a lead agency might assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, including statewide programs and local climate action plans or GHG emissions reduction plans. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. Importantly, the Court also suggested: "A lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions" (bright line threshold approach) if supported by substantial evidence."

For the Proposed Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Santa Monica. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions.

In the absence of any adopted numeric threshold, the significance of the Proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions and incorporates the recommended 3,000 metric tons of CO_2e per year threshold. While this screening threshold was never adopted by the SCAQMD Board, the City has elected to apply this threshold in its environmental review of development projects.

For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2016–2040 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by the 2017 Scoping Plan and subsequent updates SB 375, SCAG's 2016 RTP/SCS, the California Green Building Code, and the California Community Colleges Board of Governors Energy and Sustainability Policy.

Construction

Construction of the Proposed Project would emit GHGs through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 24-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table 4.8, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 4.8, the total GHG emissions from construction activities related to the Proposed Project would be approximately 951.09 metric tons, with the greatest annual emissions occurring in 2022.

Table 4.8
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2021	369.08
2022	416.02
2023	165.99
Total Construction GHG Emissions	**951.09**

[a] *Construction CO_2 values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix D, Greenhouse Gas Emissions Worksheets.*

Operation

Baseline GHG Emissions

The Proposed Project is currently a college-affiliated staff parking lot with vacant land. The surface parking lot accommodates existing parking demand from the main college campus. Therefore, this analysis assumes there are no existing greenhouse gas emissions from the Project Site as the vehicle parking at the Project Site are originating from other land uses in the area.

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project's compliance with the California Community Colleges Board of Governors Energy and Sustainability Policy and other mitigating features that would be effective in reducing

GHG emissions, such as the Project Site being an infill lot and its proximity to transit and walking distance to a major employment center. The Proposed Project's emissions were calculated using CalEEMod with GHG reduction measures. As shown in Table 4.9, the Proposed Project scenario with GHG reduction measures would result in a net increase of 2.965.22 CO_2e MTY.

For purposes of this comparison it should be noted that the Proposed Project's structural and operational features include elements such as installing energy efficient lighting, low flow plumbing fixtures, and solar photovoltaic panels, where appropriate. The Proposed Project would comply with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32. Additionally, the Proposed Project would not exceed the SCAQMD proposed non-industrial screening threshold of 3,000 $MTCO_2e$/year. While neither SCAQMD nor the City have adopted this screening threshold, the fact the Proposed Project's GHG emissions are below the threshold provides further substantial evidence that the Proposed Project's GHG impacts are less than significant.

Table 4.9
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions *(Metric Tons per Year)*
Area	0.06
Energy	87.37
Mobile (Motor Vehicles)	2,689.40
Stationary	4.59
Waste	106.40
Water	45.70
Construction Emissions [b]	31.70
Total GHG Emissions:	**2,965.22**

Notes:
[a] *The Percent Reduction is not a quantitative threshold of significance, but shows the efficacy of the Project's compliance with the various regulations, plans and policies that have been adopted with the intent of reducing GHG emissions.*
[b] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Project.*
Calculation data and results provided in Appendix D, Greenhouse Gas Emissions Worksheets.

Plan Consistency

Consistency with SB 32 Scoping Plan

While the Scoping Plan provided several broad goals and policies aimed at reducing greenhouse gasses on a statewide level, some of the policies are applicable or interrelated to the development of specific land use projects at the local level. Provided below is a consistency analysis of the Scoping Plan's policies that are applicable or indirectly applicable to the Proposed Project.

Energy Efficiency. The Proposed Project would be consistent with the Scoping Plan's policy to (a) maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Proposed Project would be designed and constructed to meet the California Community Colleges Board of Governors Energy and Sustainability Policy at the LEED Silver certification level or equivalent by including several measures designed to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures, low-flow plumbing fixtures, and sustainable building materials.

Renewables Portfolio Standard. The Proposed Project would not impede the Scoping Plan's policy to achieve 33 percent renewable energy mix statewide. While this policy is not directly applicable to the Proposed Project, the Proposed Project would use energy from the Clean Power Alliance, which has goals to diversify almost its entire portfolio of energy sources from clean renewable energy.

Green Building Strategy. The Proposed Project would be consistent with the Scoping Plan's policy to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The Proposed Project would be designed and constructed to meet California Community Colleges Board of Governors Energy and Sustainability Policy standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low-flow plumbing fixtures, incorporating solar photovoltaic panels where appropriate, and obtaining an energy efficiency rating at the LEED® Silver level or equivalent.

Recycling and Waste. The Proposed Project would be consistent with the Scoping Plan's policy to reduce methane emissions at landfills, increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling, and to move toward zero waste. The Proposed Project would result in a less than significant impact on landfill capacity. (See response to Checklist Question 20, below). It would meet the City's 95 percent waste diversion rate goal and comply with

the City's Zero Waste Program, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.

Water. The Proposed Project would be consistent with the Scoping Plan's policy to continue efficiency programs and use cleaner energy sources to move and treat water. The Proposed Project would use water-efficient low-flow plumbing fixtures that would reduce the demand for potable water on site. As such, the Proposed Project's conservation efforts would be achieved by complying with the Green Building Code and would further reduce the demands for treating potable water and wastewater.

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use, and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS is provided further below.

Consistency with 2016 RTP/SCS

The Proposed Project would be consistent with the following key GHG reduction strategies in SCAG's 2016 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Provide compact growth in areas accessible to transit;
- Provide jobs and housing closer to transit;
- Focus new housing and job growth in High Quality Transit Areas (HQTA); and
- Provide biking and walking infrastructure to improve active transportation options, transit access.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new institutional land uses within a High Quality Transit Area (HQTA). The Proposed Project would provide students and staff with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. Several bicycle facilities serve the SMC Main Campus. Pico Boulevard is marked with sharrows on the segments east and west of 16th Street. There is an eastbound green Class II bike lane on Pearl Street adjacent to the Main Campus, from 20th Street to 16th Street, the bike lane continues further east past 14th Street, but it is not green. In the westbound direction adjacent to campus there are shared lane markings (i.e., sharrows) from Lot 1

to 17th Street and there is a green Class II bike lane from 17th Street to 16th Street, and past 16th Street as a standard Class II facility. 14th Street has a bike lane in each direction north of the Project site, south of the Project site there is a bike lane in the southbound direction and a Class III bike facility in the northbound direction. The project will accommodate bicycle spaces on site. Santa Monica College has a well-established transportation sustainability plan which has been in place for over 9 years that encompasses the main campus and satellite sites and is available to all students and staff. This plan will be extended to include the Art Complex Replacement Project. These and other measures such as conformance with SMC's transportation sustainability plan would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016 RTP/SCS.

Consistency with the 2019 California Energy Code

In accordance with the California Community Colleges Board of Governors Energy and Sustainability Policy, the Proposed Project would be designed to exceed Title 24, Part 6 Energy Code by at least 15%. Thus, he Proposed Project would be consistent with the 2019 California Energy Code with respect to reducing greenhouse gas emissions.

Consistency with the Santa Monica 2020 Energy Reach Code

The City of Santa Monica's Energy and Green Building Reach Codes are provided in Section 8.36 and Section 8.106 of the SMMC. While not directly applicable to the Proposed Project, the *2020 Energy Reach Code* requires the use of energy conservation measures, beyond those required by Title 24 of the California Administrative Code. The Proposed Project would be built to comply with the 2019 California Energy Code requirements and California Community Colleges Board of Governors Energy and Sustainability Policy with respect to energy efficiency and water conservation. The College will be required to submit the Proposed Project's building plans to the Division of State Architect (DSA) for structural safety, access compliance, and fire and life safety approvals. Therefore, while not subject to local building code standards, the Proposed Project would be compliant with the intent of the *2020 Energy Reach* Code with respect to energy efficiency.

As demonstrated above, the Proposed Project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the 2019 Title 24 California Energy Code (CAL Green Building Efficiency Standards for Non-Residential Buildings), the California Community Colleges Board of Governors Energy and Sustainability Policy, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

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

Less Than Significant Impact. As described above and in response to Checklist Question 8(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the 2019 California Energy Code, the California Community Colleges Board of Governors Energy and Sustainability Policy, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030 and 80 percent below 1990 levels by 2050. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Pursuant to the Office of Planning and Research's recently published Discussion Draft on CEQA and Climate Change (December 2018), in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of a project's emissions to the effects of climate change. It is the increased accumulation of GHG emissions from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on climate change. As concluded above, the Proposed Project's generation of GHG emissions would not exceed SCAQMD recommended 3,000 $MTCO_2$/year non-industrial threshold. Furthermore, the Proposed Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the state and College's goals of reducing GHG emissions, including but not limited to the California Community Colleges Board of Governors Energy and Sustainability Policy. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

9. Hazards and Hazardous Materials

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

The following section summarizes and incorporates the reference information from the following site-specific technical reports:

- Hazardous Materials Assessment, Asbestos and Lead, 2019 14th Street, Santa Monica, CA 90405, prepared by Ellis Environmental Management, Inc., dated March 2017 ("HazMat Assessment"); and
- State Water Resources Control Board, GeoTracker Case Summary for 1410 Pico Boulevard, Santa Monica, CA 90405 (Regional Board Case Number 904050216).

All reports are included in Appendix E to this IS/MND.

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

Less Than Significant Impact. A significant impact may occur if a project would involve the use for or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a two-story, 20,720 square-foot Art Complex building on a lot that has been previously developed. Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities.

During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes would routinely be transported to the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements.

Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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

Less Than Significant With Mitigation Incorporated. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

2019 and 2023 14th Street

A HazMat Assessment was performed on the portion of the Project Site, located at 2019 and 2023 14th Street, to inspect the former YWCA Shelter and affiliated buildings for possible asbestos-containing building materials (ACMs) and lead-based materials. Asbestos was detected (or was presumed present) in the building, and lead was identified in portions of each building. However, buildings located on the parcel at 2019 14th Street have since been demolished. This portion of the Project Site is currently vacant and undeveloped, along with the adjacent parcel at 2023 14th Street, which once comprised a small section of surface parking lot for the Shelter. Prior to the issuance of the demolition permit, the Applicant was required to provide a letter to the DSA from a qualified asbestos abatement consultant that no ACMs are present in the Project Site buildings. If ACMs were found to be present, removal and disposal would be in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other state and federal regulations. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished. Since the Applicant was required to be compliant with SCAQMD regarding ACMs removal, hazardous materials impacts related to exposure to asbestos would be less than significant.

Additionally, prior to the issuance of any permit for demolition or alteration of the existing structure(s), a lead-based paint survey was required to be performed to the satisfaction of the DSA. Standard handling and disposal practices are implemented pursuant to OSHA regulations. A qualified lead-based paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing

lead paint abatement. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Since the Proposed Project is required to comply with these mandatory state and federal regulations, the lead-based paint on-site was to be handled properly, and impacts associated with the exposure to lead-based paint would be less than significant.

As such, the removal of the ACMs and lead-based materials were removed with compliance with applicable state and federal regulatory compliance measures and potential impacts associated with the release of hazardous materials from 2019 and 2023 14th Street are considered less than significant.

1410 Pico Boulevard

Based on the Department of Toxic Substances Control DTSC's EnviroStor database, the portion of the Project Site, located at 1410 W. Pico Boulevard, underwent abatement from a historic release of "non-petroleum hydrocarbon or other solvent" to the soil. This property once functioned as a gasoline station with underground storage tanks. The Project Site was reported with a leaking underground storage tank (LUST), and its case opened on January 12, 1999 and underwent cleanup. The SWRCB then closed the case on January 21, 2000. Although the case is closed, since the Proposed Project would excavate up to 12 feet below grade for one level of subterranean, Mitigation Measure HAZ-1 would be implemented in order to ensure contaminated soils would be segregated from clean soils and properly disposed of during the excavation and construction activities. As such, the Proposed Project's compliance with mandatory state and federal regulatory compliance measures and implementation of Mitigation Measures HAZ-1 would ensure that potential impacts associated with the release of a hazardous material would be reduced to less than significant levels.

Mitigation Measure:

HAZ-1: Soil Management Plan

- A Soil Management Plan shall be prepared and approved by the City prior to construction activities pursuant to SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) to provide a framework under which work can proceed safely and contaminated soils and groundwater can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. The plan shall include all necessary procedures to ensure that

excavated materials and fluids generated during construction are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations. The plan shall include the following information.

- Step-by-step procedures for evaluation, handling, stockpiling, storage, testing, and disposal of excavated material, including criteria for reuse and offsite disposal. All excavated materials shall be inspected prior to initial stockpiling, and spoils that are visibly stained and/or have a noticeable odor shall be stockpiled separately to minimize the amount of material that may require special handling.
- To ensure appropriate containment of excavated materials, excavated affected soils that exceed state hazardous waste criteria would be placed in lined, sealed containers or wrapped and enclosed by tarps and transported by licensed hazardous waste haulers and disposed of at a licensed hazardous waste management facility approved for the specific hazardous materials to be disposed of. The contractor shall follow all procedural requirements and regulations for proper removal and disposal of affected soils.
- Procedures to be implemented if unknown subsurface conditions or contamination are encountered, such as previously unreported tanks, wells, or contaminated soils.
- Detailed control measures for use and storage of hazardous materials to prevent the release of pollutants to the environment, and emergency procedures for the containment and cleanup of accidental releases of hazardous materials to minimize the impacts of any such release. These procedures shall also include reporting requirements in the event of a reportable spill or other emergency incident. At a minimum, the City or its contractor shall notify applicable agencies in accordance with guidance from the Fire Department and RWQCB.
- Procedures for containment, handling and disposal of groundwater generated from construction dewatering, the method used to analyze groundwater for hazardous materials likely to be encountered at specific locations and the appropriate treatment and/or disposal methods.

- Prior to the issuance of any building permit, the Applicant shall obtain a sign-off from the Fire Department and RWQCB indicating that all on-site hazardous materials, including contamination of the soil and groundwater, have been

suitably remediated to an acceptable standard of risk for the future development under the Proposed Project.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard (i.e., such as exposure to lead based paint, polychlorinated biphenyls, or asbestos). The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design would reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Two schools are located within one-quarter mile of the Project Site: 1) John Adams Middle School, located 0.25 mile southeast of the Project Site, and 2) Maple Tree Academy, a preschool, toddler, and infant care site, located 0.22 mile northwest of the Project Site. Localized construction impacts associated with noise, dust, and localized air quality emissions, and construction traffic/hauling activities, generally occur within an area of 500 feet or less of a project site. Since no schools for minor-aged children are located within 500 feet from the Project Site, the construction activities from the Proposed Project would not create a hazard to any nearby schools. Therefore, construction impacts to nearby schools would be less than significant.

Further, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for maintenance and janitorial purposes would be present at the Project Site, and the acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements. The operational activities of the Proposed Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, operational impacts on nearby schools would be less than significant.

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

Less Than Significant With Mitigation Incorporated. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The portion of the Project Site located at 2019 and 2023 14th Street is not registered on a list of hazardous materials sites. The portion of the Project Site located at 1410 Pico Boulevard is included on a list of hazardous materials sites, specifically the California State Water Resources Control Board GeoTracker website. As of January 2000, the cleanup status of 1410 Pico Boulevard was completed, and the case was closed. The Proposed Project's compliance with mandatory state and federal regulatory compliance measures and implementation of Mitigation Measures HAZ-1, above, would ensure that potential impacts associated with the release of a hazardous materials would be reduced to less than significant levels.

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

Less Than Significant Impact. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport and subject to a safety hazard. The closest public airport to the Project Site is the Santa Monica Airport, located approximately one mile southeast of the Project Site. The Project Site is not located in an airport hazard zone or within an airport land use plan.[25] Although the Proposed Project is not located within the Santa Monica Airport Influence Area, it does fall within the FAA noticing requirements to confirm the building would not obstruct with flight patterns. As such, the Applicant would be required to submit an FAA Form 7460-1, Notice of Proposed Construction to the FAA 45 days prior to commencing construction. The Project proposes to construct a two-story Art Complex Replacement building and may include excavation activities to

[25] *The Los Angeles County Department of Regional Planning, Airport Land Use Commission (ALUC), Airports, Plans, and Maps website: http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf, accessed February 2020.*

construct one level below grade as basement storage space. The proposed height of the Proposed Project would be approximately 40 feet above grade, which is substantially consistent with the heights of other buildings in the area, such as the Santa Monica College Office of Campus and Alumni Relations building, the Santa Monica College Foundation building, and SMC's Lot 4 Parking Structure. As such, the Proposed Project would not negatively impact air navigation or the safety of people residing or working in the Project Site. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The Project Site is not located in a disaster route according to the Los Angeles County Department of Public Works Disaster Route Map of the City of Santa Monica.[26] Development of the Project Site may require temporary and intermittent partial street closures due to construction activities along Pico Boulevard and 14th Street. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

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

No Impact. The Project Site is located in an urbanized area of Santa Monica and does not include wildlands or high fire hazard terrain or vegetation. According to CalFire, Office of the State Fire Marshall, Santa Monica is not listed among the cities for which CalFire has made recommendations on Very High Fire Hazard Severity Zones.[27] The

[26] *Los Angeles County, Department of Public Works, Disaster Route Map of the City of Santa Monica, website: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/santa%20monica.pdf. Accessed February 2020.*

[27] *CalFire, Office of the State Fire Marshal, Fire Hazard Severity Zone Maps, website: https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed January 2020.*

City of Santa Monica is not located in a wildfire hazard zone,[28] and no impacts from wildland fires are expected to occur.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with the related projects identified in Section 3, Project Description, has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Santa Monica. However, the potential impact associated with the Proposed Project would be less than significant with adherence to all applicable regulations and, therefore, would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, State, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, State, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

10. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

[28] *CalFire, Office of the State Fire Marshal, Fire Hazard Severity Zone Maps, State Responsibility Area (SRA), adopted November 2007, PDF. Website: https://osfm.fire.ca.gov/media/6636/fhszs_map.pdf, accessed January 2020.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State

Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB).

Santa Monica's water comes from three sources: groundwater, purchased water, and collected runoff. The City's groundwater comes from the Santa Monica Basin; the City's purchased water comes from the Colorado River and the San Joaquin Delta through the Southern California Metropolitan Water District; and runoff comes from water collected from the City's storm drains. Stormwater and urban (dry weather) runoff are considered the number one source of pollution into the Santa Monica Bay, and the City of Santa Monica Urban Runoff Recycling Facility (SMURFF) treats polluted urban runoff water. Applicable regulations include the Santa Monica Urban Runoff Pollution Ordinance (SMMC Chapter 7.10) and Best Management Practices (BMPs), in accordance with the Ordinance, to control the discharge of pollutants in stormwater runoff as a result of construction activities. During construction, the Proposed Project would be required to implement BMPs to prevent the transport of sediments from stormwater runoff from the Project Site, per CAL Green Section 5.106.1.2.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

The Applicant would not be required to obtain coverage under the SWRCB's NPDES Construction General Permit. Under the Construction General Permit Order 2009-0009-DWQ, dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. However, since construction activity would not disturb one or more acres of soil and the Project Site is not a part of a larger common plan of development that in total disturbs one or more acres, the Applicant is therefore not required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ.

A Stormwater Pollution Prevention Plan, which identifies Best Management Practices (BMPs) to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction

activities is also part of the compliance with the Construction General Permit. Since the Applicant is not required to obtain a Construction General Permit, the Applicant would therefore also not be required to implement a SWPPP. However, during construction, the Proposed Project would still be required to implement BMPs to prevent the transport of sediments from stormwater runoff from the Project Site, per CAL Green Section 5.106.1.2, as well as the abovementioned Santa Monica Urban Runoff Pollution Ordinance (SMMC Chapter 7.10).

Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. As such, the implementation of the code-required SWPPP and compliance with Santa Monica Urban Runoff Pollution Ordinance (SMMC Chapter 7.10) would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

The northern portion of the Project Site is covered with impervious surfaces with the exception of some landscaping (approximately 40 percent of entire Project Site), and the southern portion of the Project Site is currently covered with pervious surfaces due to the recent demolition of the YWCA Cottage House and Shelter House. Thus, the surface water runoff from the northern portion of the Proposed Project is directed to adjacent storm drains located at the intersection of Pico Boulevard and 14th Street[29] where it is then directed to the Santa Monica Urban Runoff Recycling Facility (SMURRF). Following completion of construction, the entire Proposed Project would increase the area of impervious surface resulting in an increase in runoff compared to existing conditions. The Proposed Project would continue to generate surface water runoff, and runoff would be directed to the same existing stormwater inlets. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

The Proposed Project will comply with the Santa Monica Urban Runoff Pollution Ordinance (SMMC Chapter 7.10), in which compliance would reduce the runoff volume from the Project Site and maximize on-site storage of runoff and use of rainwater and stormwater through a hierarchy of construction and post-construction BMP strategies.

[29] *City of Santa Monica Open Maps and GIS Data, SM Map – Public Works Mapping, website: https://www.santamonica.gov/isd/gis, accessed February 2020.*

An Urban Runoff Mitigation Plan, in which mandatory BMPs would be identified, would be required to demonstrate that the Project would store and use (for non-portable purposes), infiltrate, or evapotranspire project-generated runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. The Urban Runoff Mitigation Plan would be implemented throughout the operational life of the Project to reduce the discharge of pollutant runoff from the Project Site. Compliance with CAL Green Section 5.106.1.2 would also ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, code and requirement compliance would ensure operational water quality impacts and waste discharge requirements would be less than significant.

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

Less Than Significant Impact. A project would have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed in response to Checklist Question 10(a) the Project Site is approximately 40 percent impervious. As such, 40 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. The Proposed Project would excavate soils approximately 12 feet beneath the Project Site to allow for the construction of the proposed one level of subterranean space. The Geo-Hazard Report concluded that groundwater was not encountered during recent excavations up to 50 feet below grade. The deepest exploration on the Main Campus for the Student Services building did not encounter groundwater at its maximum depth of 100 feet. A depth to groundwater map prepared by Leighton and Associates indicated that the groundwater is approximately 110 feet below ground surface in the vicinity of Santa Monica College. Because the depth of groundwater is lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Section 7.18 of the SMMC, Sustainable Groundwater Management Ordinance, would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

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

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial erosion, siltation, pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. The Project Site is located in a highly urbanized area within the City of Santa Monica, and no streams or river courses are located on the Project vicinity. The Proposed Project is an infill development project on a site that is currently 40 percent impervious. Implementation of the Proposed Project would increase site runoff in the local drainage patterns. However, implementation of an LID Plan would require stormwater BMPs to retain or treat the first runoff from a storm event producing ¾ inch of rainfall in a 24-hour storm event. As such, the volume of surface water runoff would not substantially increase above current conditions, if at all.

Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would comply with relevant provisions of Chapter 7.10 of the SMMC, which addresses a Storm Water Pollution Prevention Plan (SWPPP) and an Erosion and Sediment Control Plan (ESCP), which would be prepared and implemented for the Proposed Project. The SWPPP and ESCP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. This process and associated protocols would ensure that impacts to soil erosion and siltation are less than significant levels. Regulatory compliance measures would ensure that runoff leaving the Project Site would not result in substantial erosion or siltation during the construction and operational phases of the Proposed Project. Therefore, impacts to substantial erosion or siltation on- or off-site would be less than significant.

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

Less Than Significant Impact. A project would have a significant impact on surface water hydrology (and the rate and amount of surface water) if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow or would create or contribute

runoff water that would exceed the capacity of existing or planned stormwater drainage systems. The Project Site is located in a highly urbanized area of Santa Monica, and no streams or river courses are located on or within the Project vicinity. The majority of the Project Site is impervious. Implementation of the Proposed Project would not result in any changes in the local drainage patterns. Implementation of BMPs as required per CAL Green Section 5.106.1.2 and compliance with the Santa Monica Urban Runoff Pollution Ordinance, however, would reduce the amount of surface water runoff after storm events, as the Proposed Project would be required to mitigate (use, infiltrate, or evapotranspire) the runoff from a storm event producing ¾ inch of rainfall in a 24-hour storm event. Therefore, the Proposed Project would not increase the rate or amount of flow from the Project Site or create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which would exceed the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

The Project Site is currently developed, and a majority of the surface water is directed off site to the adjacent storm drain inlets along Pico Boulevard and 14th Street. Through code and regulatory compliance previously mentioned, BMPs are still required for the Proposed Project design plans. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with the Santa Monica Urban Runoff Pollution Ordinance in Chapter 7.10 of the SMMC.

Storm water retention will be required as part of the LID/SUSMP implementation features. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. Accordingly, the Proposed Project will be required to demonstrate compliance with the LID Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour storm event, which will reduce the Proposed Project's impact to the stormwater infrastructure. As discussed above in response to Checklist Question 10 (b), the Geotechnical Investigation concluded based on conditions encountered at the time of exploration,

groundwater is not anticipated during construction of the one-level subterranean space. Therefore, the Proposed Project would not provide substantial additional sources of polluted runoff, and potential impacts to surface water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone and would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.[30] A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Map No. 06037C1590F, dated September 26, 2008, indicates that the site is located in an area designated as "Zone X", described as "Areas determined to be outside the 0.2 percent flood plain."[31] The Project Site is located in a highly urbanized area and, as no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

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

No Impact. The Project Site is not located in a flood hazard, tsunami or seiche zone. See response to Checklist Question X (c)(iv) regarding flood hazards. Therefore, no impact would occur.

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

Less Than Significant Impact. A significant water quality impact could occur if a project is not consistent with the Los Angeles Regional Water Quality Control Plan or the Sustainable Groundwater Management Act (SGMA), or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of a Groundwater Sustainability Plan.

In 2014, the California Legislature and Governor passed the SGMA, which encourages local agencies to take a leading role in managing their local groundwater resources. The SGMA, a collection of three bills (AB 1739, SB 1168, and SB 1319), provides local agencies with the framework necessary to sustainably manage medium and high priority groundwater basins, as described by the act, with the goal to bring the basins

[30] *Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 06037C1590F, September 26, 2008, website: https://msc.fema.gov/portal/, accessed February 2020.*

[31] *Ibid.*

into balance in 20 years. The intent of SGMA is to require sustainable groundwater management practices statewide, which will provide a buffer against drought and climate change. The California Department of Water Resources (DWR) has prioritized all groundwater basins according to certain criteria established in the California Water Code. The rankings are very low, low, medium, and high. SGMA compliance requires that local agencies form Groundwater Sustainability Agencies (GSAs) for medium- and high-priority groundwater basins no later than June 30, 2017 and adopt a Groundwater Sustainability Plan (GSP) no later than January 31, 2022. Currently, the Project Site is located within the Santa Monica Basin, which is classified as a medium priority groundwater basin. The Santa Monica Basin Groundwater Sustainability Agency (SMBGSA) was formed in 2017 in accordance with the SGMA, which is responsible for developing a GSP. Therefore, the SMBGSA will hold quarterly public workshops to submit a Santa Monica Basin GSP to the California DWR by January 2022. Nevertheless, as discussed above, adherence to Chapter 7.10 of the SMMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

The applicable water quality control plan applicable to the Proposed Project is the LARWQCB Water Quality Control Plan for the Santa Monica Basin, which was adopted on June 13, 1994. The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. As discussed previously under Question 10(a), the Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Proposed Project. The use of these substances would comply with State health codes and regulations. Further, the Proposed Project would comply with all federal, state and local regulations governing stormwater discharge. Additionally, the Proposed Project would comply with SMMC Section 7.10 and all related laws and regulations pertaining to stormwater runoff and water quality. Therefore, the Proposed Project would not include potential sources of water pollutants that would have the potential to substantially degrade water quality, and impacts to water quality would be less than significant.

As discussed within this section, the Proposed Project is not subject to a Groundwater Sustainability Plan and would not conflict with or obstruct implementation of the Water Quality Control Plan for the Los Angeles Region. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding areas are served by the existing Santa Monica drainage system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage system. It is likely that most, if not all, of the related projects in the Project vicinity would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related project sites, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Santa Monica Urban Runoff Pollution Ordinance, and City Watershed Management Plan, each related project would implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour storm event. Mandatory structural BMPs in accordance with the Urban Runoff Pollution Ordinance and Urban Runoff Mitigation Plan, therefore, result in a cumulative reduction of surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

11. Land Use and Planning

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

a) Physically divide an established community?

No Impact. A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within

that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located within a developed area of the City of Santa Monica. Land uses to the immediate north, across Pico Boulevard, include the Santa Monica Woodlawn Cemetery, Mausoleum, and Mortuary. Land uses to the immediate east include the Santa Monica College Office of Campus and Alumni Relations, the Santa Monica College Foundation, and single-family residential. Land uses to the immediate south include single-family residential. Land uses to the immediate west include low-density multi-family residential, the Palm Motel, and a Chevron gas station. In addition to being located adjacent to two SMC-affiliated buildings, the Project Site is located one street west of the college Main Campus and is thus compatible with the existing physical arrangement of the properties within the vicinity of the Project Site. No separation of uses or disruption of access between land use types would occur as a result of the Proposed Project. The Proposed Project would construct a two-story Art Complex Replacement building, which would not physically divide an established community. Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). At the local level, development of the Project Site is guided by the General Plan of the City of Santa Monica, the LUCE, and the SMMC, all of which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. With the approval of the Amendment to the SMC Career and Educational Facilities Master Plan (2010 Update) to incorporate parcels (APN 4284-034-014 and APN 4284-034-004), the Proposed Project would conform to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Section 3, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the 2016 AQMP.

SCAG Regional Comprehensive Plan and Guide

The Project Site is located within the six-county region that comprises the SCAG planning area. On April 7, 2016, SCAG adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life (2016 RTP/SCS). The 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities.

The Proposed Project would be consistent with the goals and policies set forth in the 2016 RTP/SCS, as the Proposed Project would redevelop an underutilized site with an institutional project that is easily accessible and served by mass transit. Furthermore, the Proposed Project would not result in an increase of students or faculty, therefore, the Proposed Project would be consistent with SCAG's growth projections.

Additionally, the Art Program is currently dispersed over several locations, including the older Art Complex buildings on the Main Campus and a Ceramics Building on the Airport Arts Campus south of the Santa Monica Airport. As the current Art Program is split, consolidating the Art Program into one building would better locate all students and faculty closer to the College main campus, which, in turn, would provide students and faculty with better access to campus resources. Because the Art Program is proposed to be in one location only, this would have the potential of helping negate

commute times for any students and faculty who, out of previous necessity from the split locations of the Art Program, needed to drive from one location to the other to attend or teach other classes.

Local Plans

Development within the City of Santa Monica limits is normally subject to the land use regulations of the City of Santa Monica General Plan and the City of Santa Monica Zoning Ordinance (City Zoning Ordinance). The City of Santa Monica General Plan Land Use and Circulation Element (LUCE) also provides guidelines on land uses issues and planning policy for development projects location within the City. However, it should be noted that the Main Campus and other SMC-affiliated campuses are controlled and operated by SMC. SMC operates under the provisions of Section 53094 of the California Government Code, which provides that school districts may override local zoning regulations except as to certain non-classroom facilities. Nevertheless, the following land use analysis is presented to disclose the Proposed Project's consistency with the local land use and zoning regulations.

Santa Monica Land Use and Circulation Element (LUCE)

The Santa Monica Land Use and Circulation Element was adopted July 6, 2010 and revised July 25, 2017. The LUCE is divided into eight residential neighborhoods: North of Montana, Wilshire-Montana, Pico, Sunset Park, Ocean Park, Mid City, Northeast, and Downtown. The Project Site is specifically located within the Sunset Park Neighborhood, adjacent to the border of the Pico Neighborhood. The Sunset Park Neighborhood is characterized by orderly, single-family homes, a limited number of multi-family buildings, elementary schools, neighborhood-serving restaurants, and two grocery stores. The Pico Neighborhood is characterized by an ethnically diverse resident base of both single-family and multi-family development as well as home to the College main campus. In addition, the Project Site is located along the Pico Boulevard commercial corridor, which is considered in the LUCE as an important connection between West Los Angeles, Santa Monica College, Downtown Santa Monica, and the Pacific Ocean, and it is characterized by neighborhood-serving commercial uses.

Table 4.10, Project Consistency with the Goals and Policies of the Santa Monica Land Use and Circulation Element, below outlines the Proposed Project's consistency with the applicable goals and policies of the LUCE. As shown in Table 4.10, the Proposed Project is consistent with the goals and policies of the LUCE. As a result, the Proposed Project would be consistent with the LUCE's vision for the Sunset Park neighborhood, and a less than significant impact would result.

Table 4.10
Project Consistency with Applicable Goals and Policies of the Santa Monica Land Use and Circulation Element

Objective / Policy	Project Consistency Analysis
LUCE Goals and Policies	
GOAL CE3: Foster opportunities to support the thriving Santa Monica creative arts community and ensure that artists continue to create within Santa Monica.	**No Conflict.** The Proposed Project would replace SMC's aging Art Program Complex with a modern, centralized arts complex that will facilitate education in the creative arts and help develop, train and educate artists. Therefore, the Proposed Project would not conflict with this goal.
Policy CE3.5 Encourage opportunities to foster communication and leverage partnerships between the City and other institutions and organizations for innovative cultural programming and creative arts production.	**No Conflict.** The Proposed Project will provide infrastructure such as classrooms and studio space that could potentially be used as part of partnership programs with the City and other institutions to provide arts education to the public, foster creativity, and encourage the public to become involved with the production of creative arts. Therefore, the Proposed Project would not conflict with this policy
GOAL CE4: Increase cultural access to a wide variety of cultural programs for all ages.	**No Conflict.** SMC's Arts Program hosts student and faculty art shows and exhibits art by local, national, and international artists. The Proposed Project's enhanced art facilities will help SMC continue to provide quality cultural programming for the public. Therefore, the Proposed Project would not conflict with this goal.
Policy CE4.1 Facilitate land use opportunities for major new arts and cultural festivals as well as small-scale festivals or showcases that highlight the arts and culture.	**No Conflict.** The Proposed Project would help facilitate the production of works of art by local artists that could be showcased throughout the City. In addition to classroom instruction, the Proposed Project's classrooms and studio space could be used to exhibit art at events open to the public. Therefore, the Proposed Project would not conflict with this policy.
Policy CE4.2 Encourage land uses that provide accessibility for residents of all ages to arts and cultural programming in both existing venues and new developments.	**No Conflict.** The educational program that would be facilitated by the Proposed Project would allow Santa Monica residents interested in arts education to take classes in a high quality, modern, centralized facility close to their homes. The Proposed Program would also provide a potential venue for City residents of all ages to gain exposure to the creative arts. Therefore, the Proposed Project would not conflict with this policy.
GOAL CE12: Support the SMMUSD and Santa Monica College capital planning and implementation in recognition of their important role in the City.	**No Conflict.** The Proposed Project is an important part of SMC's long-term improvement plans and City support is crucial to realizing the College's vision. Therefore, the Proposed Project would not conflict with this goal.

Policy CE12.2 Provide guidance based on LUCE principles and encourage implementation of SMC's campus modernization and renovation plans.	**No Conflict.** The Proposed Project is necessary to modernize SMC's Arts Program and is consistent with numerous LUCE principles. Therefore, the Proposed Project would not conflict with this policy.
Policy CE12.3 Maintain a collaborative working relationship with the SMMUSD and SMC to address issues of mutual concern.	**No Conflict.** The provision of improved arts education and programming is an issue of mutual concern to SMC and the City. While the Proposed Project is exempt from the City's Zoning Ordinance, collaboration with various City agencies will be an ongoing aspect of the Project's successful completion and operation. Therefore, the Proposed Project would not conflict with this policy.
Policy CE13.2 Work with SMC to explore facility development opportunities with mutual benefits to the college and the City.	**No Conflict.** Development of the Proposed Project will be mutually beneficial to SMC and the City, as it will provide a modern educational facility to SMC students, including those who are Santa Monica residents, and facilitate the cultural programming and the creation of works of art that can be enjoyed by all residents of the City. Therefore, the Proposed Project would not conflict with this policy.
GOAL CE14: Increase use of transit, walking and bicycling as an alternative to the automobile for students and employees of the city's schools and colleges.	**No Conflict.** The Proposed Project would concentrate new development within a half of a mile (walking distance) of several well-serviced Metro and Santa Monica BBB bus lines, providing opportunities for students and employees to reduce vehicle travel. The Project Site is also located less than a mile from the Metro E Line 17th St./SMC station. Therefore, the Proposed Project would not conflict with this goal.
Policy CE 14.1 Encourage and support efforts to increase transit ridership, walking and bicycling to educational facilities, reducing vehicle trips.	**No Conflict.** As noted above, the Project site is located in close proximity to various public transit options. The Project site is also within walking or biking distance for many residents of the Pico and Sunset Park neighborhoods. Therefore, the Proposed Project would not conflict with this policy.
Policy CE14.4 Work with and support SMC and the SMMUSD in developing and implementing a TDM program to reduce vehicle trips to and between satellite campuses, potentially including bus system enhancements and/or a universal bus pass program with the Big Blue Bus to increase transit ridership.	**No Conflict.** By eliminating the Ceramics Building on the Airport Arts Campus, the Proposed Project would consolidate SMC's Arts Program at one location and eliminate the need for arts students to travel between satellite campuses. The Proposed Project would also conform with SMC's TDM Program, further promoting a reduction in vehicle miles traveled. Therefore, the Proposed Project would not conflict with this policy.
Policy CE15.2 Work with SMC to increase the bicycle and pedestrian connections to the community, with welcoming design including gathering spaces, and	**No Conflict.** The Proposed Project would provide bicycle parking on the Project Site. The Proposed Project architectural design is also intended to promote walking, connectivity, and bicycle access

coordinated land use decisions.	to the Main Campus. The Proposed Project would require site plan approval from SMFD and SMPD to ensure pedestrian and bicycle safety in the design of the Proposed Project. Therefore, the Proposed Project would not conflict with this policy.
GOAL S2: Reduce GHG emissions from land use and transportation decisions.	**No Conflict.** The Proposed Project's consolidation of the Arts program into one building would reduce GHG emissions associated with trips between the two current Arts Program locations. The fact that the Proposed Project would be located on an infill lot in close proximity to a major employment center and various transit options would also help reduce car travel, leading to a reduction in GHG emissions. The Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the 2019 California Energy Code, the California Community Colleges Board of Governors Energy and Sustainability Policy, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030 and 80 percent below 1990 levels by 2050. Therefore, the Proposed Project would not conflict with this goal.
Policy S2.2 In cooperation with the state and SCAG, proactively promote the implementation of SB 375, in particular utilizing its incentives for transit-oriented development. The City will also ensure that its local plans are consistent with the Sustainable Communities Strategy (SCS) plan requirement of SB 375.	**No Conflict.** SCAG's 2016 RTP/SCS was developed to encourage compact development and reduce vehicle miles travelled per the requirements of SB 375. The Proposed Project would be consistent with key provisions of the RTP/SCS by focusing jobs and compact growth in a high-quality transit area and providing biking and walking infrastructure to encourage a reduction in car travel. Therefore, the Proposed Project would not conflict with this policy.
GOAL S5: Improve the environmental performance of buildings**.**	**No Conflict.** The Proposed Project would replace several older, less energy efficient buildings with a single LEED Silver-certified building that includes various energy-saving components. The Proposed Project would comply with the energy conservation standards of Title 24 of the California Administrative Code and the California Community Colleges Board of Governors Energy and Sustainability Policy. The Proposed Project would also include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Therefore, the Proposed Project would not conflict with this goal.
Source: Santa Monica Land Use & Circulation Element, Adopted July 6, 2010, Revised July 25, 2017. Parker Environmental Consultants, 2020.	

City of Santa Monica Zoning Ordinance

The zoning designation for the Project Site is NC (Neighborhood Commercial) with a General Plan land use designation of Neighborhood Commercial, fronting Pico Boulevard and R1 (Single-Unit Residential) with a General Plan land use designation of Single Family Housing, fronting Bay Street. As stated previously, the SMC, as part of the District, operates independently from the City of Santa Monica regarding zoning, specifically under the provisions of Section 53094 of the California Government Code, which provides that school districts may override the local zoning ordinance of a city or county, except for certain non-classroom facilities. As the Proposed Project is proposed as a classroom-providing facility, it qualifies for exemption from the Santa Monica Zoning Ordinance, including height and setback restrictions.

As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site. With approval of the proposed Amendment to the SMC Career and Educational Facilities Master Plan (2010 Update) and adherence to appropriate regulatory compliance measures, any impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Proposed Project's land use impacts would not be cumulatively considerable since the Proposed Project would not conflict with applicable local or regional plans and the Proposed Project's land use impacts would be less than significant.

12. Mineral Resources

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

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone (MRZ-2) Area or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

Using the California Department of Conservation's interactive maps on mines and minerals, the Project Site is not located within an MRZ-2 Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[32] The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

[32] *California Department of Conservation, CGS Information Warehouse: Mineral Land Classification, SMARA Study Areas, Special Report 143: Part II, Mineral Land Classification Map, Plate 2-5, website: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc*

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. As stated before, the Project Site is not located within an MRZ-2 Area.[33] As discussed above, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the related projects in the project vicinity would not result in the loss of availability of a known mineral resource or locally important mineral resource recovery site. The Project Site and the surrounding urbanized area are not zoned for extraction of a mineral resource and would not convert an existing or future mineral extraction use to another use. Therefore, no cumulative impact would occur.

13. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

[33] *Ibid.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

> L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of

constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to concert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. The WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.[34]

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption.

Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings covers at least 40 percent of the total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a

[34] *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016.*

maximum reduction limit of 10 dBA.[35] Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.[36]

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 4.17, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations near the Project Site and fronting the nearby land uses as the most likely sensitive receptors to experience noise level increases during construction and at the major roadways surrounding the Project Site. The detailed noise monitoring data are presented in Appendix F, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 4.11, Existing Ambient Daytime Noise Levels.

Sensitive Receptors

Several noise sensitive land uses are located adjacent to and in the vicinity of the Proposed Project. For purposes of assessing noise and groundborne vibration impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

1) Single-family residences immediately south and southeast of the Project Site;

2) The Palm Motel, located at 2020 14th Street;

3) Multi-family residences located immediately west of the Project Site, fronting 14th Street;

4) Single-family residences located southwest of the Project Site, fronting 14th Street; and

[35] *California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.*

[36] *Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2006.*

Table 4.11
Existing Ambient Daytime Noise Levels

ID	Location	Primary Noise Sources	Noise Level Statistics [a] *(dBA)*		
			L_{eq}	L_{min}	L_{max}
A	On the southern side of Pico Boulevard, adjacent to the northeast corner of the Project Site	Heavy vehicle traffic (cars, trucks, buses), light pedestrian activity	71.4	55.4	81.4
B	On the southern side of Pico Boulevard, adjacent to the northwest corner of the Project Site	Heavy vehicle traffic (cars, trucks, buses), light pedestrian activity	69.1	55.7	79.9
C	On the eastern side of 14th Street, adjacent to the southwest corner of the Project Site	Moderate vehicle traffic (cars, trucks, buses), light pedestrian activity	64.2	49.7	74.1
D	On the northern side of Bay Street, adjacent to the southeast corner of the Project Site	Light vehicle traffic	52.3	44.7	63.9

Notes:
[a] *Noise measurements were taken on January 31, 2020 at each location for a duration of 15 minutes. See Appendix F of this IS/MND for noise monitoring data sheets.*
Parker Environmental Consultants, 2020.

5) Multi-family residences located further west of the Project Site, fronting Euclid Street.

The locations of these land uses relative to the Project Site are depicted in Figure 4.17, Noise Monitoring and Sensitive Receptor Location Map.

