FINAL ENVIRONMENTAL IMPACT REPORT

SANTA MONICA COLLEGE CAREER AND EDUCATIONAL FACILITIES MASTER PLAN (2010 UPDATE)

Prepared for:

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

SCH# 2009091093

SANTA MONICA COLLEGE

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I. INTRODUCTION/SUMMARY

CEQA REQUIREMENTS

Before approving a project, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (Final EIR). The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that:

The Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

The Lead Agency must provide each agency that commented on the Draft EIR with a copy of the Lead Agency's proposed response at least 10 days before certifying the Final EIR.

ORGANIZATION OF THE FINAL EIR

This document, together with the Draft EIR and the Draft EIR Technical Appendices constitute the Final EIR for the proposed SMC Career and Educational Facilities Master Plan (2010 Update) Project.

This Final EIR is organized in the following sections:

I. Introduction/Summary

II. Additions and Corrections to the Draft EIR

III. Responses to Comments on the Draft EIR

IV. Mitigation Monitoring Program

CEQA PROCESS

Notice of Preparation and EIR Scope

Comments on the scope of the Draft EIR were solicited through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a 30-day review period starting on September 24, 2009 and ending on October 26, 2009. Refer to Appendices A and B to the Draft EIR for a copy of the NOP and written comments submitted to SMC in response to the NOP. Based on a preliminary assessment of the Master Plan and the agency and public comments received in response to the NOP, the Lead Agency determined that the following environmental issue areas should be included within the scope of the EIR:

- Aesthetics (Views, Light and Glare)
- Air Quality/Global Climate Change
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise/Vibration
- Public Utilities (Water, Sewer, Energy Conservation, Solid Waste)
- Public Services (Police and Fire Protection)
- Transportation/Traffic/Parking
- Neighborhood Effects
- Geology/Soils
- Cumulative Impacts

Public Participation

To provide full public disclosure of potential environmental impacts that may occur as a result of a proposed project, CEQA requires the Draft EIR to be circulated during the public review period to all responsible agencies, trustee agencies, and the general public. Consistent with CEQA, the Draft EIR was circulated for a minimum 45-day review period (P.R.C. § 21091 (a)). During this review period, all public agencies and interested individuals and organizations had the opportunity to provide written comments raising their concerns, if any, with the adequacy and completeness of the Draft EIR.

The Draft EIR public review period began on April 21, 2010 and ended on June 4, 2010**.** The Draft EIR was available to the public via the College's official website at: http://www.smc.edu. Copies of the Draft EIR and all documents referenced in the Draft EIR were available for public review at SMC's Administrative Offices during normal business hours at 2714 Pico Boulevard, Room 320, Santa Monica, California 90405. See Section III, Responses to Comments on the Draft EIR, for a list of comments received and Lead Agency responses. In addition, refer to Appendix A to this Final EIR for the original comment letters submitted to the Lead Agency.

PROJECT DESCRIPTION SUMMARY

Interim Phase – 2010 Master Plan

The Interim Phase of the 2010 Master Plan involves the buildout of projects that are currently approved and under construction or that have been recently entitled and approved by the Board of Trustees under separate actions that preceded the development of the current draft master planning process. The Interim Phase would include buildout of the Bundy Campus,[1] the Liberal Arts Replacement Project,[2] the Information Technology Relocation Project to the Library Building,[3] the Student Services Replacement, Bookstore Modernization and Pico Promenade Improvements Project,[4] and the 1410 Pico Boulevard Parking Lot Improvement Project.[5] Because no further discretionary review of these projects is necessary, those projects are not re-examined in this EIR.

Proposed 2010 Master Plan

The primary objective of the Santa Monica College Career and Educational Facilities Master Plan (2010 Update) is to update the 1998 Santa Monica College [Educational Facilities] Master Plan (Amended 2002, 2004, and 2007) goals and policies with respect to planning, acquiring, modernizing, improving, developing, and maintaining property, facilities and equipment to provide the best possible educational environment and promote the incorporation of sustainable resources.

The purposes of the Proposed Project are to identify long-term planning goals for SMC facilities that will assist the District in preparing students for the jobs of the 21st century and competing in a global economy, including improving the teaching of math, science, and technology; to identify program improvements for specific projects; and to obtain necessary project-specific approvals.

The Proposed Project will involve renovation, new construction and demolition of facilities on the 41.5-acre Santa Monica College Main Campus at 1900 Pico Boulevard, the 3.5-acre Academy of

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1 *Bundy Campus Master Plan Final EIR (SCH # 2005091142), January 26, 2007.*

2 *Initial Study/Mitigated Negative Declaration for the SMC Liberal Arts Replacement Project, July 2, 2003.*

3 *Notice of Exemption, Information Technology Relocation, July 28, 2009.*

4 *Initial Study/Mitigated Negative Declaration for the Student Services Replacement, Bookstore Modernization and Pico Boulevard Improvements Project, February 2008.*

5 *Notice of Exemption, 1410 Pico Boulevard Parking Lot Improvements, June 4, 2008.*

Entertainment and Technology Campus at 1660 Stewart Street, the 2.4-acre Olympic Shuttle lot at the northeast corner of Stewart Street and Exposition Boulevard, and the 4.5-acre SMC Performing Arts Campus located at 1310 11th