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

Less Than Significant with Mitigation Incorporated. A significant impact would occur if a project results in exposure of persons to, or generation of noise in levels in excess of standards established in the Santa Monica General Plan Noise Element (Noise Element), the City of Santa Monica Noise Ordinance (Noise Ordinance), or applicable standards of other agencies. Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Proposed Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

LEGEND

- Project Site Boundary
- Santa Monica College Campus
- Sensitive Receptors:
  - (1) Single-family residential south and southeast of the Project Site
  - (2) The Palm Motel 2020 14th Street
  - (3) Multi-family residential west of Project Site
  - (4) Single-family residential southwest of Project Site
  - (5) Multi-family residential fronting Euclid Street
- # Noise Monitoring Locations

A	Leq: 71.4 dB Lmin: 55.4 dB Lmax: 81.4 dB	
C	Leq: 64.2 dB Lmin: 49.7 dB Lmax: 74.1 dB	
B	Leq: 69.1 dB Lmin: 55.7 dB Lmax: 79.9 dB	
D	Leq: 52.3 dB Lmin: 44.7 dB Lmax: 63.9 dB	

SCALE: APPROXIMATE
0 100' 200'

N

Source: Google Earth, Aerial View, 2020.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 4.17
Noise Monitoring and Sensitive Receptor Location Map

SMMC Chapter 4.12 establishes the City's Noise Ordinance. The Noise Ordinance sets forth allowable exterior noise standards based on zones. Noise Zone I includes residential districts; Noise Zone II includes commercial districts; and Noise Zone III includes manufacturing and industrial districts. The SMC Main Campus and the surrounding vicinity are located in Noise Zone II. The Project Site is located in two zones; the southern portion of the Project Site within the R-1 Residential Zone and the northern portion of the Project Site is within the neighborhood Commercial Zone. Thus, for purposes of addressing noise impacts, the criteria for the more restrictive Noise Zone I would apply to the Proposed Project. Table 4.12, Santa Monica Exterior Noise Standards, provides the exterior noise standards for each Noise Zone. Noise standards for the zones are more restrictive during night hours (i.e.,10:00 PM to 7:00 AM). SMMC Section 4.12.060(b) states where ambient noise levels exceed the threshold established in Table 4.12 below, the ambient noise shall be the standard.

Table 4.12
Santa Monica Exterior Noise Standards

Noise Zone	Time Interval	Allowable Exterior Noise Equivalent Level (Leq)
I (Residential)	Monday – Friday 10 PM – 7 AM 7 AM – 10 PM	 50 dBA 60 dBA
	Saturday and Sunday 10 PM – 8 AM 8 AM – 10 PM	 50 dBA 60 dBA
II (Commercial)	All Days of Week 10 PM – 7 AM 7 AM – 10 PM	 60 dBA 65 dBA
III (Industrial)	Anytime	70 dBA
Source: SMMC Section 4.12.060.		

SMMC Section 4.12.110 restricts construction activity to between the hours of 8:00 AM and 6:00 PM, Monday through Friday, and between the hours of 9:00 AM and 5:00 PM on Saturday. The SMMC prohibits construction activities on Sunday or major national holidays. SMMC Section 4.12.110(b)(1) states that noise created by construction activity shall not cause the equivalent noise level to exceed the noise standards specified in Table 4.12 above for the noise zone where the measurement is taken, plus 20 dBA. SMMC Section 4.12.110(b)(2) states noise created by construction activity shall not cause a maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Table 4.12 above for the noise zone where the measurement is taken plus 40 dBA, for any period of time.

Construction Noise Impacts

Based on the standards of SMMC Sections 4.12.060, the allowable exterior noise equivalent level would be 80 dBA during permissible construction hours (between 8:00 AM and 6:00 PM). Construction of the Proposed Project would require the use of equipment for demolition and building construction activities. During each construction phase, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

Construction of the Proposed Project would require the use of heavy equipment for demolition/site clearing, grading/excavation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur on-site are presented in Table 4.13, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table 4.13
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

The noise levels shown in Table 4.13, represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. These noise levels are representative of the noise levels that would occur on a temporary and intermittent basis during construction of the Proposed Project. Construction noise during the heavier initial periods of construction could be expected to be 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of

construction activity.[37] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100 feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Proposed Project would be expected to generate similar noise levels to those shown in Table 4.13 during the approximate 24-month construction period.

Based on the composite noise levels provided above, maximum construction-related noise levels could potentially exceed the 80 dBA construction noise limit by up to 6 dBA during the noisier grading/excavation and finishing phases prior to mitigation. In accordance with the SMMC, and as required by Mitigation Measure N-2, below, these activities would be restricted to occur between the hours of 10 A.M. and 3:00 P.M. should the noise levels exceed 80 dBA L_{eq}. Several noise reducing mitigation measures would also be incorporated to reduce the Proposed Project's exterior noise impacts during construction to reduce construction noise impacts. As noted in Mitigation Measure N-1 through N-6, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices and sound mufflers, and operate machinery in a manner that reduces noise levels (i.e., stockpiling and vehicle staging areas shall be located away from occupied dwellings and other sensitive receptors) would be effective in reducing noise impacts. Additionally, localized and portable sound enclosures would be used to significantly reduce noise from these types of equipment.

Implementation of Mitigation Measures N-1 through N-6 would reduce the noise levels associated with construction of the Proposed Project to nearby multi-family residents and hotel buildings to less than significant levels. Thus, based on the provisions set forth in SMMC 4.12.060, and with implementation of the mitigation measures identified below, temporary construction-related noise impacts would be considered less than significant.

[37] *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

Mitigation Measures:

Increased Noise Levels (Demolition, Grading, and Construction Activities)

N-1 Pursuant to Section 4.12.110 of the Santa Monica Municipal Code, no demolition of buildings, excavation/grading or construction activity is permitted before 8 a.m. or after 6 p.m. on Monday through Friday, before 9 a.m. or after 5 p.m. on Saturday, all day on Sunday, and on all national holidays.

N-2 Pursuant to Section 4.12.110 (d) of the Santa Monica Municipal Code, any construction activities that exceed 80 dBA equivalent noise level shall occur between the hours of 10:00 A.M. and 3:00 P.M., Monday through Friday.

N-3 Prior to construction, the contractor shall submit a list of equipment and activities required during construction to the SMC Office of Facilities Planning.

N-4 All construction equipment shall be in proper operating condition and fitted with standard factory noise attenuation features.

N-5 Sound blankets shall be used on all construction equipment where technically feasible.

N-6 A construction relations officer shall be appointed by the College to act as a liaison with neighbors and residents concerning on-site construction activity.

N-7 Stockpiling and vehicle staging areas shall be located away from occupied dwellings and other sensitive receptors to the extent feasible.

Operational Noise

HVAC and Mechanical Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structure. However, the noise levels generated by these equipment types would not be substantially greater than those generated by the current HVAC equipment serving the existing buildings in the Project vicinity. Further, HVAC equipment would be mechanically screened to ensure compliance with the SMMC. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not exceed the ambient noise levels, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. The Proposed Project's noise impacts from HVAC equipment would be less than significant.

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

Less Than Significant. A significant impact would occur if the Proposed Project were to generate excessive vibration during construction or operation. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

Construction Vibration

The Proposed Project would be constructed using typical construction techniques that have the potential to generate low levels of groundborne vibration during demolition, excavation, and earthwork activities. However, SMMC Section 4.12.070, Vibration, addresses vibration during construction activities, and it states that the vibration caused by construction activity, moving vehicles, trains, and aircraft shall be exempt from this the threshold established within the SMMC. The Proposed Project would comply with the applicable building setbacks and would not require the use of any pneumatic drilling or heavy machinery capable of producing strong groundorne vibrations. Accordingly, the Proposed Project's groundborne vibration impacts would be less than significant.

Operational Vibration

The Proposed Project would include a two-story Art Complex Replacement building and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. The closest airport to the Project Site is the Santa Monica Municipal Airport, approximately located 1.4 miles east of the Project Site. However, the Project Site is not located within any airport land use plan or airport hazard zone. Additionally, the Project Site is not located in the vicinity of a private airstrip. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant with Mitigation Incorporated. Development of the Proposed Project in conjunction with the related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Santa Monica. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. Based on the mapped locations of the related projects shown in Figure 3.10, none of the related projects are located within 500 feet of the project such that cumulative construction noise would be generated. While the Proposed Project's potential noise impacts are less than significant following mitigation, it is possible that a proximate related project's noise impacts, when coupled with the noise impacts of the Proposed Project, could result in a cumulatively significant noise impact. However, construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. Each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Thus, the cumulative impact associated with construction noise would be mitigated to less than significant levels, and the Proposed Project's incremental effects would not be cumulatively considerable.

With respect to cumulative operational noise impacts, each of the related projects would be required to comply with SMMC Section 4.12.130, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties established by SMMC

Section 4.12.060. Moreover, the siting and development of related projects would be subject to further CEQA review and evaluated on a case-by-case basis. Thus, the cumulative impact associated with operational noise would be less than significant.

14. Population and Housing

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

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On April 7, 2016, SCAG's Regional Council adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. Table 4.14, below, shows the SCAG population, housing, and employment projections for the City of Santa Monica, Los Angeles County, and SCAG Region from 2012 through 2040.

Table 4.14
SCAG Population and Housing Projections for the City of Santa Monica, Los Angeles County, and the SCAG Region

Population			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Santa Monica City	90,700	103,400	14%
Los Angeles County	9,923,000	11,514,000	16%
SCAG Region	18,322,000	22,138,000	21%
Households			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Santa Monica City	47,100	53,900	14%
Los Angeles County	3,257,000	3,946,000	21%
SCAG Region	5,885,000	7,412,000	26%
Employment			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Santa Monica City	89,600	103,700	15%
Los Angeles County	4,246,000	5,226,000	23%
SCAG Region	7,440,000	9,872,000	33%

Source: SCAG, adopted 2016 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.

While construction of the Proposed Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project, which could induce substantial population growth.

The Proposed Project would include the development of an Art Complex Replacement building for SMC that would replace the existing Art Complex at the Main Campus and the Ceramics Building at the Airport Arts Campus south of the Santa Monica Airport. Since the Proposed Project would not include the construction of any residential units, the Proposed Project would not result in direct population growth to the City of Santa Monica. With respect to indirect population growth, the Proposed Project is intended to provide efficient and updated classrooms, laboratories, and office space. No increase in student enrollment is anticipated. It is anticipated that most of the jobs generated by the Proposed Project would be filled by teachers and staff who already serve the existing Art Complex at the Main Campus and the Ceramics Building at the Airport Arts Campus south of the Santa Monica Airport. Therefore, the Proposed Project would not directly contribute to population growth in the vicinity of the Project Site and most of the jobs and employees generated by the Proposed Project would be filled by people already working at SMC. Since the Proposed Project would not result in an increase in student or teacher population, development of the Proposed Project would not be expected to result in an increase in residents from future students or staff. Therefore, the Proposed Project would not result in indirect population growth with new persons relocating to the City of Santa Monica, and any such indirect population growth would be well within SCAG's population growth projections. As such, the Proposed Project's population and housing impacts would be less than significant.

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

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project site is on a College-affiliated parking lot and two parcels of vacant land. No displacement of existing housing would occur with the Proposed Project. Thus, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional jobs and employment opportunities to the Project Site area. New employment from related projects could also result in population growth if new employees move to the area, resulting in direct and indirect population growth in the Project Site area.

As discussed in response to Checklist Question 14(a), the Proposed Project would not result in direct substantial population growth for the City of Santa Monica subregion. The Proposed Project would not include any residential land uses and as such, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, jobs in commercial and institutional land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial and residential land uses. As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

15. Public Services

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

Construction

During construction, emergency vehicle access to the Project Site would be maintained for pedestrians and emergency vehicles throughout construction activities. Temporary lane closures along Pico Boulevard, 14th Street, and Bay Street could potentially affect emergency vehicle travel in the Project vicinity. However, as required by Mitigation Measure TR-1 in Checklist Question XVII below, the Proposed Project would implement

a Construction Impact Mitigation Plan that would be reviewed by the Santa Monica Transportation Management Division and the Fire Department ("SMFD") to reduce or avoid temporary traffic impacts on surrounding roadways and potential safety issues during construction. With implementation of the Construction Impact Mitigation Plan, impacts resulting from Proposed Project construction would be less than significant.

Operation

The Proposed Project would be designed in accordance with all applicable fire codes. In accordance with the 2019 California Building Code and the California Fire Code, 2019 Edition, the Proposed Project would be designed to accommodate the evacuation of all occupants in the event of an emergency. In addition, the Project would be designed in accordance with the applicable provisions of the DSA pertaining to fire protection, such as the provision of water line improvements and connections to ensure adequate fire flows, the use of fire sprinklers, portable fire extinguishers, smoke detection systems with fire alarms, and egress lighting and exit signage. With these requirements the Proposed Project would result in a similar demand for fire protection services as under existing conditions, and the SMFD would not need to construct a new facility or expand an existing facility to accommodate demand associated with the Project. The closest fire station to the project is SMFD Fire Station 3, currently located at 1302 19th Street, approximately 1.3 miles north of the Project Site. SMFD Fire Station 3 provides two paramedic engine companies, each with a crew of four; one hazardous materials response vehicle, and one reserve engine that would adequately serve the Proposed Project. With site plan approval from the SMFD, the Proposed Project would result in a less than significant impact.

b) Police protection?

Less Than Significant Impact. The Santa Monica College Police Department (SMCPD) is the primary law enforcement agency responsible for law enforcement on SMC facilities. The SMCPD's headquarters is located on the SMC Main Campus, located at 1718 Pearl Street, which is approximately 0.5 miles (driving distance) east of the Project Site. The SMCPD has a mutual assistance agreement with the SMPD and both departments assist each other in responding to emergency situations as the need arises. A significant impact may occur if the SMCPD or SMPD could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment.

The Proposed Project would include the construction of a two-story Art Complex Replacement Building that would serve students of Santa Monica College. The Proposed Project would increase the utilization of the Project Site by adding increased number of students and staff to the Project Site, which would potentially increase the

demand for Santa Monica College Police Department (SMCPD) services. SMCPD currently patrols the Lot 6 parking lot. The Project Site would continue to be served by the SMCPD 24 hours a day, 7 days a week, 365 days a year.

Construction

As discussed above, the implementation of a Construction Impact Mitigation Plan would ensure adequate emergency vehicle access to the Project Site and surrounding vicinity during Project construction. Further, Proposed Project construction would largely occur within the boundaries of the Project Site and is not anticipated to result in an increase in incidence of theft or vandalism because of the continued employment of on-site security officers. Therefore, Proposed Project impacts would be less than significant during the construction period.

Operation

The Proposed Project would shift student and faculty occupancy to a site that is partially utilized as a surface parking lot and partially vacant. The Proposed Project would be well illuminated and designed to ensure the safety of its students and staff. Since the Proposed Project would not result in an increase in student population, implementation of the Proposed Project would not be expected to result in an increase in the demand for police services from the SMCPD or the SMPD. While the Proposed Project would be patrolled, police services would be similar to those required by the existing uses on the Project Site. Overall, police service impacts and staffing needs are based on the population served, which would not change as a result of the development of the Proposed Project. Therefore, the Proposed Project impacts on police services would be less than significant.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Santa Monica-Malibu School District.

A significant impact generally occurs if a project includes substantial population growth through residential development that could generate an increased demand in school facilities. The Proposed Project would replace the existing Art Complex at the Main Campus and the Ceramics Building at the Airport Arts Campus south of the Santa Monica Airport. The Proposed Project is intended to provide efficient and updated classrooms, laboratories, and office space. No increase in student enrollment is anticipated. Since the Proposed Project would not result in an increase in student

population, development of the Proposed Project would not be expected to result in an increase in the demand for public schools for children of future students or staff. Therefore, development of the Proposed Project would not increase the population served at SMC. Therefore, the Proposed Project impacts on public school services would be minimal, and a less than significant impact would occur.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if a project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Proposed Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.

A significant impact generally occurs if a project includes substantial population growth through residential development that could generate an increased demand in recreational and park facilities. The Proposed Project includes the development of a two-story Art Complex Replacement building for SMC. The Proposed Project would not result in direct population growth since the Proposed Project does not include residential uses. Therefore, the Proposed Project would not cause an increase on local parks and recreational facilities by new residents. The Proposed Project is expected to shift students and staff in the Art Program located on the Main Campus and at the satellite Airport Arts Campus, located south of the Santa Monica Airport, to the Project Site and may increase activity in the surrounding area and surrounding recreation and park facilities. As such, the Proposed Project may result in slightly increased recreation and park use in the Project Site vicinity. Nevertheless, the increase use in recreation and park facilities would be minimal, and a less than significant impact would occur.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site.

Within the City of Santa Monica, the Santa Monica Public Library provides library services to the Project Site and surrounding neighborhood. As mentioned previously, the Proposed Project includes the development of a two-story Art Complex Replacement building for SMC. The development of the Proposed Project is not anticipated to increase student enrollment or service population. Rather, the Proposed

Project is expected to shift students and staff in the Art Program located on the Main Campus and at the satellite Airport Arts Campus, located south of the Santa Monica Airport, to the Project Site. Therefore, any increases in the use of library facilities caused by the Proposed Project are expected to be minimal, since residents usually utilize local libraries and SMC students are welcome to use the Santa Monica College Library at the Main Campus. Therefore, the Proposed Project's impacts upon library services would be minimal, and a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the SMFD service area. Specifically, there could be increased demands for additional SMFD staffing, equipment, and facilities over time. Over time, SMFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate fire protection services is the responsibility of the City. SMFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or

new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, SMFD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. However, as the SMFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon SMFD services is deemed to be less than significant.

Police

With respect to police services, the Proposed Project, in combination with the related projects, would increase the demand for police protection services in the Project Site area. The Proposed Project Site is primarily served by the SMCPD, and, as such, would not generate a cumulatively considerable impacts upon SMPD services. Furthermore, the SMPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service associated with citywide growth. Through the City's regular budgeting efforts, the SMPD's resource needs would be identified and monies allocated according to the priorities at the time. However, neither the SMCPD, nor the SMPD have any plans for new police stations to be developed in proximity to the Project Site. As such, no impacts associated with constructing new or expanding existing facilities occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate police services is the responsibility of the City. SMPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, SMPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Schools

With respect to cumulative impacts upon schools, the Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the Santa Monica-Malibu School District service area. Development of the related projects would likely generate additional demands upon school services. The related projects, specifically with residential land uses, would have the potential to generate students in the local area. However, each of the new developments would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

Parks

With respect to cumulative impacts upon parks, development of the Project in conjunction with related projects could result in an increase in demands upon parks in the area of the Project Site. However, as a college development, the Proposed Project is expected to contribute very little demand upon daytime park use. Each of the residential related projects are required to comply with payment of Parks and Recreation Fees. Each residential related project would also be required to comply with the on-site open space requirements of the SMMC. Therefore, on a project-by-project basis, the Proposed Project and related projects would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries

With respect to cumulative impacts upon library services, the Proposed Project includes the development of an Art Complex Replacement building and, thus, would not directly increase residential population in the area. Development of the residential related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. However, students and faculty of SMC have access to the SMC library on the Main Campus and thus would not generate a considerable demand for public library services. Therefore, the cumulative impacts related to library facilities would be considered less than significant.

16. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 facilities would occur or be accelerated?

Less Than Significant Impact. A significant impact may occur if the project would include substantial employment or population growth, which would 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. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Proposed Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.

As discussed above, the Proposed Project proposes an Art Complex Replacement building to serve SMC, and thus, would not be adding new residences to the area and would not directly contribute to population growth in the area. Moreover, the Main Campus has a number of recreation opportunities for students and the general public, including Corsair Gym, Corsair Field, the Core Performance Center, and the Santa Monica Swim Center. As such, the Proposed Project would not be expected to increase demand on the surrounding area and surrounding recreation and park facilities. Any increase in recreation and park facilities use would be minimal, and a less than significant impact 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?

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, the Proposed Project does not include a residential component and would not directly result in the increase of residential population in the area. As such, the Proposed Project would not result in a substantial increase of recreational or park use in the area. The Proposed Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant would occur.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Santa Monica. The related projects that include a residential component would be required to provide on-site open space and residential condominium project would be required to pay the Parks and Facilities Tax (Dwelling Unit Tax). Moreover, most projects are required to pay the City's Parks and Recreation Development Impact Fee (SMMC ch. 9.67) to improve recreation and park facilities in the area and to mitigate their impacts upon park and recreational facilities. Additionally, each related project would be subject to the provisions of the SMMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

17. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☒	☐

The following section summarizes and incorporates by reference the information provided in the Santa Monica College Arts Complex Transportation Impact Assessment ("TIA"), prepared by Fehr & Peers, dated April 29, 2020 and is provided as Appendix G to this IS/MND. The site plan and the parking layout for the Project are currently under development. As such, for planning purposes, three possible site access alternatives were identified for analysis in the TIA. The first driveway alternative, a single driveway on Pico Boulevard with an emergency driveway on 14th Street has been identified as the preferred alternative, as described above in Section 3, Project Description.

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

Less Than Significant Impact. For this study SMC has elected to follow the City of Santa Monica's significance criteria based on LOS and vehicle delay at intersections. The City is in the process of updating its thresholds and methodology for analyzing transportation impacts, as discussed in more detail in the VMT Assessment section of the TIA. In the meantime, in accordance with the City's adopted impact analysis criteria, the "Operational Analysis" method from the Highway Capacity Manual (HCM) was employed to perform intersection LOS analysis at all intersections.

Operational Impacts

Level of Service Methodology - Intersections

The HCM 6th Edition operational method determines two key operating characteristics of signalized intersections. The first characteristic is the average stopped delay experienced per vehicle. The second is the volume-to-capacity (V/C) ratio at

intersections. Both metrics are based on the amount of traffic traveling through the intersection, the turning movements of that traffic, the lane geometries, and other factors affecting capacity. These characteristics are used to evaluate the operation of each signalized intersection, which is described generally in terms of level of service (LOS).

LOS categories range from excellent, nearly free-flow traffic at LOS A, to overloaded, stop-and-go conditions at LOS F. LOS definitions for signalized intersections and using the HCM methodology and LOS definitions for the stop-controlled intersections are provided in Table 3 and Table 4, respectively, of the TIA (Appendix G to this IS/MND). The LOS definitions and ranges of delay represent average conditions for all vehicles at an intersection across an entire hour. Delays longer than the average condition are experienced by motorists on certain movements and/or during peak times within the peak hour.

Five intersections in the vicinity of the Project Site were analyzed in the TIA. All but one of the five study intersections are signalized. The intersection of Pearl Street & 14th Street is a four-way stop-controlled intersection. All the signalized intersections are classified as arterial intersections. The City of Santa Monica's adopted criteria have designated LOS D as the minimum desirable LOS at arterial intersections. The minimum desirable LOS – the design condition – allows for some queuing and delays at intersections during peak periods. At intersections operating at an undesirable LOS, delays and queuing are greater than what is considered acceptable.

Existing Volumes

The existing baseline year for the TIA is 2020. Weekday morning and afternoon intersection peak period traffic counts for four of the intersections were collected in November 2017. These counts were supplemented by traffic counts at Pearl Street & 17th Street collected in December 2019. For the peak periods, counts were taken between 7:30 and 9:30 AM in the morning, and 5:00 and 7:00 PM in the afternoon. The traffic counts are included in Attachment B of the TIA.

To adjust these counts to the existing year (2020) the volumes were assumed to increase at a rate of 0.8 percent per year. The TIA was conducted without the use of the City's Travel Demand Forecasting Model (TDFM). Traffic studies conducted in the City of Santa Monica prior to the development of the City's TDFM used this annual growth rate for forecasting. This growth rate is considered conservative in that the traffic growth factor for the 2020-2025 period for the Santa Monica area in the "Congestion Management Program for Los Angeles County" (LA Metro, 2010) is considerably lower

(1 percent in all, or 0.2 percent per year). Furthermore, growth in traffic volume on streets in the area south of I-10, as shown in a recent EIR published by the City for St. John's Health Center, was reviewed. The TIA shows a general decrease in volumes on Pico Boulevard in the vicinity of the Project Site. Overall, the method for estimating growth is conservative and reflects how growth in traffic volume was estimated before the Santa Monica TDFM.

The resulting 2020 intersection volumes are illustrated in Figure 4.18 and, for the purpose of the TIA, represent Existing Conditions. Traffic patterns in the study area are highly influenced by commuter traffic, which is heaviest eastbound/westbound on Pico Boulevard in the morning and afternoon peak periods.

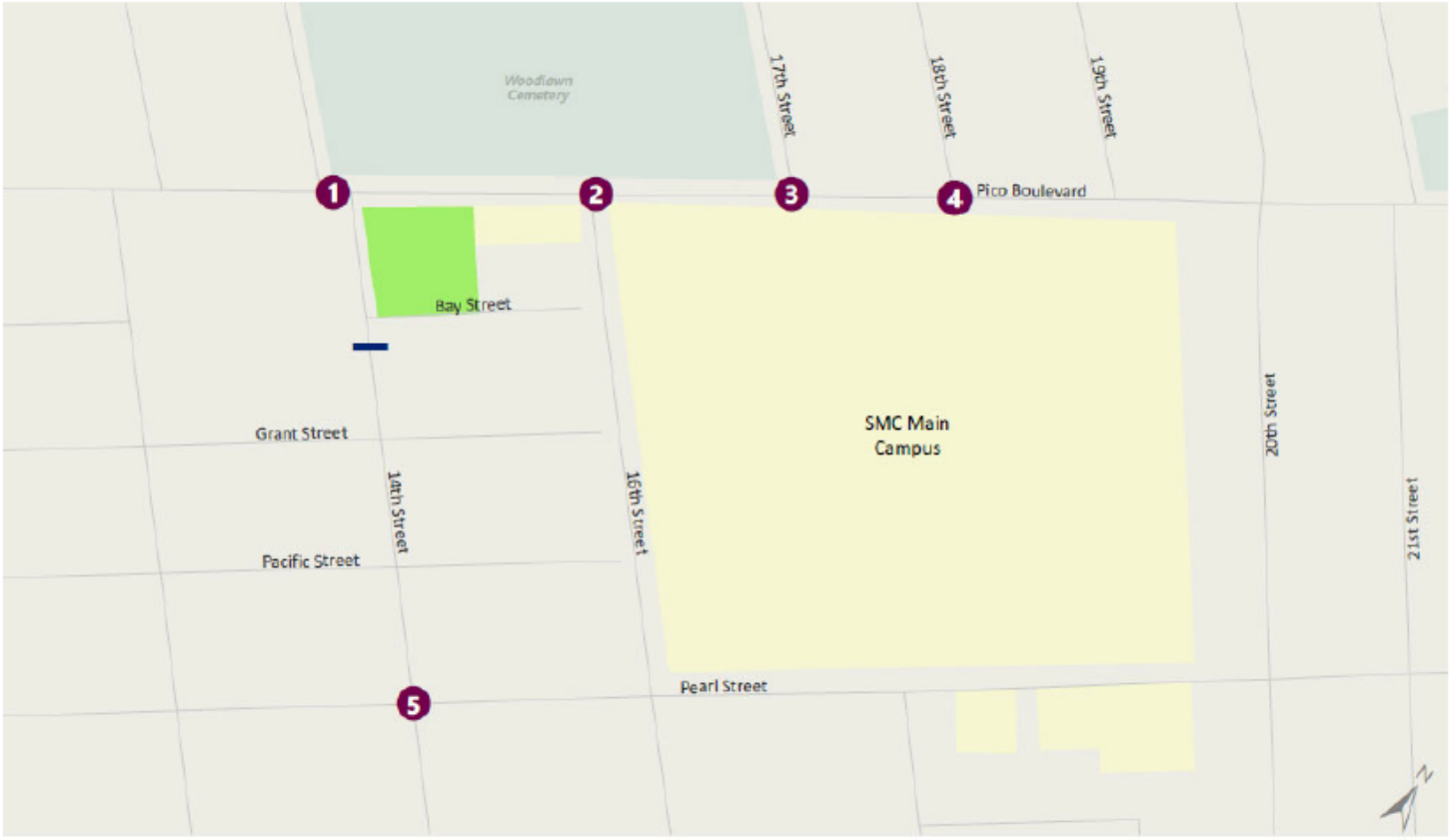
Existing Levels of Service – Intersections

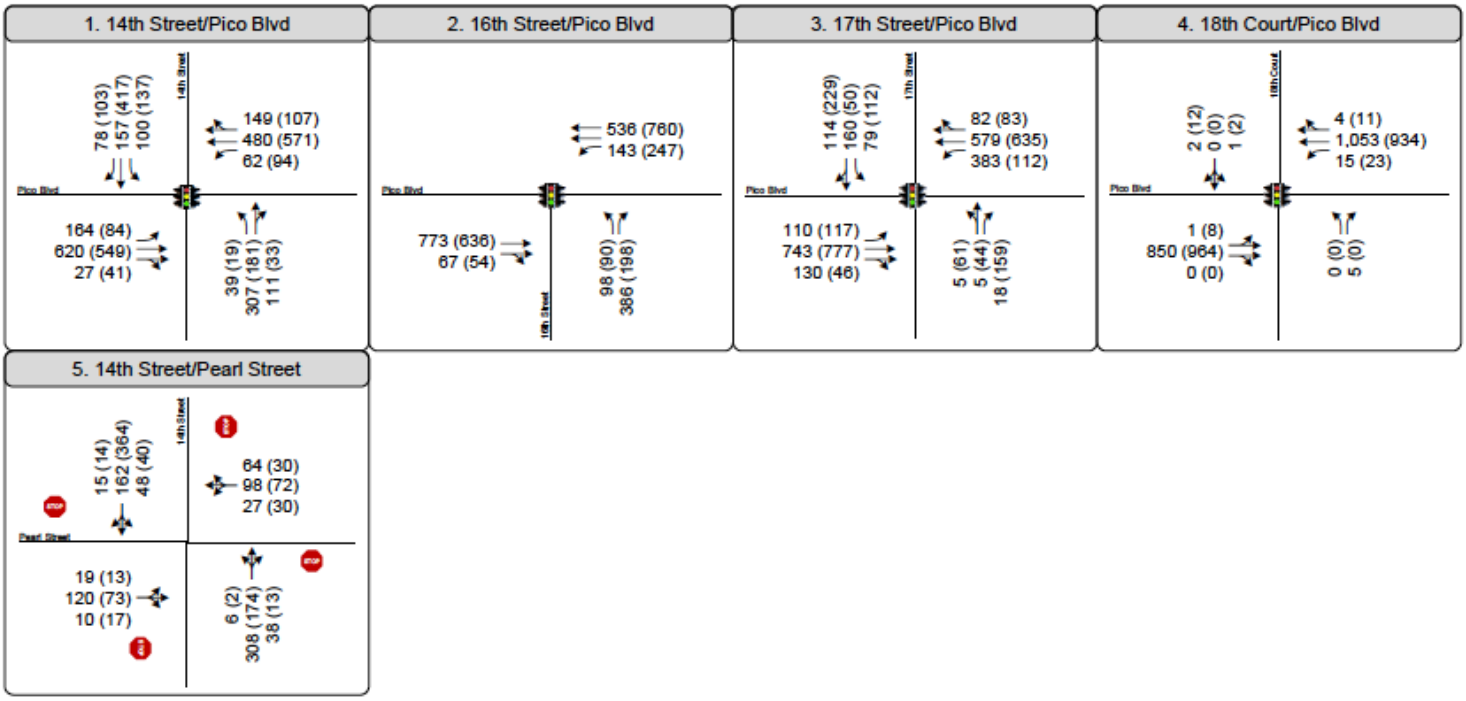
The results of the analysis of existing weekday AM and PM peak hour conditions at the study intersections using the HCM methodology are summarized in Table 4.15. As shown, each of the five study intersections currently operates at LOS D or better in the analyzed peak hours under the existing conditions scenario.

Table 4.15
Existing Intersection Level of Service

No.	Intersection	Peak Hour	Delay *	LOS
1.	14th Street & Pico Boulevard	AM PM	39 52	D D
2.	16th Street & Pico Boulevard	AM PM	32 19	C B
3.	17th Street & Pico Boulevard	AM PM	12 39	B D
4.	18th Court & Pico Boulevard	AM PM	1 10	A A
5.	14th Street & Pearl Street	AM PM	16 16	C C

*Notes: * Average stopped delay per vehicle, in seconds. Locations 1-4 are Arterial intersections, Location 5 is a Feeder intersection.*
Source: Fehr & Peers, Santa Monica College Arts Complex Transportation Impact Assessment, April 29, 2020.





Source: Fehr & Peers, 2020.

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Figure 4.18
Peak Hour Traffic Volumes and Lane Configurations
Existing (2020 Conditions)

Project Trip Generation Estimates

The Proposed Project is not expected to generate any new trips for Santa Monica College as a whole. The Proposed Project would not add classroom space, nor increase student enrollment or staffing. It is intended to improve and consolidate existing classroom space in a new facility located adjacent to the Main Campus. For this reason, the Proposed Project would result in shifts of existing trips but would not be expected to generate new trips. Due to the consolidation of all arts facilities at the Main Campus, in fact, a small decrease in total trips may occur as inter-campus trips would no longer occur. Trips that are currently going to the Airport Arts Campus or elsewhere on the Main Campus would be transferred to the new Arts Complex site and to the Main Campus. The method for estimating these trips is described below.

The trip generation for the Arts Complex has three components listed below. Each component includes unassigning trips from one location and reassigning those trips to another location at SMC.

1. Shift Arts Complex staff from Lot 1 on the Main Campus to parking at the new Arts Complex.

2. Shift trips currently using Lot 6 (Project site) to Structures 3 and 4 on the Main Campus.

3. Shift staff and students from the Airport Arts Campus to Structures 3 and 4 on the Main Campus.

The first component of the trip generation is related to staff parking at the Project Site. It is assumed that these trips would be shifted from Lot 1, which is the staff-only lot adjacent to the existing Arts Complex on the Main Campus. The basis for estimating how many trips will be relocated to the new Arts Complex from Lot 1 is the amount of parking spaces provided at the new facility. While the parking supply at the Project Site is proposed to include 20 parking spaces, 40 spaces were assumed in the TIA to ensure that any potential impacts could be identified. Per direction from SMC, the parking spaces are analyzed as only staff.

The estimated daily and peak hour trips for the new Arts Complex are based on the observed usage at similar staff-only lots on the Main Campus. Data about these parking lots was collected in September 2019 during the parking and traffic studies for the Main Campus Master Plan. The two parking lots on the Main Campus that are restricted to use by only staff and that do not share a driveway with a student/general parking facility

are Lots 2 and 5. Lot 2 is located behind Drescher Hall along Pico Boulevard, and Lot 5 is located on the south side of Pearl Street west of 20th Street. The daily and peak hour driveway trips at these two lots were divided by the maximum daily occupancy of the facility to obtain trip generation rates per space occupied during the day. These rates are shown in Table 3 of the TIA. Table 4 of the TIA applies these trip generation rates to the 40 parking spaces at the new facility.

The second component of the trip generation is the unassignment of the trips parking at the Project Site. The Project Site of the new Arts Complex is currently the location of parking Lot 6. Lot 6 contains 86 parking spaces designated as student/general, meaning that spaces are open to students, staff, and visitors. Data collected for the SMC Main Campus Master Plan included counts at the Lot 6 driveway, which were used to identify the existing level of daily and peak hour trips there. No trip generation rates were used or developed for the TIA, rather the driveway counts were used directly. It is assumed that the people currently choosing to park in Lot 6 would shift to Structures 3 and 4 on the Main Campus, the nearest student/general facilities on the SMC Main Campus.

The third component of the trip generation for the new Arts Complex is shifting trips from the Airport Arts Campus to the Main Campus. The daily and peak hour trips for the Airport Arts Campus are from driveway counts collected on March 9, 2020 at the five driveways for Airport campus parking. Most of the trips generated are in the student/general category, these trips are reassigned to Structures 3 and 4. The small amount of staff trips reassigned from the Airport Arts Campus to the Main campus are included in the reassignment described in the first component of the trip generation.

Project Traffic Distribution

The geographic distribution of the traffic generated by the Proposed Project is based on zip code analysis conducted for the SMC parking and traffic study. Fehr & Peers mapped the responses to surveys about means of transportation to work for students and staff by zip code. The zip codes were aggregated into zones based on the direction they would travel to access the Main Campus to estimate generalized regional trip distributions.

There are two major types of parking at SMC: designated staff parking and student/general parking that is open to students, staff, and visitors. Because different groups are unassigned and reassigned for this analysis a distribution was developed for each type of parking.

The distribution for staff is based on the zip code analysis for the staff who reported travelling to work by driving. The staff distribution is mapped in Figure 4.19, below. The generalized regional trip distribution applied in the analysis for SMC staff is approximately:

- 5% to and from the north
- 15% to and from the south
- 75% to and from the east
- 5% to and from the west

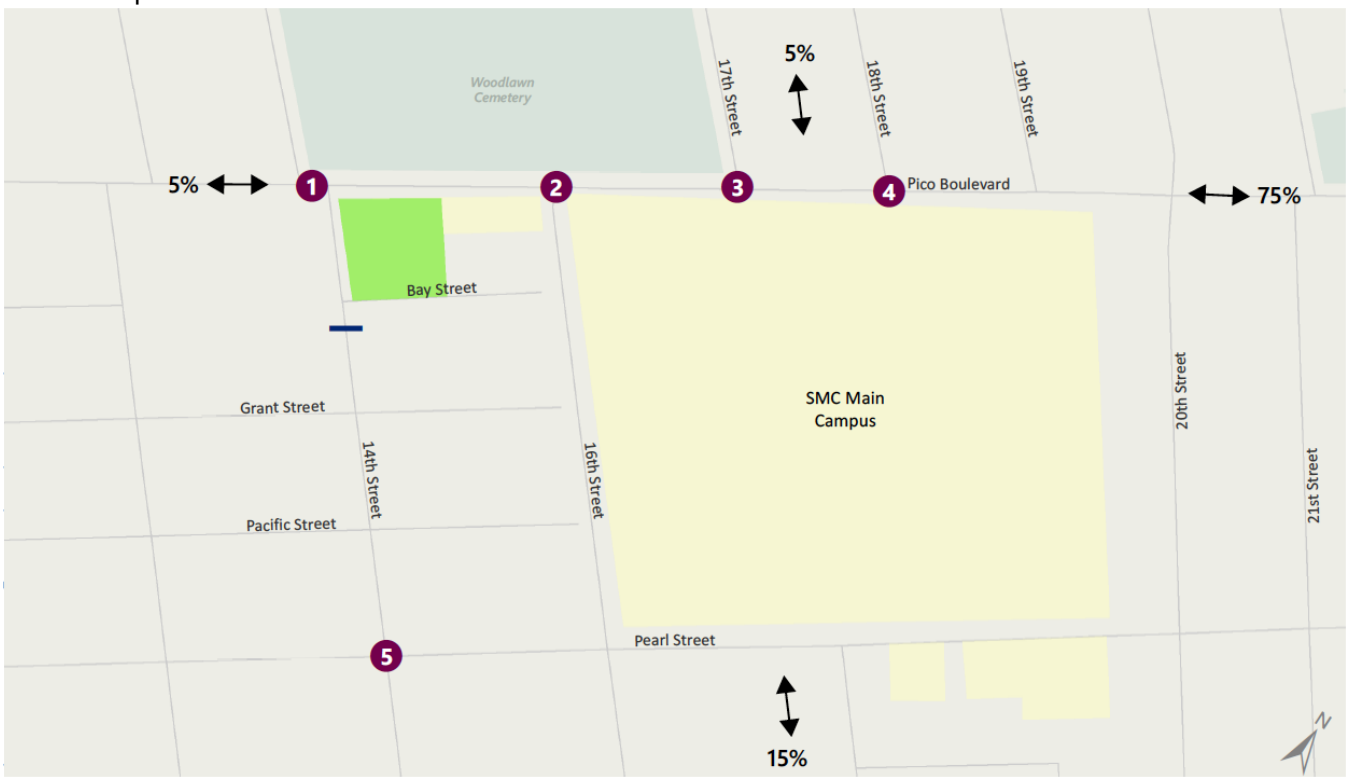
The distribution for staff and students combined is based on staff plus students who reported driving to campus from each zip code. The combined staff and student distribution is mapped in Figure 4.19, below. The generalized trip distribution applied in the analysis for SMC staff and student trips combined is approximately:

- 10% to and from the north
- 10% to and from the south
- 75% to and from the east
- 5% to and from the west

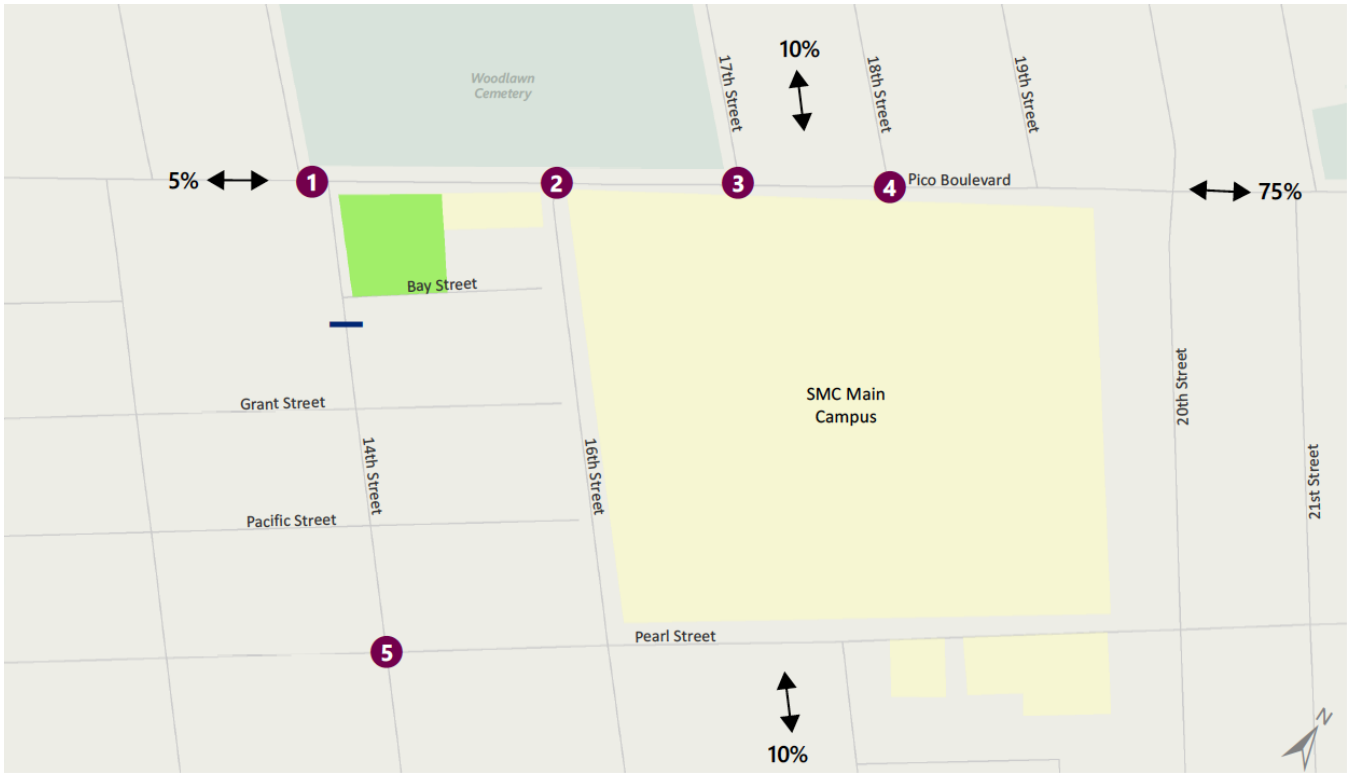
Project Traffic Assignment

Although the Proposed Project does not generate new trips for SMC, it will change the patterns of traffic in the Project area. The Proposed Project will contain approximately 20 general purpose parking spaces. For planning purposes, the TIA conservatively assumes 40 spaces that are reserved for staff only. Some students attending the existing Arts Complex park on Main Campus, and this is not expected to change as the new complex will contain no student parking. The existing Arts Complex's staff likely park in Lot 1 now, but it is expected that some of these staff will shift and park in the provided spaces at the new Arts Complex. This unassignment and reassignment uses the staff trip distribution. Existing trips to Lot 6, where the Proposed Project would be located, were shifted from the Project Site to Parking Structures 3 and 4. Because Lot 6 is unrestricted, the people parking there are both students and staff, so the unassignment and reassignment will use the student and staff's trip distributions. Students and staff going to the Airport Arts Campus are expected to shift to the Main Campus. This unassignment and reassignment will use the student and staff combined trip distribution and will be reassigned to Parking Structures 3 and 4 for most of the trips. Staff trips from the Airport Arts Campus, were included in the assignment of staff

Staff Trip Distribution



Staff and Student Trip Distribution



Source: Fehr & Peers, 2020.

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Figure 4.19
Staff / Staff and Student Trip Distributions

trips to the staff parking at the Project Site described above. The shift of trips to the Project Site was conducted for each of the three site access scenarios discussed above.

Existing Plus Project Traffic Projections

The net change in traffic that would occur with the Proposed Project was assigned to the street system and added to the existing traffic volumes. With three driveway alternatives there are also three plus Project alternatives. The resulting intersection traffic volumes represent the existing plus Project weekday peak hour traffic volumes and are shown in Figure 4.20 to Figure 4.22. The intersection level of service results for Existing plus Project are shown in Table 4.16, below.

Cumulative Base Traffic Projections

The cumulative base traffic projections reflect growth in traffic from background or ambient growth in the existing traffic volumes to reflect the effects of overall regional growth both in and outside of the study area. Traffic volumes in the vicinity of the study area have been assumed to increase at a rate of 0.8 percent per year, or 3.2 percent overall, including development in the surrounding area of the City and the region. The use of this annual growth rate is described above, in the section about Existing Volumes.

The resulting intersection traffic volumes represent the cumulative base weekday peak hour traffic volumes and are shown in Figure 4.23. The intersection level of service results for cumulative base are shown in Table 4.17, below.

No changes to the current intersection lane geometries are expected or reflected in the future analysis.

Cumulative Plus Project Traffic Projections

The net change in traffic that would occur with the development of the Proposed Project was assigned to the street system and added to the cumulative base traffic projections is shown in Figure 4.24 to Figure 4.26. The resulting traffic volumes represent the projected cumulative plus Project weekday peak hour, which includes the projected incremental traffic. The intersection level of service results for Cumulative plus Project are shown in Table 4.17, below.

Table 4.16
Existing Year (2020) Intersection Level of Service and Impact Analysis

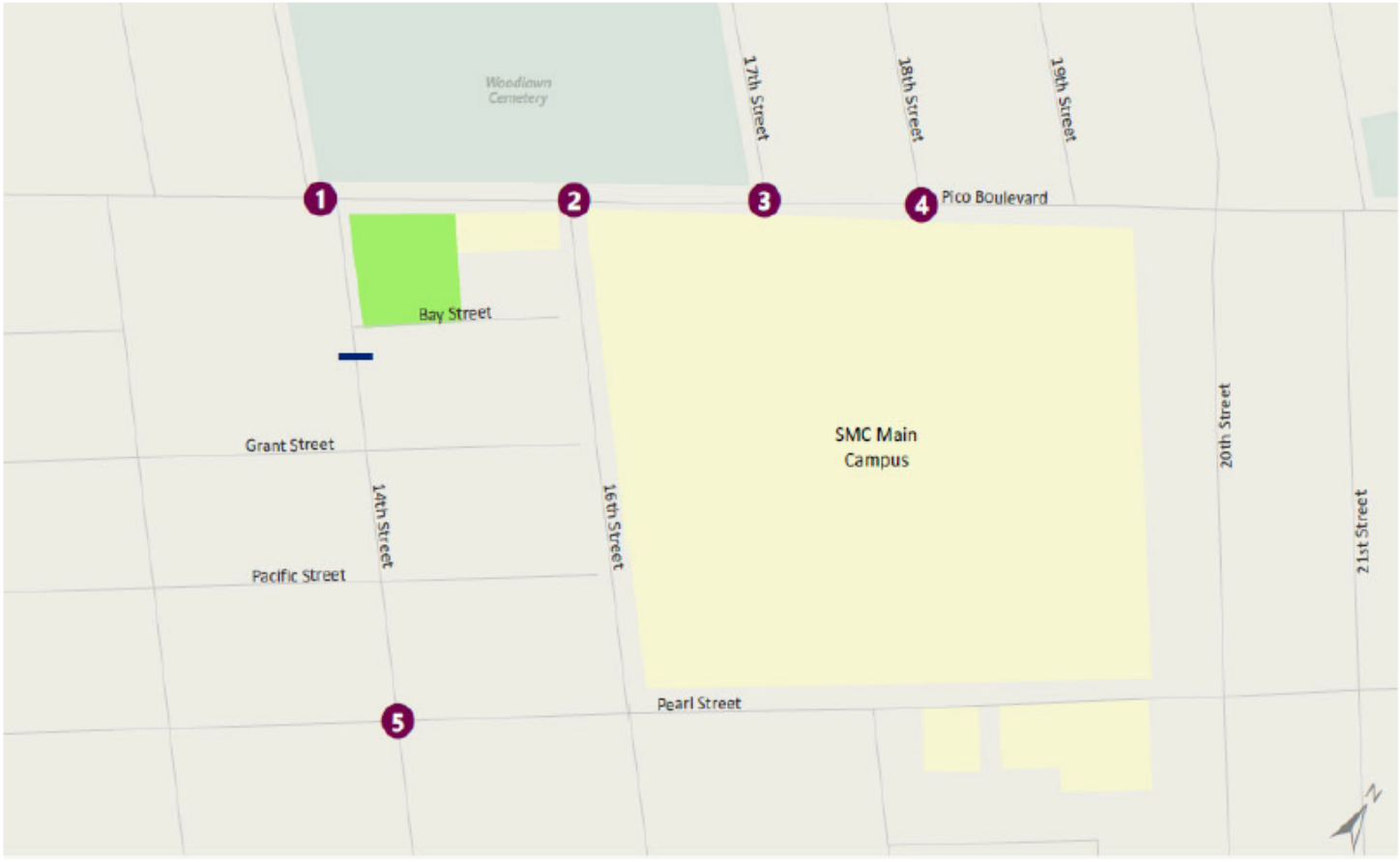
No.	Intersection	Class	Peak Hour	Existing No Project		Existing + Project		V/C Increase	Significant Impact?
				Delay*	LOS	Delay*	LOS		
Driveway Scenario 1: Pico Boulevard Only									
1.	14th Street & Pico Boulevard	A	AM	39	D	39	D	0	No
		A	PM	52	D	52	D	0	No
2.	16 Street & Pico Boulevard	A	AM	32	C	32	C	0	No
		A	PM	19	B	19	B	0	No
3.	17th Street & Pico Boulevard	A	AM	12	B	13	B	1	No
		A	PM	39	D	40	D	1	No
4.	18th Court & Pico Boulevard	A	AM	1	A	1	A	0	No
		A	PM	10	A	10	A	0	No
5.	14th Street & Pearl Street	C	AM	16	C	16	B	0	No
		C	PM	16	C	16	B	0	No
Driveway Scenario 2: 14th Street Only									
1.	14th Street & Pico Boulevard	A	AM	39	D	39	D	0	No
		A	PM	52	D	52	D	0	No
2.	16 Street & Pico Boulevard	A	AM	32	C	32	C	0	No
		A	PM	19	B	19	B	0	No
3.	17th Street & Pico Boulevard	A	AM	12	B	13	B	1	No
		A	PM	39	D	40	D	1	No
4.	18th Court & Pico Boulevard	A	AM	1	A	1	A	0	No
		A	PM	10	A	10	A	0	No
5.	14th Street & Pearl Street	C	AM	10	C	16	B	0	No
		C	PM	16	C	16	B	0	No
Driveway Scenario 3: Pico Boulevard and 14th Street									
1.	14th Street & Pico Boulevard	A	AM	39	D	39	D	0	No
		A	PM	52	D	52	D	0	No
2.	16 Street & Pico Boulevard	A	AM	32	C	32	C	0	No
		A	PM	19	B	19	B	0	No
3.	17th Street & Pico Boulevard	A	AM	12	B	13	B	1	No
		A	PM	39	D	40	D	1	No
4.	18th Court & Pico Boulevard	A	AM	1	A	1	A	0	No
		A	PM	10	A	10	A	0	No
5.	14th Street & Pearl Street	C	AM	10	C	16	B	0	No
		C	PM	16	C	16	B	0	No

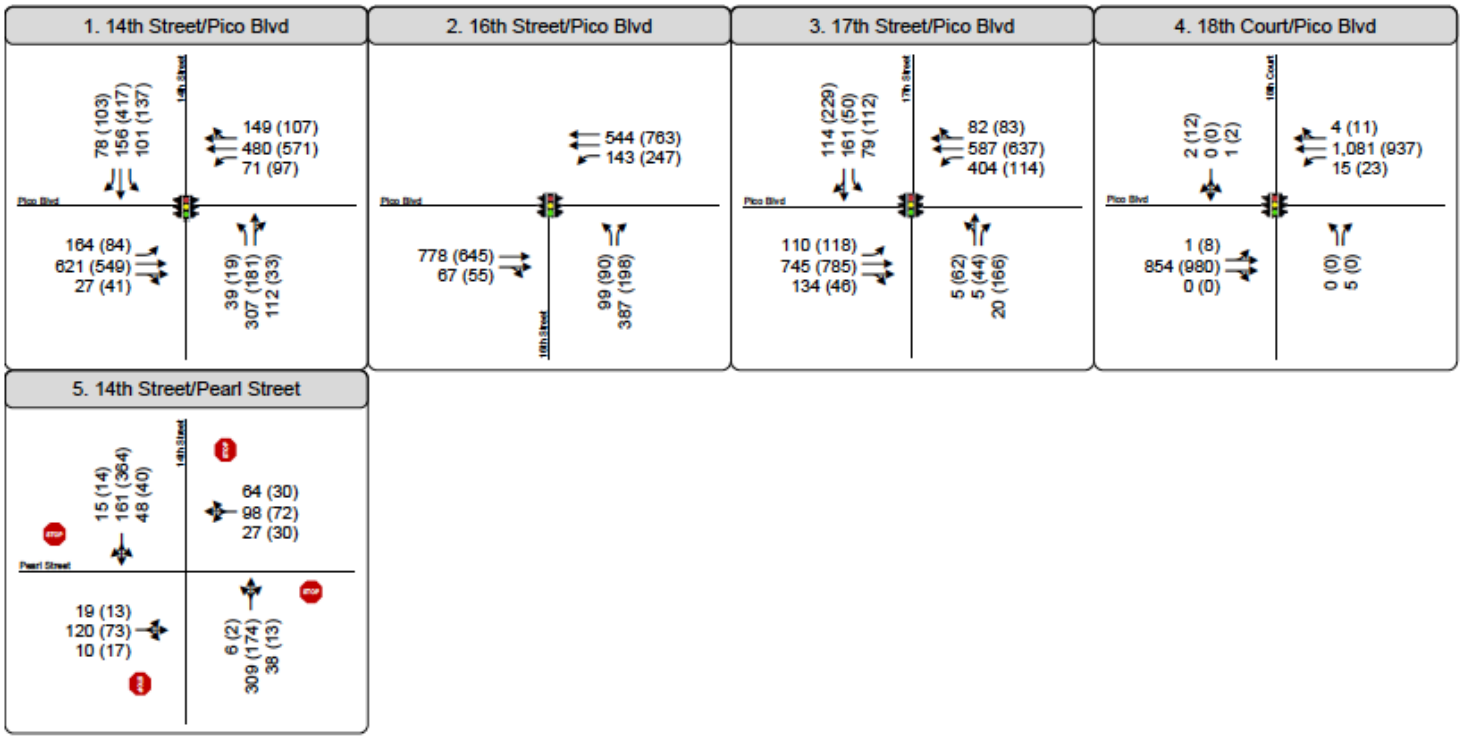
*Notes: *Average stopped delay per vehicle, in seconds.*
Source: Fehr & Peers, Santa Monica College Arts Complex Transportation Impact Assessment, April 29, 2020.

Table 4.17
Future Year (2024) Intersection Level of Service and Impact Analysis

No.	Intersection	Class	Peak Hour	Future No Project		Future + Project		V/C Increase	Significant Impact?
				Delay*	LOS	Delay*	LOS		
Driveway Scenario 1: Pico Boulevard Only									
1.	14th Street & Pico Boulevard	A	AM	41	D	41	D	0	No
		A	PM	55	D	55	D	0	No
2.	16 Street & Pico Boulevard	A	AM	34	C	34	C	0	No
		A	PM	19	B	19	B	0	No
3.	17th Street & Pico Boulevard	A	AM	13	B	14	B	1	No
		A	PM	48	D	50	D	2	No
4.	18th Court & Pico Boulevard	A	AM	1	A	1	A	0	No
		A	PM	10	A	10	A	0	No
5.	14th Street & Pearl Street	C	AM	16	B	17	B	1	No
		C	PM	17	B	17	B	0	No
Driveway Scenario 2: 14th Street Only									
1.	14th Street & Pico Boulevard	A	AM	41	D	41	D	0	No
		A	PM	55	D	55	D	0	No
2.	16 Street & Pico Boulevard	A	AM	34	C	34	C	0	No
		A	PM	19	B	19	B	0	No
3.	17th Street & Pico Boulevard	A	AM	13	B	14	B	1	No
		A	PM	48	D	50	D	2	No
4.	18th Court & Pico Boulevard	A	AM	1	A	1	A	0	No
		A	PM	10	A	10	A	0	No
5.	14th Street & Pearl Street	C	AM	16	B	17	B	1	No
		C	PM	17	B	17	B	0	No
Driveway Scenario 3: Pico Boulevard and 14th Street									
1.	14th Street & Pico Boulevard	A	AM	41	D	41	D	0	No
		A	PM	55	D	55	D	0	No
2.	16 Street & Pico Boulevard	A	AM	34	C	34	C	0	No
		A	PM	19	B	19	B	0	No
3.	17th Street & Pico Boulevard	A	AM	13	B	14	B	1	No
		A	PM	48	D	50	D	2	No
4.	18th Court & Pico Boulevard	A	AM	1	A	1	A	0	No
		A	PM	10	A	10	A	0	No
5.	14th Street & Pearl Street	C	AM	16	B	17	B	1	No
		C	PM	17	B	17	B	0	No

*Notes: *Average stopped delay per vehicle, in seconds.*
Source: Fehr & Peers, Santa Monica College Arts Complex Transportation Impact Assessment, April 29, 2020.





Source: Fehr & Peers, 2020.

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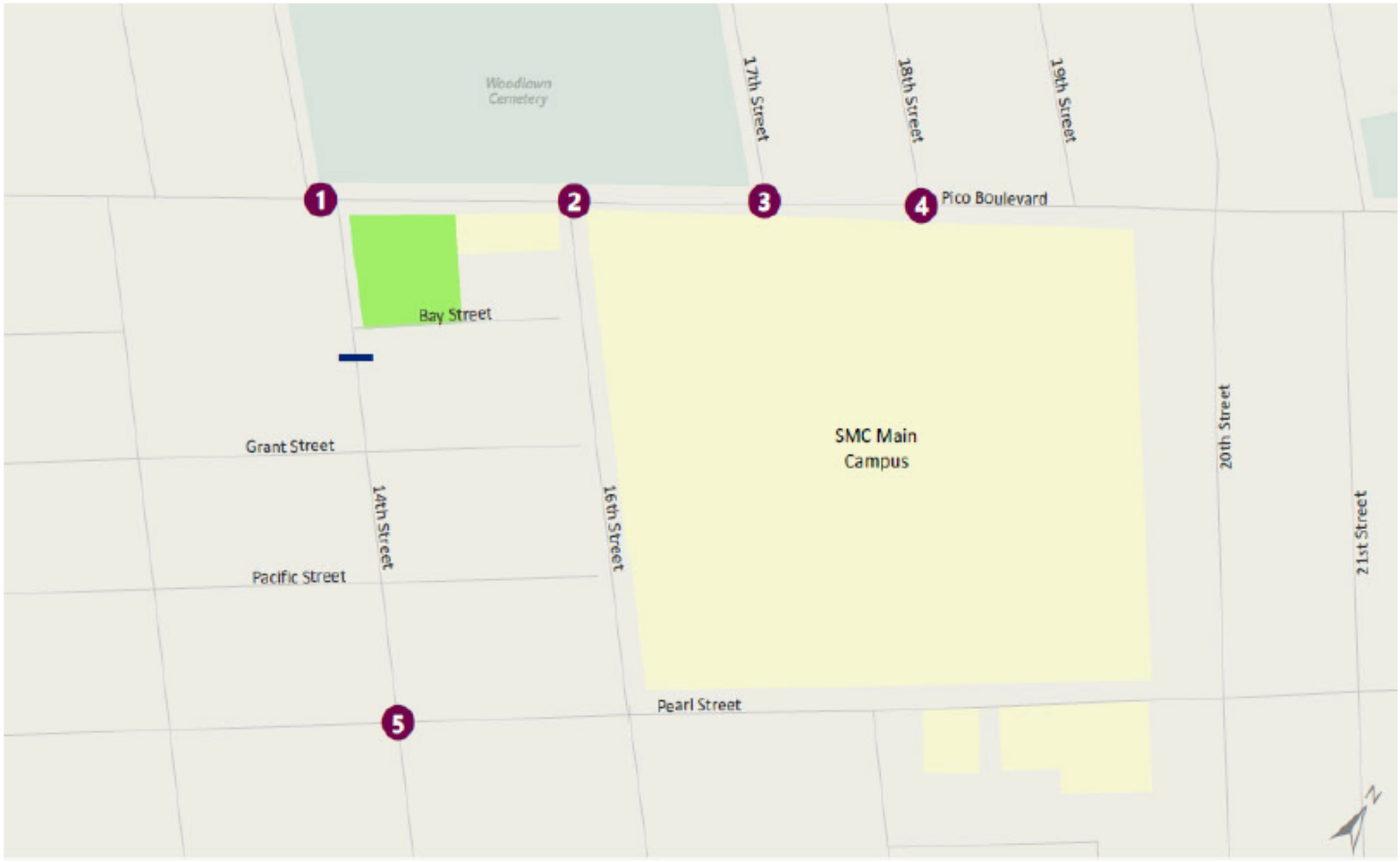
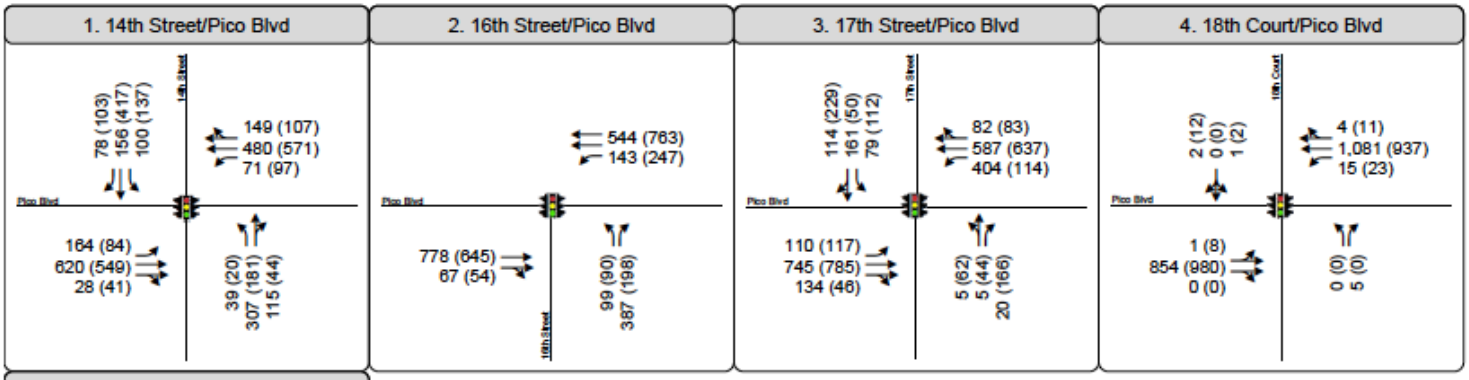
Figure 4.20
Peak Hour Traffic Volumes and Lane Configurations
Existing (2020) Plus Project - Pico Blvd Driveway Only





Source: Fehr & Peers, 2020.

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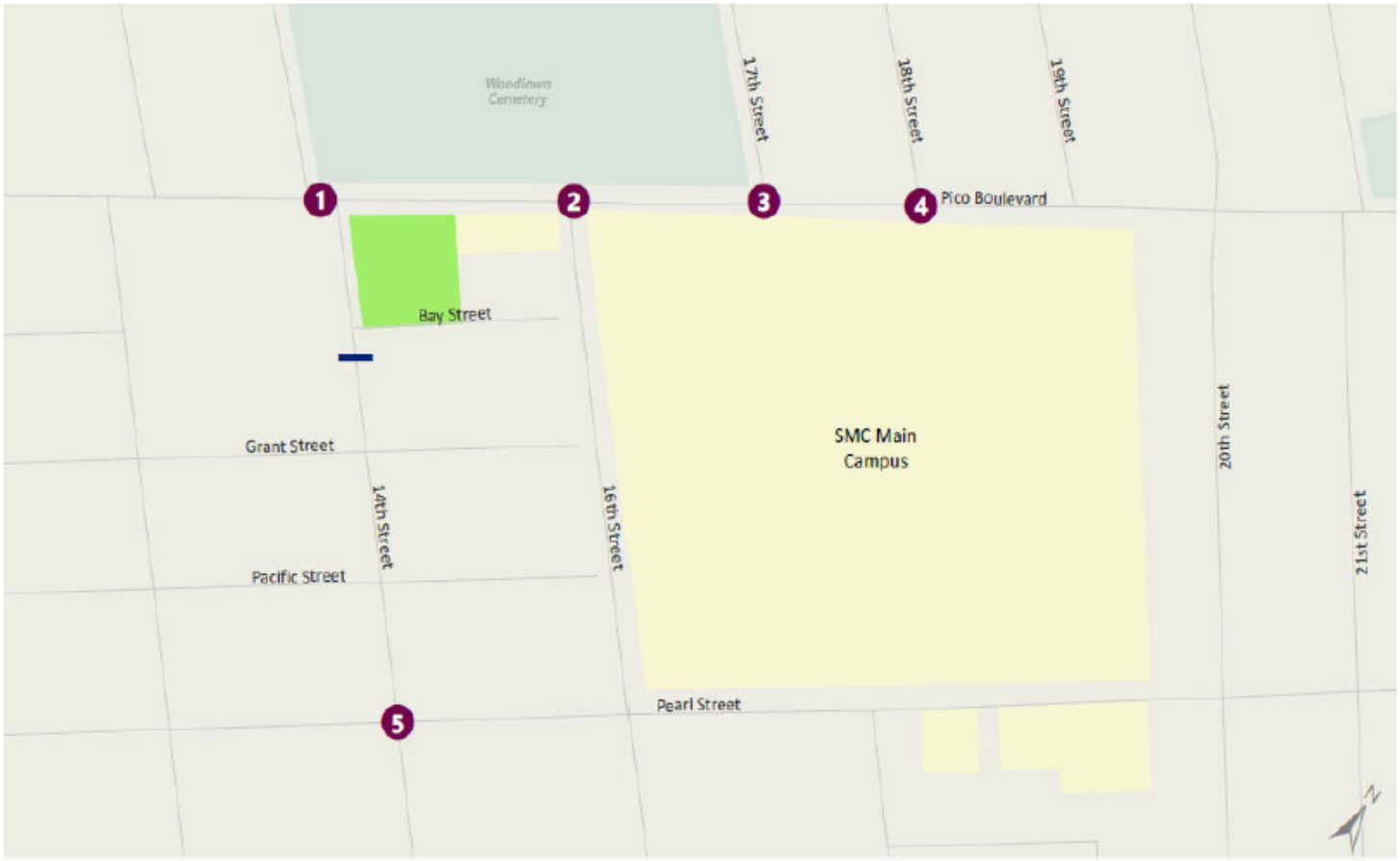
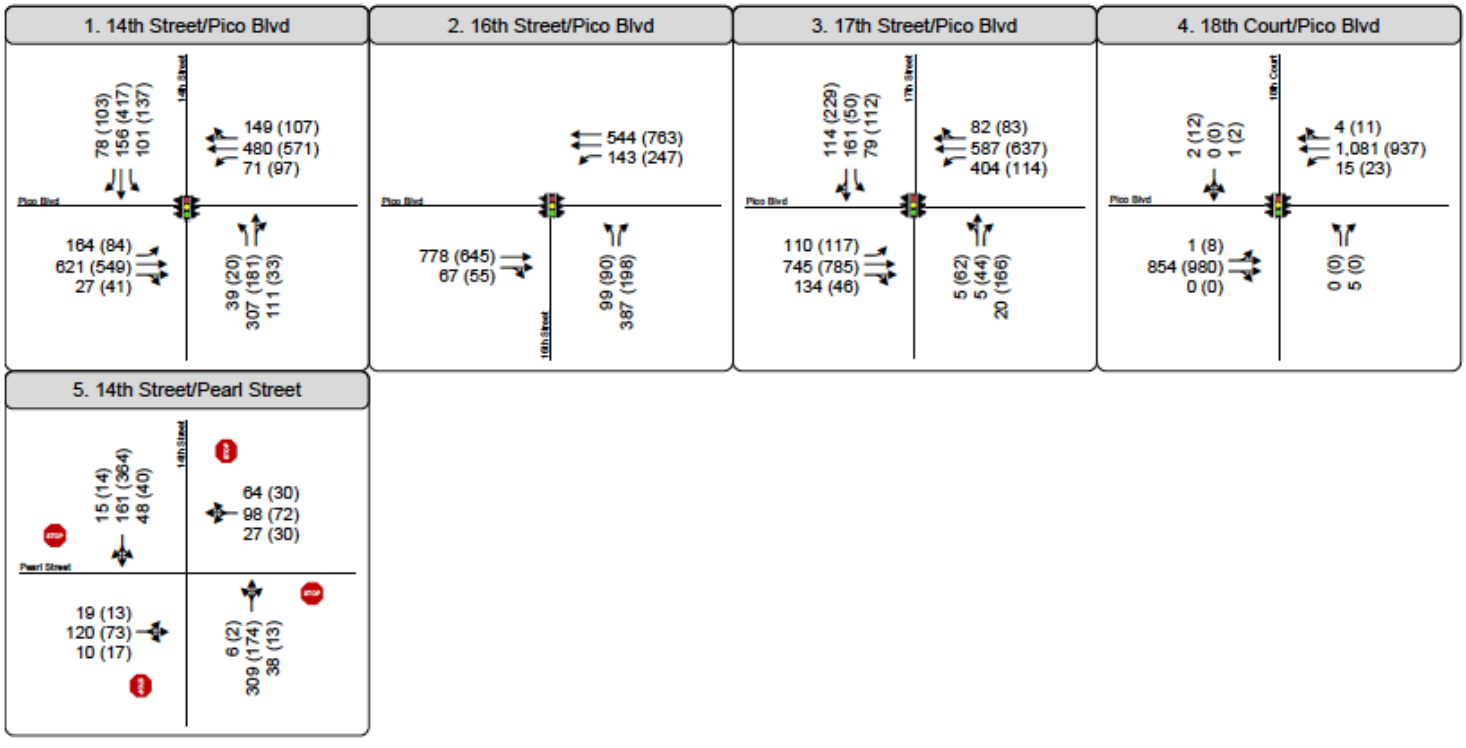
Figure 4.21
Peak Hour Traffic Volumes and Lane Configurations
Existing (2020) Plus Project - 14th Street Driveway Only





Source: Fehr & Peers, 2020.

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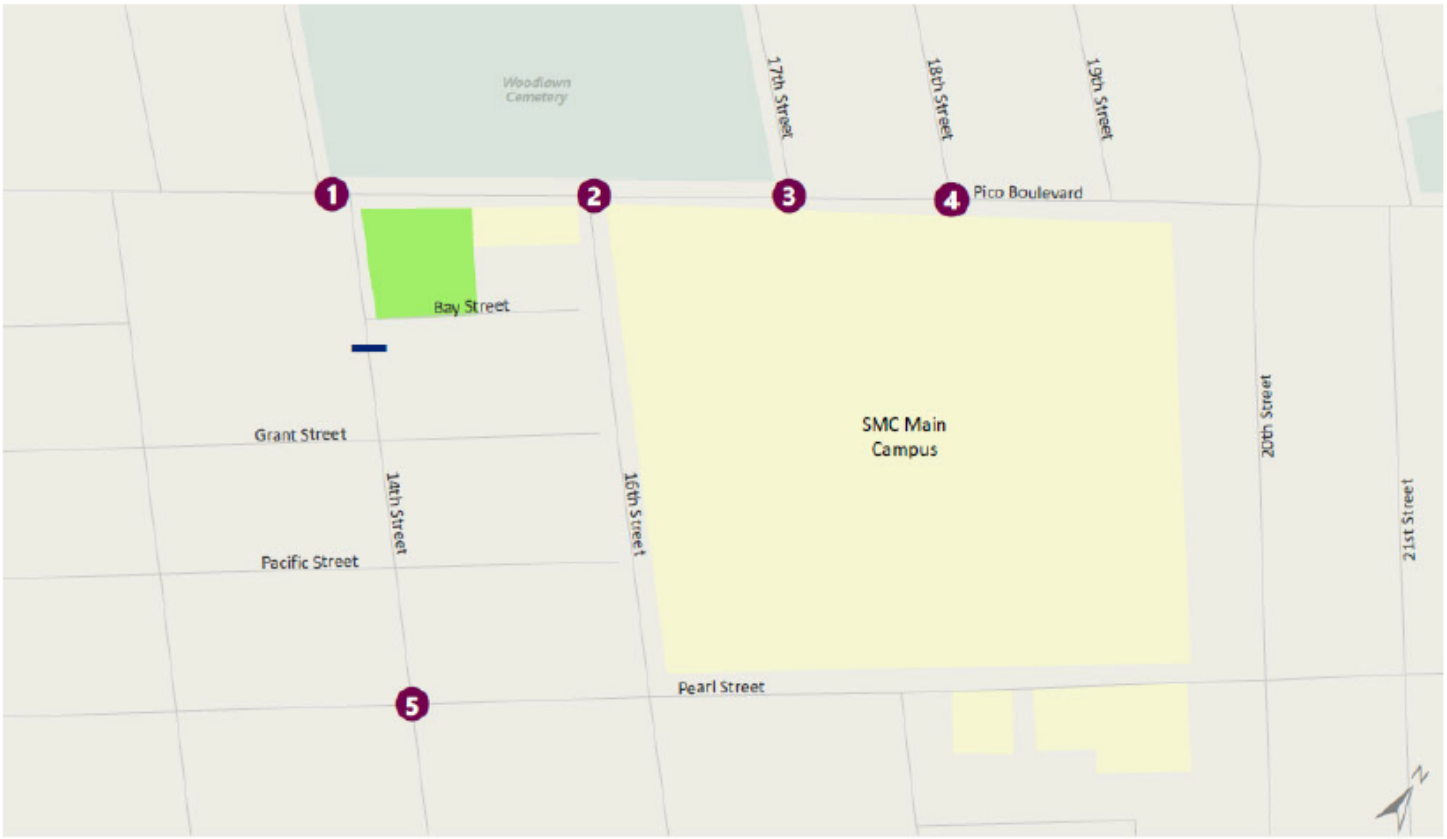
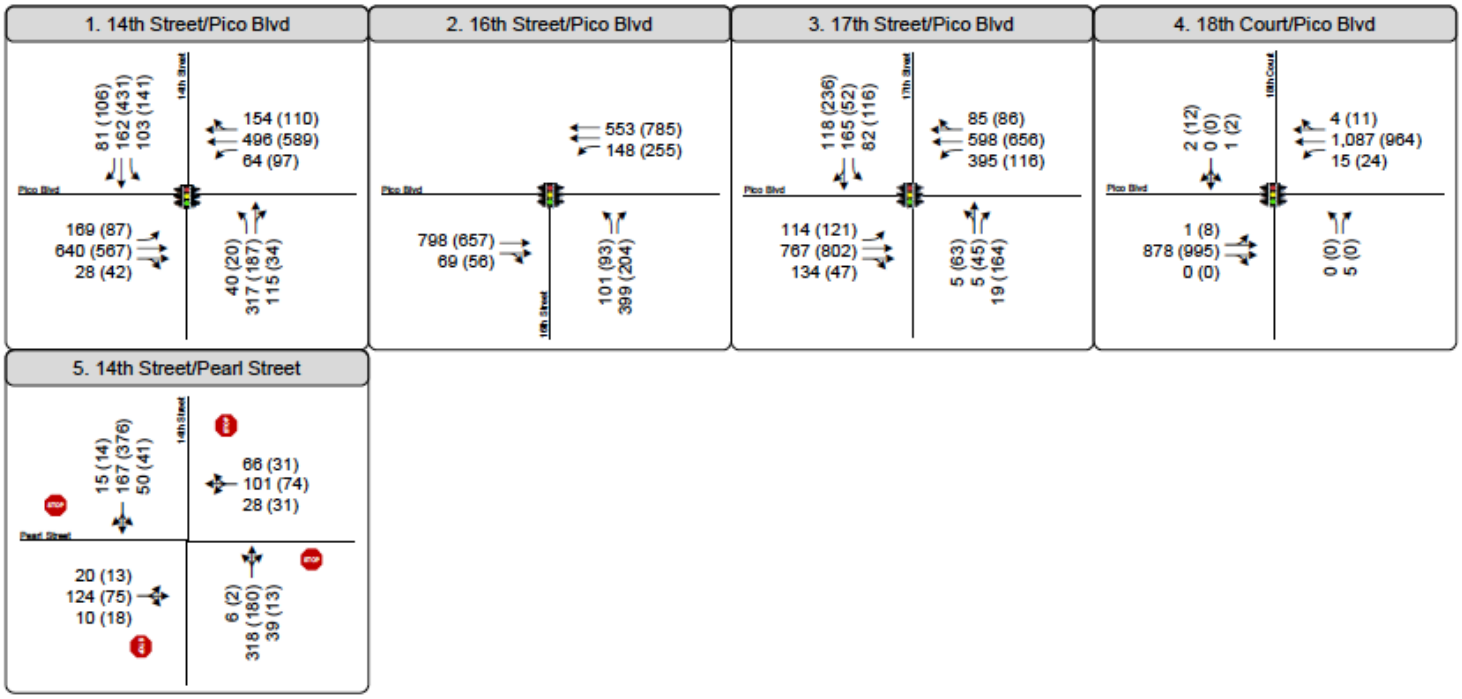
Figure 4.22
Peak Hour Traffic Volumes and Lane Configurations
Existing (2020) Plus Project - Pico Blvd and 14th Street Driveways





Source: Fehr & Peers, 2020.

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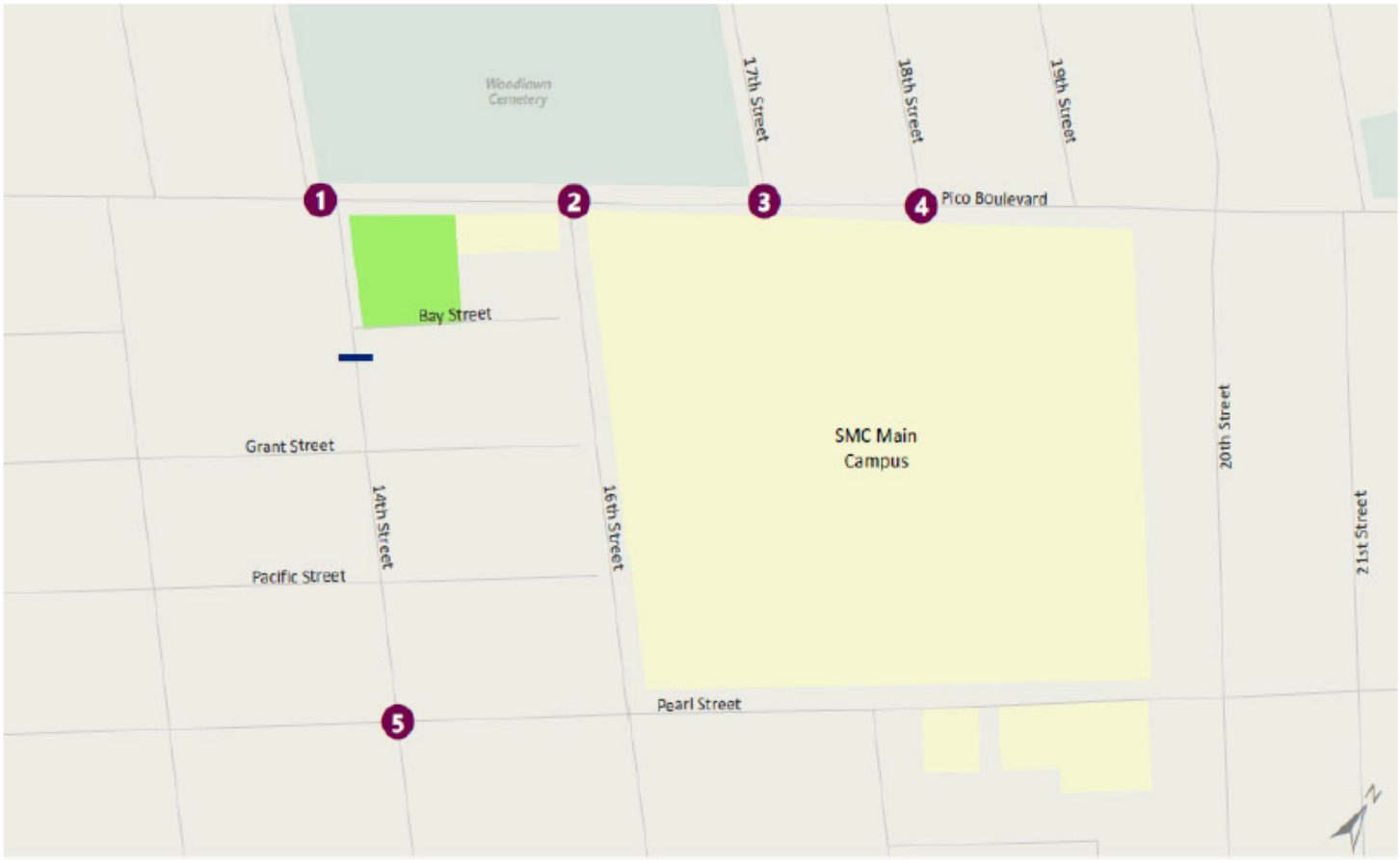
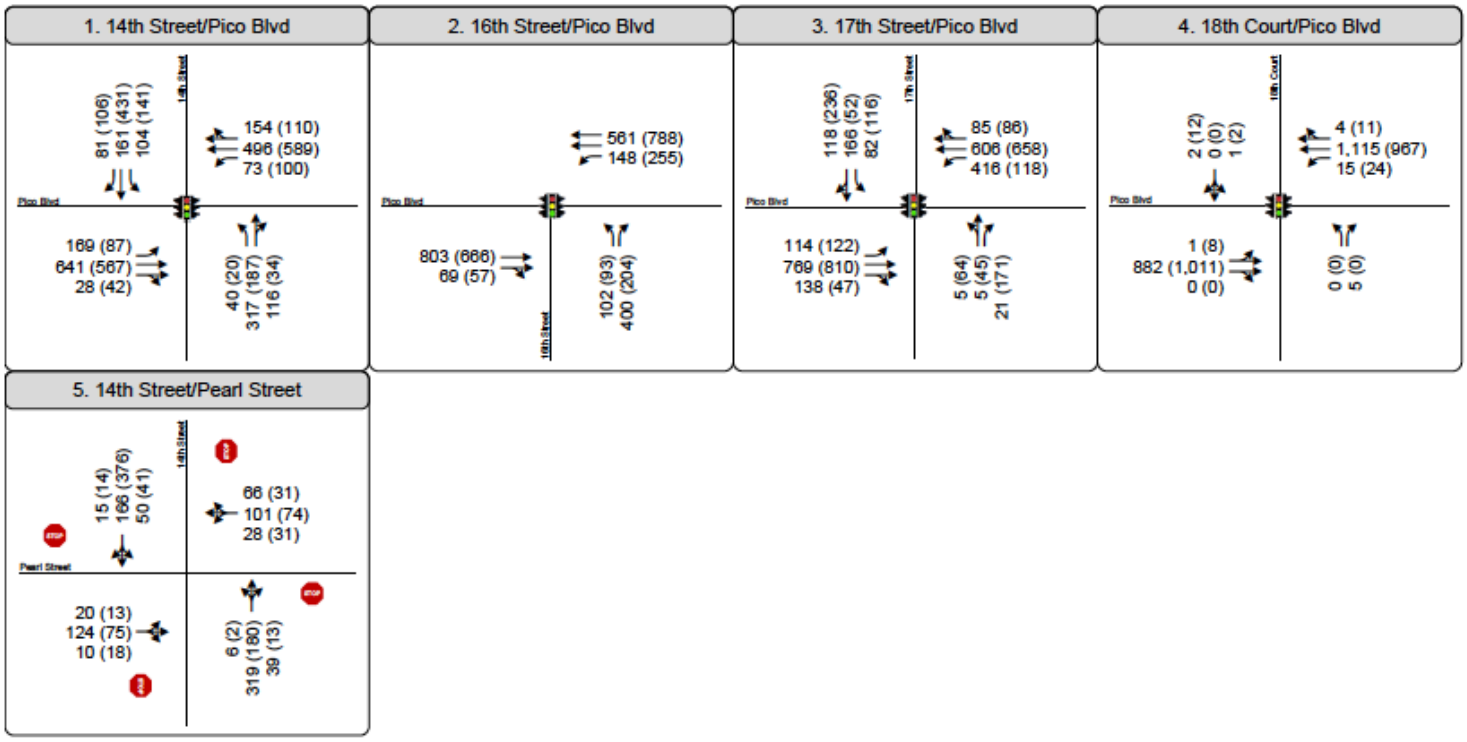
Figure 4.23
Peak Hour Traffic Volumes and Lane Configurations
Future Base (2020) Conditions





Source: Fehr & Peers, 2020.

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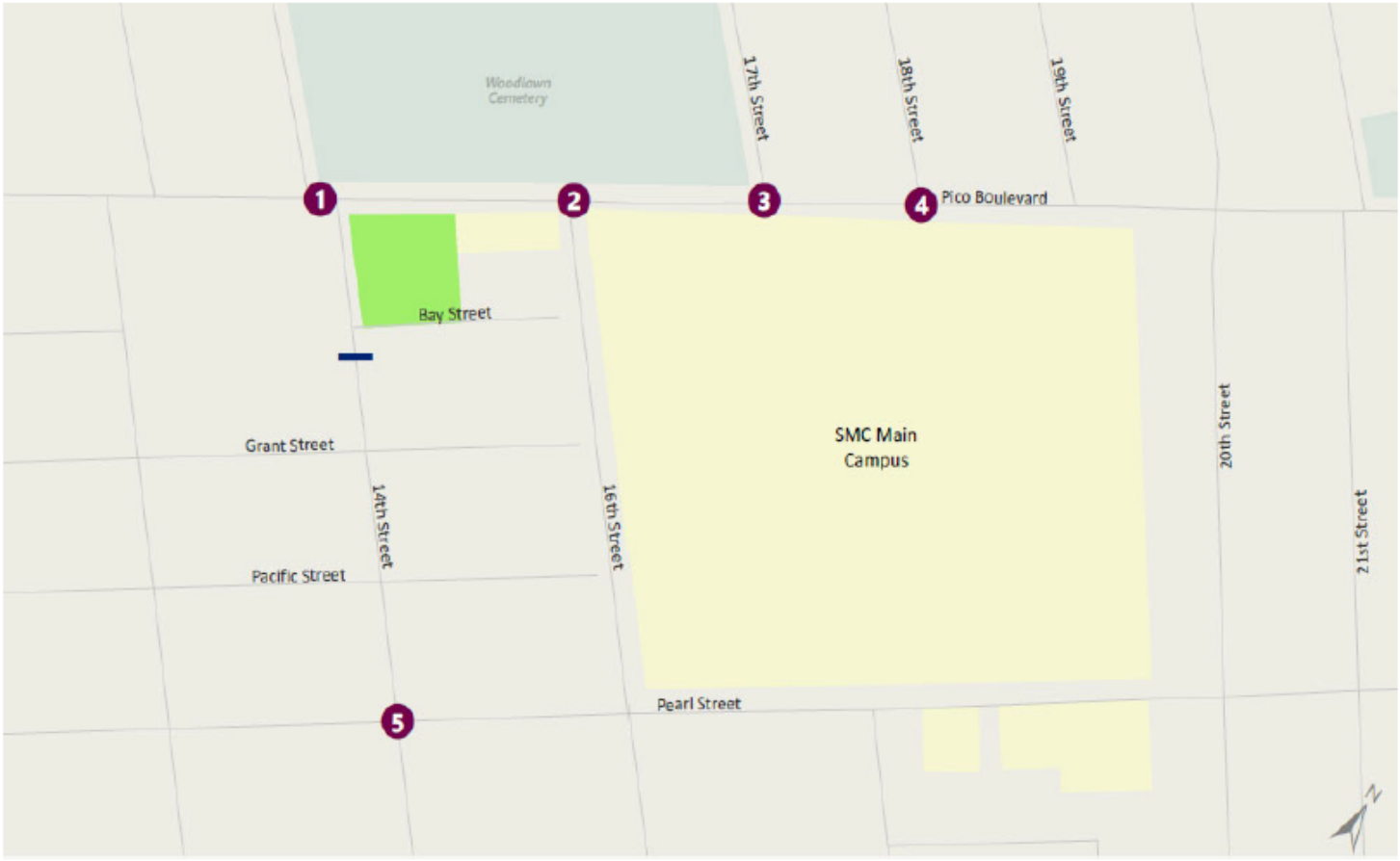
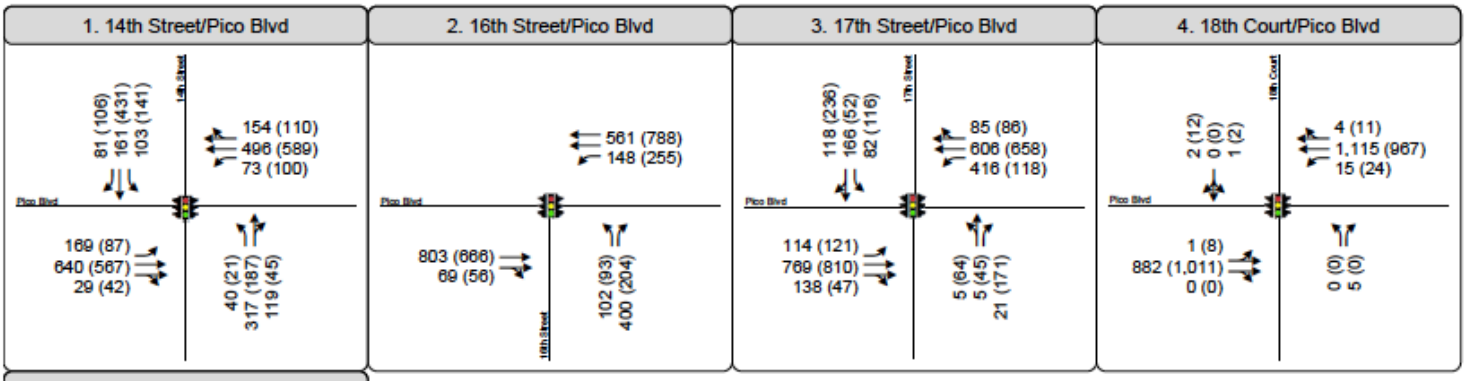
Figure 4.24
Peak Hour Traffic Volumes and Lane Configurations
Future (2024) Plus Project - Pico Blvd Driveway Only





Source: Fehr & Peers, 2020.

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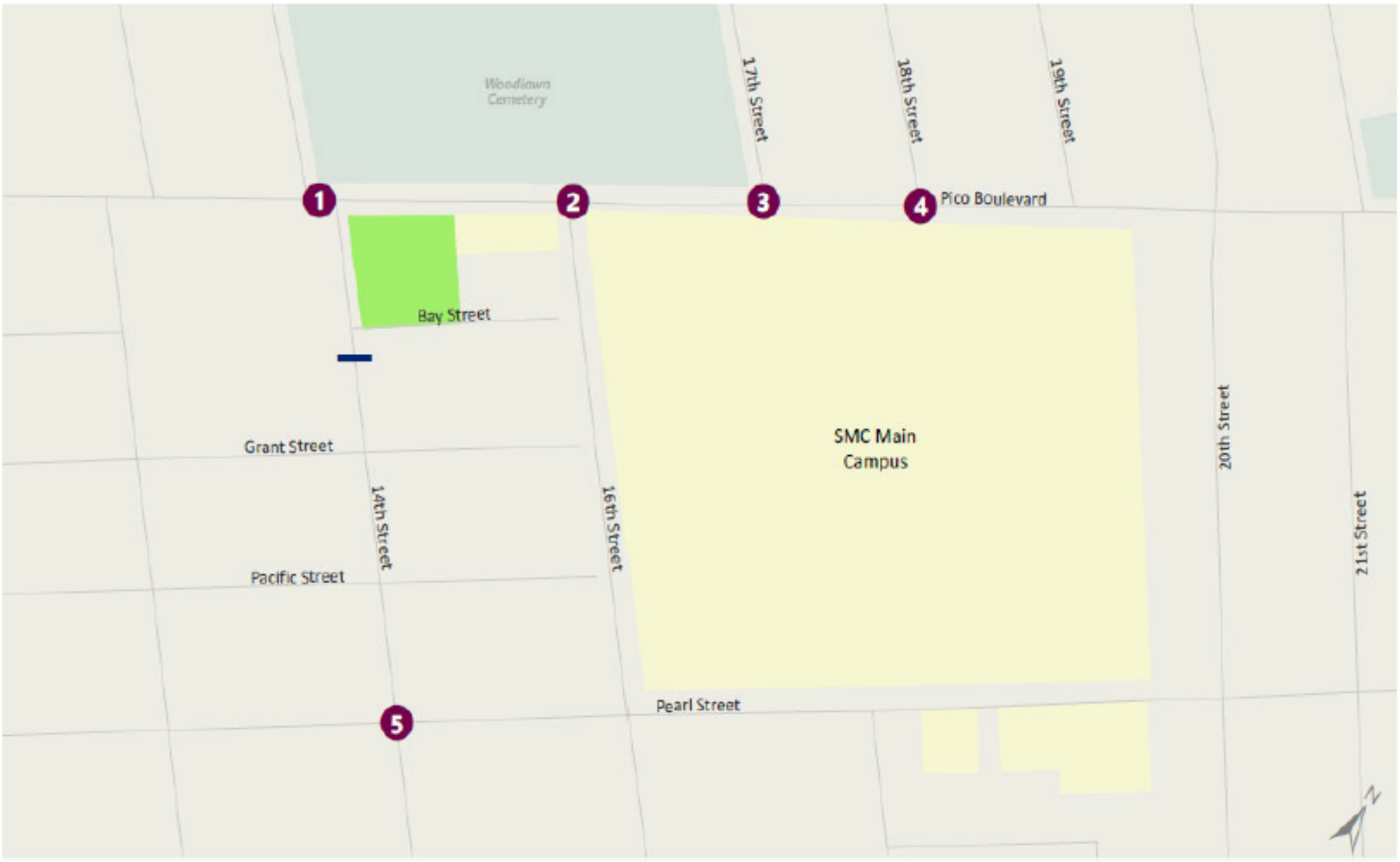
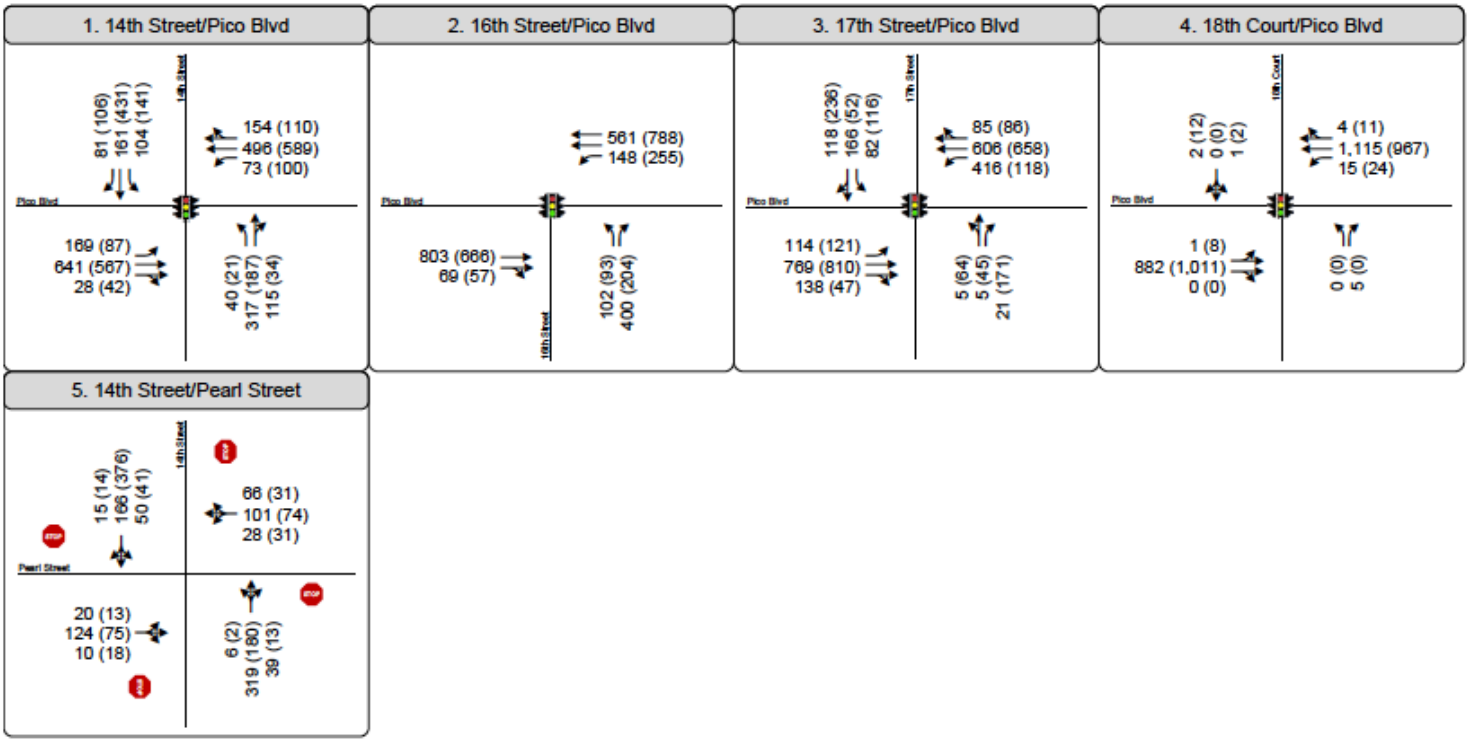
Figure 4.25
Peak Hour Traffic Volumes and Lane Configurations
Future (2024) Plus Project - 14th Street Driveway Only





Source: Fehr & Peers, 2020.

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Figure 4.26
Peak Hour Traffic Volumes and Lane Configurations
Future (2024) Plus Project - Pico Blvd and 14th Street Driveways

Traffic Impact Analysis

Significant Impact Criteria for Intersections

For the transportation study contained within the TIA, SMC has elected to follow the City of Santa Monica's significance criteria based on LOS and vehicle delay at intersections. Transportation impacts are also assessed on an adjacent street segment and by considering project-related changes in VMT, as discussed within Checklist Question 17(b), below. The City of Santa Monica is currently updating its analytical methods and thresholds of significance. The current intersection thresholds, summarized in Table 4.18, depend on the classification of the streets at the intersection (e.g., arterial, collector, or local street) and the operating conditions of the intersection under Cumulative plus Project traffic conditions.

Table 4.18
Significant Impact Criteria - Arterial and Collector Intersections

City of Santa Monica	
Base Scenario	**Plus Project Scenario ***
If LOS + A, B, or C	**Significant Impact if:**
== and is a collector street intersection	Average vehicle delay increase is ≥ 15 seconds or LOS becomes D, E, or F
== and is an arterial intersection	Average vehicle delay increase is ≥ 15 seconds or LOS becomes E or F
If LOS = D	**Significant Impact if:**
== and is a collector street intersection	Average net increase in average seconds of delay per vehicle
== and is an arterial intersection	Average vehicle delay increase is ≥ 15 seconds or LOS becomes E or F
If LOS = E	**Significant Impact if:**
== and is a collector or arterial intersection	Average net increase in average seconds of delay per vehicle
If LOS = F	**Significant Impact if:**
== and is a collector or arterial intersection	HCM V/C ratio net increase is ≥ 0.005

*Notes: * Functional street classifications for Santa Monica Intersections in this table are from the City's previous Circulation Element. The 2010 Land Use and Circulation Element (LUCE) has adopted a different typology for streets within the City but the significance criteria have not yet been revised.*
Source: Fehr & Peers, Santa Monica College Arts Complex Transportation Impact Assessment, April 29, 2020.

Although street classifications were updated in the 2010 LUCE, for the TIS, streets are classified as arterials, collectors and local streets because these are the categories used in the City's adopted intersection thresholds of significance. The potential significance of a project's impact is measured by either the change in average vehicle delay (measured in seconds) or by a change in the intersection operating conditions to unacceptable conditions. If the projected LOS is F, however, significance is defined in terms of a change in the V/C ratio (as calculated by the HCM operational method). No intersections operate at LOS F in the TIA.

Intersection Impact Analysis

As shown in Table 4.16 and Table 4.17, above, the changes in delay due to the estimated shifts in trips caused by the Proposed Project range from zero to two seconds and the intersections are projected to operate at LOS D or better. Applying the threshold criteria presented above to the LOS analysis summarized in these tables, it is concluded that none of the five analyzed intersections would be significantly impacted by development of the Proposed Project.

Segment Analysis

Because of the Project Site's location near a residential neighborhood, an analysis of the Proposed Project's potential impacts on a street segment in the Project vicinity is presented. The analysis was conducted on 14th Street south of Bay Street, south of the Project Site.

The City of Santa Monica impact criteria used to evaluate potential traffic impacts on street segments are based on the existing ADT volumes and the projected level of volume increase that can be attributed to the project. The City's significance criteria were not updated to reflect LUCE street classifications. 14th Street is currently classified as a Minor Avenue and, prior to adoption of the LUCE, was classified as a collector. The City's current significance criteria for collector, feeder, and local streets are provided in Table 4.19, below.

For the traffic analysis in the TIA, SMC has elected to follow the City of Santa Monica's significance criteria, which is based on the change in daily traffic on this street segment. Existing weekday and weekend average daily traffic (ADT) volume data was collected at the street segment in February 2020 when SMC was in normal session. The ADT on this segment is 7,603. The existing daily traffic counts are provided in Attachment B of the TIA. Based on this ADT and the street's classification as a collector, any addition of one or more trips by the project results in a significant impact.

Table 4.19
Street Segment Significant Impact Criteria – Collector, Feeder, and Local Streets

Collector Streets	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	greater than 13,500 and there is a net increase* of one trip or more in ADT due to project related traffic
	greater than 7,500 but less than 13,500 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 13,500 or more
	less than 7,500 and the project related traffic increases* the ADT by 25%
Feeder Streets	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	greater than 6,750 and there is a net increase* of one trip or more in ADT due to project related traffic
	greater than 3,750 but less than 6,750 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 6,750 or more
	less than 3,750 and the project related traffic increases* the ADT by 25%
Local Streets	
A transportation impact is significant if the Base Average Daily Traffic Volume (ADT) is:	greater than 2,250 and there is a net increase* of one trip or more in ADT due to project related traffic
	greater than 1,250 but less than 2,250 and the project related traffic increases* the ADT by 12.5% or the ADT becomes 2,250 or more
	less than 1,250 and the project related traffic increases* the ADT by 25%

*Notes: * Average Daily Traffic Volume "increase" denotes adverse impacts; "decrease" denotes beneficial impacts.*
Source: Fehr & Peers, Santa Monica College Arts Complex Transportation Impact Assessment, April 29, 2020.

The existing daily traffic volumes on the street segments include the trips generated by SMC that may be using Lot 6 or other parking facilities at SMC. The changes in traffic expected as a result of the Proposed Project are described above in the sections on trip generation and trip distribution. Lot 6 on the Project Site is currently served by one active right-in/right-out driveway, located on Pico Boulevard, similar to the preferred driveway alternative.

The trip assignment assumes that most trips that are altered by the Proposed Project would have the same general paths to and from their destination at SMC. That is, a trip previously using 14th street to access Lot 6 would continue to use 14th Street to access their new destination in parking structure 3 or 4. Or, a trip currently using 20th Street to access Lot 1 would continue to use 20th Street to access the parking at the Project Site.

In this way, there are minimal changes to the ADT on 14th Street with the addition of the project.

As discussed, the Proposed Project generally does not alter trip paths, other than their "last-mile" on Pico Boulevard. The exception to this pattern is the alternative with a driveway only on 14th Street. If access were provided only on 14th Street, it is anticipated that some trips coming from south of the Project Site that would have previously accessed Pico Boulevard using a street further west, would choose to use 14th Street instead.

The driveway alternative that provides access to the Project Site only on 14th Street is the only alternative that adds one or more trips (adds 7 trips) to this segment and therefore has a significant segment impact. The alternative with a driveway only on 14th Street is not proposed and was evaluated for study purposes only. The alternative with a driveway only on Pico Boulevard and the alternative with driveways on both Pico Boulevard and on 14th Street, both result in no change in traffic volume (adds 0 trips) and therefore do not have segment impacts. Table 13 in the TIA shows the segment analysis for Existing plus Project conditions for all three driveway alternatives.

Construction Impacts

The Proposed Project is anticipated to be constructed over a period of approximately 24 months for completion anticipated in the Year 2023. The construction period would include sub-phases of demolition/site clearing, grading/excavation, building construction, and architectural coatings. Peak haul truck activity would occur during the grading/excavation phase, and peak worker activity would occur during building construction.

A detailed Construction Impact Mitigation Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to all applicable City Departments for review and approval. The Construction Impact Mitigation Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. Refer to Mitigation Measure MM-TR-1, below. The implementation of the Mitigation Measure MM-TR-1 would mitigate any traffic impacts from construction to less than significant.

Mitigation Measures:

MM-TR-1: Construction Impact Mitigation Plan

A detailed Construction Impact Mitigation Plan, including street closure information, detour plans, haul routes, and staging plans, would be prepared and submitted to Public Works Department, SMFD, Planning and Community Development (Transportation Engineering and Management Division), and SMPD for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Impact Mitigation Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and should include the following elements as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition of construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. In preparing studies pursuant to CEQA, SMC has used the transportation analysis methods and impact thresholds of the City of Santa Monica and, as appropriate, other jurisdictions where analyzed projects were located. The City of Santa Monica is in the process of updating its procedures and impact criteria

pursuant to the requirements of Senate Bill (SB) 743, which requires use of VMT as the primary transportation impact metric. Under SB 743, lead agencies have until July 1, 2020 to begin using VMT as the primary transportation impact metric. As mentioned previously, because the City has not yet adopted local VMT significance thresholds, current environmental studies provide an analysis of LOS to assess the significance of transportation related effects but also, for informational purposes, a VMT analysis for the Proposed Project is provided. Recent EIRs (such as the Miramar Hotel Project EIR) in the City more fully describe the current status of the City's process in developing new transportation impact thresholds.

Pursuant to SB 743, the Governor's Office of Planning and Research (OPR) released final technical guidelines in December 2018 on VMT analysis. In this Technical Advisory, OPR provides its recommendations to assist lead agencies in screening out projects from VMT analysis and selecting a significance threshold that may be appropriate for their jurisdiction.

Furthermore, state law was amended to include a new section, Section 15064.3 (b) (1), which provides criteria for analyzing transportation impacts. It states that for land use projects, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor [HQTC] should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the Project area compared to existing conditions should be presumed to have a less than significant transportation impact." The following sections provide for qualitative analysis of VMT, "if existing models or methods are not available to estimate the vehicle miles traveled for the particular Project being considered" and explicitly state that, "a lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled."

For this study SMC has elected to provide a qualitative assessment of project-related changes in VMT and is providing this for informational purposes.

The Proposed Project proposes to replace existing facilities on the Main Campus and at the Airport Arts Campus with a consolidated new facility adjacent to the Main Campus. The size of the new facility, in ASF, would be equivalent to the combined size of the two facilities that it would replace. Because the Proposed Project would relocate existing programs to the new facility but would not expand existing programs, no increase in student enrollment or staffing is anticipated by SMC. For this reason, no additional trips are expected to occur. Therefore, no new VMT would be generated by the Proposed

Project. The Airport Campus is located approximately one and one-half miles south of the Main Campus. While the Transportation Study does not quantify the intercampus trips that would be eliminated by the Proposed Project, relocating the classes held there to the Project Site would eliminate the trips currently being made between the two campuses. Thus, it can be argued that the Proposed Project would tend to reduce VMT by consolidating these functions to a single facility adjacent to the Main Campus and can be presumed to have a less-than-significant transportation impact.

The statute cited above allows for screening of land use projects based on proximity to a major transit stop or a stop along a HQTC. Big Blue Bus 7 and Big Blue Bus Rapid 7 bus lines operate with a frequency of 15 minutes or less during the peak periods; therefore, Pico Boulevard can be considered a HQTC. Because the Proposed Project lies within half a mile of the Route 7 stop at 14th Street and the Route 7 Rapid stop at 18th Court, the Proposed Project may be presumed to have a less-than-significant transportation impact. While a qualitative analysis is provided for informational purposes when analyzing VMT, it would support a conclusion that the transportation impact of the Proposed Project would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features.

Current vehicular access is provided by one right-in/right-out driveway along Pico Boulevard. Another full-access driveway for the Proposed Project would be provided along 14th Street, but that second driveway would be utilized for emergency and loading purposes only. The width of the driveways and internal circulation patterns would conform to all building design standards. The circulation aisle widths of the parking areas are designed to allow adequate and safe circulation of vehicles without significant conflicts. The Proposed Project would not introduce new driveways with vehicular access to the Project Site, since vehicular driveways already exist where the Proposed Project's driveways are proposed. Therefore, the Proposed Project does not include any hazardous design features, and impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the SMFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section 9(f), the Project Site is not located in a disaster route according to the City of Santa Monica Disaster Route Map of Los Angeles County.[38] Although temporary lane closures may be required on Pico Boulevard and 14th Street during Project construction, emergency access to the Project Site would be maintained at all times during construction. Additionally, construction activities would not be expected to substantially interfere with emergency response or evacuation plans. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Moreover, the Proposed Project would be subject to the site plan review requirements of the SMFD and the SMPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Related projects would result in a cumulative increase in average daily vehicle trips and peak hour vehicle trips in the Santa Monica Area. The Proposed Project does not generate new trips for SMC, rather it causes trips the shift to different parking structures on the Main Campus and the Project site. As noted in Question 17(a), above, the Proposed Project would not result in a significant cumulative impact for the Future plus Project projections for the year 2024 for all of the study intersections analyzed. All increases in LOS and V/C ratios in the AM peak hour and PM peak hour would be less than the threshold for a significant impact to occur and the Proposed Project's contribution to cumulative impacts is less than significant. Additionally, as noted in Question 17(b), above, the Proposed Project would not be expected to increase in overall VMT resulting in a less than significant impact. Therefore, the Proposed Project's contribution to cumulative impacts is less than significant and would not be cumulative considerable. Therefore, the Proposed Project's cumulative transportation impact is considered less than significant.

[38] *Los Angeles County Department of Public Works, City of Santa Monica Disaster Route Map, August 13, 2008.*

18. Tribal Cultural Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public 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: 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. As noted above, the Proposed Project would require excavations to a depth of approximately 12 feet below grade for the one level subterranean space. As such, it is possible that unknown tribal cultural resources could be discovered on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

Public Resources Code Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource is 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 if such resource is 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. Public Resources Code 5024.1(c) states that "[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

2. Is associated with the lives of persons important in our past.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question 5.b (Cultural Resources, Archeological Resources), the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[39] The Project Site is located in a highly urbanized area of the City of Santa Monica, and has been partially disturbed by past development activities along with associated control/maintenance of the recent existing buildings. The Proposed Project would involve the grading of 32,000 cy of soil export for development of one level of subterranean space. Thus, the potential exists for the accidental discovery of archaeological materials associated with native American tribes. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction

[39] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

activity. Any potential impacts upon archaeological resources would be less than significant with adherence to Mitigation Measure MM-TCR-1, below, and all applicable regulations including those set forth in California Public Resources Code Section 21083.2.

TCR-1: In the event that any suspected Tribal Cultural Resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 50-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be retained to assess whether the find is of tribal origin. The Gabrieleño Band of Mission Indians – Kizh Nation shall be contacted if any such find occurs. The qualified archaeologist shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to the Lead Agency, and tribal representatives from the Gabrieleño Band of Mission Indians – Kizh Nation. The Lead Agency shall, in good faith, consult with the tribal representative on the disposition and treatment of any Tribal Cultural Resource if encountered during the project grading.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A 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. The Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Based on the Project Site's prior soil disturbance and lack of any known Native American resources or cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. With implementation of Mitigation Measure TCR-1, referenced above, impacts to tribal cultural resources remain less than significant during Project construction.

Cumulative Impacts

Less Than Significant Impact. Additionally, compliance with standard conditions of approval and regulatory requirements would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. It is unknown whether or not any of the properties on which the related projects are located contain tribal cultural resources. However, similar to the Proposed Project, each of the related projects would be required to follow the regulatory requirements of Assembly Bill 52, as applicable, which includes notifying tribes to solicit consultation and to analyze and mitigate potential impact of tribal cultural resources. Any related project sites that contain tribal cultural resources would be required to comply with conditions of approval and/or site-specific mitigation measures to avoid or substantially lessen potential impacts. Therefore, cumulative impacts would be less that significant.

19. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider 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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

Less Than Significant Impact. A significant impact may occur if a project would increase demands upon infrastructure to such a degree that the construction or relocation of facilities currently serving the Project Site would result in significant environmental impacts. The determination of whether a project results in a significant impact on water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities shall be made considering the following factors: (a) the total estimated demand for the project; (b) whether sufficient capacity exists in the infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; and (c) whether improvements or upgrades necessary to serve the project would result in significant environmental impacts.

Water Treatment Facilities and Existing Infrastructure

The City of Santa Monica Water Resources Division is a retail water agency providing water service throughout the City. The City of Santa Monica's potable water supply consists of local groundwater and imported water from the Metropolitan Water District of Southern California (MWD). The City of Santa Monica currently obtains approximately 75 percent of its water from local groundwater wells within the City and in West Los Angeles. The City extracts its water from three sub-basins within the Santa Monica Basin (Charnock, Olympic, and Arcadia Sub-basins). The remaining 25 percent of Santa Monica's drinking water is purchased from Metropolitan Water District (MWD).

Additionally, non-potable water for irrigation is produced from the Santa Monica Urban Runoff Recycling Facility (SMURRF), which treats dry weather urban runoff.[40]

Groundwater is treated at the Santa Monica Water Treatment Plant (Treatment Plant), which is owned and operated by the City of Santa Monica. Currently, the City uses an average of 12 million gallons of water per day (mgd). The Santa Monica Treatment Plant provides a total of about 8.5 mgd of treated water. Additional water needed to meet the City's daily needs will continue to be purchased from the Metropolitan Water District of Southern California until such time as Santa Monica can become self-sufficient in its water supplies.

As shown in Table 4.20, the Proposed Project would generate a net increase in water demand by approximately 2,279 gallons per day (gpd) of water. This demand would not be a significant increase when compared to the projected 2024 (Project buildout year) water demand for the City of 14,035 acre feet per year (afy) during a "multiple dry years" scenario, which the City has excess capacity to accommodate.[41] Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

Table 4.20
Proposed Project Estimated Water Demand

Type of Use	Size [a]	Water Demand Rate (gpd/unit) [b]	Total Water Demand (gpd)
Proposed Project			
Classrooms and Laboratories	19,028 sf	0.11 gpd/sf	2,093
Office	1,692 sf	0.11 gpd/sf	186
		Net Water Demand	**2,279 gpd (2.5 AFY)**

Notes:
sf =square feet
[a] *Student enrollment based on Fall 2019 enrollment and assumes no increase in current student enrollment.*
[b] *Consumption Rates based on Santa Monica Land Use and Circulation Element EIR, Table 4.13-5, 2010.*
Source: Parker Environmental Consultants, 2020.

[40] *City of Santa Monica Water Resources Division, Annual Water Quality Report, June 2019, website: https://www.smgov.net/uploadedFiles/Departments/Public_Works/Water/WaterQualityReport.pdf, accessed March 2020.*

[41] *City of Santa Monica, 2015 Urban Water Management Plan, June 2016, Table 5.6, City of Santa Monica Water Supply Availability & Demand Projections, website: https://www.smgov.net/uploadedFiles/Departments/Public_Works/Water/2015_UWMP_Final_June_2016.pdf, accessed March 2020.*

The Proposed Project would require local connections to existing water mains and/or other infrastructure upgrades for the proposed development. Such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, with implementation of mitigation measure MM-UTIL-1, below, potential impacts resulting from water infrastructure improvements would be less than significant.

MM-UTIL-1: Prior to the issuance of the first building permit, the College shall submit a water study that shows that the City's water system can accommodate the entire development for fire flows and all potable needs. The College shall be responsible to upgrade any water flow/pressure deficiencies, to the satisfaction of the Water Resources Manager, if calculations show that the project will cause such mains to receive greater demand than can be accommodated. Improvement plans shall be submitted to the Engineering Division. All reports and plans shall also be approved by the Water Resources Engineer.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Santa Monica Public Works department provides sewer service to the Proposed Project Site area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the

plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[42] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table 4.21 below, the Proposed Project would generate a net decrease of approximately 2,157 gpd of wastewater, compared to existing conditions.

Pursuant to City policy, the Santa Monica Public Works will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. As noted in mitigation measure MM-UTIL-2, below, the Applicant would be required to submit a Sewer Capacity Study to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project. If the public sewer has insufficient capacity to accommodate the Proposed Project's wastewater flows, the Applicant would be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connect permit would be made at the time. The installation of a secondary line, if needed, would require minimal trenching and pipeline installation and would not result in any adverse environmental impacts. Ultimately, the sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project. Therefore, with implementation of mitigation measure MM-UTIL-2, the Proposed Project's impacts upon the City's sewer system would be less than significant.

MM-UTIL-2: Prior to commencement of any grading activities, the College shall prepare an updated sewer study to be reviewed and approved by the City of Santa Monica's Water Resources Engineer. Such study shall determine if future project flows will cause the City's sewer lines to exceed the hydraulic planning criteria in the City's Sanitary Sewer System Master Plan. If the study indicates exceedances of the hydraulic planning criteria due to project flows, the College shall perform sewer upgrades prior to issuance of a Certificate of Occupancy for the proposed building.

Stormwater Drainage Facilities

As described in Question 10(c), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first ¾-inch of rainfall in a 24-hour storm event.

[42] *Los Angeles Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afrLoop=10780400868530458#!, accessed August 2019.*

The Proposed Project Site is currently developed with surface parking and vacant land. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question 10(a), the Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Proposed Project.

Table 4.21
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Proposed Project			
Classroom and Laboratories	19,028 sf	0.1 gpd/sf	1,903
Office	1,692 sf	0.15 gpd/sf	254
	Total Project Wastewater Generation		**2,157**

Notes:
sf =square feet
[a] *The generation rate for office uses is based on the Santa Monica Land Use and Circulation Element EIR, 2010, Table 4.13-9. A generation rate is not provided for education uses (such as classroom and laboratories) and therefore wastewater generation for those land uses assumes that 90 percent of their water demand becomes wastewater, also based on the Santa Monica Land Use and Circulation Element EIR, 2010, page 4.13-42.*

The appropriate design and application of BMPs devices and facilities shall be determined by the Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, with implementation of mitigation measure MM-UTIL-3, below, Project impacts to stormwater drainage facilities would be considered less than significant.

MM-UTIL-3: Prior to the issuance of the first building permit, the College shall submit a hydrology study of all drainage to and from the site to demonstrate adequacy of the existing storm drain system for the entire development. The College shall be responsible to upgrade any system deficiencies, to the satisfaction of City Engineer, if calculations show that the project will cause such facilities to receive greater demand than can be accommodated. All reports and improvement plans shall be submitted to Engineering Division for review and approval. The study shall be performed by a Registered Civil Engineer licensed in the State of California.

Electricity

The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. Depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Project Applicant may be financially responsible for some infrastructure improvements necessary to serve the Proposed Project (e.g. installation of electric power facilities or service connections or adding a line extension on the public street). New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the Proposed Project.

Additionally, as discussed in Question 6(a) above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Proposed Project would be part of the total load growth forecast for the City of Santa Monica and has been taken into account in the planned growth of the City's power system. The Proposed Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems to reduce electricity demands on local electrical utilities. Electricity supplies from Clean Power Alliance are adequate to serve the Proposed Project, and any improvements to existing infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the Proposed Project impacts to local and regional electricity supplies and existing electrical facilities would be less than significant.

Natural Gas

The Southern California Gas (SoCalGas) Company manages the pipelines adjacent to the Project Site. If problems/deficiencies were to exist, appropriate actions (e.g. pressure betterments, natural gas supplies) would need to be initiated to solve problems. It is anticipated that the SoCalGas would be able to meet the natural gas demands of the proposed Project; however, a natural gas survey of equipment would be completed to identify if the current infrastructure would sustain the demand for the Proposed Project. Further, since natural gas supplies vary with time, the SoCalGas Company's ability to accommodate Proposed Project's demand for natural gas supplies can only be evaluated when the Proposed Project is approved.

Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Proposed Project would not require extensive infrastructure

improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Proposed Project. The Proposed Project would however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. “Hooking-up” disruptions cannot be determined until the actual natural gas demand is known. However, impacts associated with utility upgrades or additional connections would be temporary in nature and would not require new supply facilities.

As estimated above in Section 6, Energy, the Proposed Project’s net natural gas demands are estimated to be approximately 445,646 cubic feet (cf) per year. The natural gas consumption of 0.45 million cubic feet per year would represent a very small fraction of one percent of the SoCalGas’s existing natural gas storage capacity and therefore, would be well within the SoCalGas’s existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. The operation of the Proposed Project would not result in the increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the proposed Project would result in a less than significant impact to natural gas infrastructure capacity.

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

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the Proposed Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the City to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City’s water supply comes from local groundwater sources and the Metropolitan Water District (MWD) of Southern California. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD’s member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG’s RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, the Santa Monica Water Resources

Division will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the City's Water Resources Division will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 4.20, the Proposed Project would generate a net increase in water demand by approximately 2,279 gallons per day (gpd) of water. Through the 2015 UWMP, the City has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In July 2015, the City's Sustainable Water Master Plan set goals to reduce water usage to 20 percent below 2013 water use for each individual. High efficiency water closets, high efficiency urinals, water saving showerheads, and low-flow faucets must be installed in new construction. The flow rates of new plumbing fixtures and landscaping requirements must comply with the most stringent of the following: SMMC Chapter 7.16, Water Conservation, the Santa Monica Plumbing Code, and the 2019 California Green Building Standards Code (CAL Green). Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Santa Monica, would further increase the demand for potable water within the City of Santa Monica. Through the 2015 Urban Water Management Plan, the Water Resources Division has demonstrated that it can provide adequate water supplies for the City of Santa Monica through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the Santa Monica service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section 14, Population and Housing, the Proposed Project's would not result in substantial population or employment growth for

the City of Santa Monica subregion. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan.

c) 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. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on HWRP's capacity.

Local Wastewater Generation

Each related project would be required to submit a Sewer Capacity Study and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project will perform a study to ensure that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

Regional Wastewater Generation

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Santa Monica and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significant reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. Private haulers provide waste collection services for most commercial and institutional developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. The City is dedicated to achieving Zero Waste to maximize the recovery and reuse of commodities. Through ideas developed in the City's Zero Waste Plan, the City has implemented policies to reduce the amount of waste produced through the adoption of the Zero Waste Strategic

Operations Plan. The 2019 Zero Waste Plan Update, an update from the 2014 Zero Waste Plan, reviews the implementation status and outcomes of the waste reduction and diversion strategies included in the 2014 Zero Waste Plan. [43] State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. Currently, 79 percent of solid waste generated in the City is diverted through waste prevention, recycling, and composting, and 21 percent is disposed in landfills or waste-to-energy facilities. Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Santa Monica. To achieve zero waste, residents, businesses, and City facilities have to find ways to reduce waste being sent to landfills. There are other ways the City of Santa Monica Plans to curb waste, and the timeline for implementation of programs can be found in the Zero Waste Strategic Operations Plan.

Additionally, Santa Monica College Board of Trustees passed Board Policy 2480 Zero Waste Events. The Board of Trustees recognizes and affirms the economic and environmental benefit of Zero Waste Practices in diverting food waste from landfill. Zero Waste includes recycling but goes beyond recycling by taking a whole system approach to the vast flow of resources and waste through human society. Zero Waste maximizes recycling, minimizes waste, reduces consumption and ensures that products are made to be reused, repaired or recycled back into nature or the marketplace. Industry standard for Zero Waste is 90 percent diversion of waste, allowing for minor waste generation at events. In support of SMC's institutional commitment to sustainability, Zero Waste practices will be integrated into all college events where food and related materials are present.

The City of Santa Monica is served by numerous recycling facilities and landfills that serve the County of Los Angeles. The closest recycling facility is Southern California Disposal, located at 1908 Frank Street, approximately 1.6 miles northeast of the Project Site. All solid waste would be initially disposed to the Southern California Disposal. Then, it is assumed that solid waste that cannot be recycled or diverted would be hauled to the Sunshine Canyon Landfill, which accepts solid waste from the City of

[43] *City of Santa Monica, Zero Waste Plan Update, September 23, 2019, website: https://www.smgov.net/uploadedFiles/Departments/Public_Works/Solid_Waste/Santa%20Monica%20Zero%20Waste%20Plan%20Update%20FINAL.pdf, accessed March 2020.*

Santa Monica. The Sunshine Canyon Landfill has a remaining capacity of 65.3 million tons and has an estimated remaining life of 19 years.[44]

Construction

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the calculations provided in Table 4.22, it is estimated that the proposed construction activities would generate approximately 694 tons of debris during the demolition and construction process that would be exported to a landfill that serves the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Santa Monica, the Applicant's contractor would be required to obtain an AB 939 Compliance Permit from the Bureau of Sanitation certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility.

Table 4.22
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate	Generated Waste (tons)
Demolition			
Surface Asphalt	28,460 sf	2,400 lbs/cy	632
Construction			
Project Site Gross Lot Area	31,877 sf	3.89 lbs / sf [a]	62
		Total Debris:	**694**

Notes: sf= square feet; lbs / sf = pounds per square foot
[a] *Pounds per square foot generation rate based on the USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, Chapter 2, Table 4: Estimated Generation of Non-Residential Construction Debris, June 1998.*
[b] *It is assumed that existing asphalt would be approximately ½-foot beneath grade.*
Source: Parker Environmental Consultants, 2020.

[44] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019.*

Operation

As shown in Table 4.23, below, Estimated Operational Solid Waste Generation, the Proposed Project's net increase in solid waste generation during operation of the Proposed Project would be 1,165 pounds per day or approximately 207 tons per year. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and Project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

Table 4.23
Estimated Operational Solid Waste Generation

Type of Use	Size [b]	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Proposed Project			
Classroom and Laboratories	2,310 stu	0.5 lbs/stu/day	1,155
Office	1,692 sf	0.006 lbs/sf/day	10
		Total Project Solid Waste Generation:	**1,165**

Notes: sf = square feet; stu= students
[a] *Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *The generation factors for Office and Classroom and Laboratories (Educational Facilities in CalRecycle) was taken from CalRecycle's Estimated Solid Waste Generation Rates website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed March 2020.*
Source: Parker Environmental Consultants, 2020.

The Proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure and is within the available capacities of area landfills. Therefore, the Proposed Project's impacts to solid waste generation would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes

an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

In addition, in 2014, the City of Santa Monica adopted a Zero Waste Strategic Operations Plan, with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

The Proposed Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City's Zero Waste Strategic Operations Plan. The Proposed Project would also comply with AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the

Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2018 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 176.1 million tons in the year 2033 will exceed the 2018 remaining permitted Class III landfill capacity of 163.4 million tons.[45] However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the Zero Waste Strategic Operations Plan sets forth strategies that would provide adequate landfill capacity to accommodate anticipated growth. The City requires all development to participate in recycling and organics programs. The City has developed programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of

[45] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, page 39, December 2019.*

solid waste deposited in area landfills. Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

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

Responses a through d: No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. According to CalFire, Office of the State Fire Marshal, Santa Monica is not listed among the cities for which CalFire has made recommendations on Very High Fire Hazard Severity Zones.[46] As shown on

[46] *CalFire, Office of the State Fire Marshall, Fire Hazard Severity Zone Maps, website:*

the statewide version map, Santa Monica is not located in a wildfire hazard zone.[47] Therefore, this checklist question is not applicable to the Proposed Project and no impact would occur.

21. Mandatory Findings of Significance

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

https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/, accessed January 2020.

[47] *CalFire, Office of the State Fire Marshall, Fire Hazard Severity Zone Maps, State Responsibility Area (SRA), adopted November 2007, PDF. Website: https://osfm.fire.ca.gov/media/6636/fhszs_map.pdf, accessed January 2020.*

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

Less Than Significant Impact with Mitigation. A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California's history or pre-history. As noted in the analysis above, the Project Site is developed with a surface parking lot and vacant land and does not support any substantial habitat of a fish or wildlife species. Vegetation on the site is limited to ornamental trees on-site. Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

Additionally, no known direct impacts to historic resources are anticipated on the Project Site. Implementation of MM-ARCHAEO-1, ARCHAEO-2 and TCR-1 and compliance with existing regulations would ensure any impacts upon cultural resources are reduced to a less than significant level in the unlikely event any such historic, archaeological, or tribal cultural materials are accidentally discovered during the construction process. With respect to paleontological resources, with implementation of MM-PALEO-1, any impacts to paleontological resources would be less than significant. Therefore, with mitigation, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

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. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be

significant when viewed together. As concluded in the cumulative impact analysis provided under each Checklist Question above, the Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. As such, the Proposed Project's contribution to cumulative impacts would be less than significant.

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation. Thus, with mitigation, any potentially significant impacts to humans would be less than significant.

Section 5. Preparers and Persons Consulted

Lead Agency

Santa Monica Community College District
1900 Pico Boulevard
Santa Monica, CA 90405

Charlie Yen, Director of Facilities Planning, Santa Monica College
Don Girard, Senior Director, Government Relations and Institutional Communications

Project Applicant

Santa Monica Community College District
1900 Pico Boulevard
Santa Monica, CA 90405

Project Architect

Grimshaw Architects
1308 Factory Place
Los Angeles, CA 90013

LITTLE | Diversified Architectural Consulting
1300 Dover Street, Suite 100
Newport Beach, CA 92660

Environmental Consultants

Parker Environmental Consultants
23822 Valencia Boulevard, Suite 301
Santa Clarita, California 91355

Shane E. Parker, President
Elise Lorenzana-Cronkrite, Senior Environmental Planner
Adrianna Gjonaj, Environmental Planner
Rachel Mills-Coyne, Assistant Environmental Planner

Hazardous Materials Consultants

Ellis Environmental Management, Inc.
430 Silver Spur Road, Suite 201
Rancho Palos Verdes, CA 90275

Duane E. Behrens, President

Wayne Perry Inc. | Consulting, Construction, Engineering, Maintenance
8281 Commonwealth Avenue
Buena Park, CA 90621

Traffic Consultant

Fehr & Peers Transportation Consultants
600 Wilshire Boulevard, Suite 1050
Los Angeles, CA 90017

Netai Basu, AICP, CTP
Catrina Meyer, Transportation Planner

Geotechnical Engineer

Geolabs – Westlake Village
31119 Via Colinas, Suite 502
Westlake Village, CA 91362

Lawrence Stark, G.E 2772
Ronald Z. Smerling, C.E.G 1047

6. References Acronyms and Abbreviations

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2. Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CIWMA	California Integrated Waste Management Act
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities

CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HVAC	Heating, Ventilation and Air Conditioning
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development

LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide

RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SoCalGas	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SMC	Santa Monica College
SMCCD	Santa Monica Community College District
SMMC	Santa Monica Municipal Code
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal

TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
U.S.EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter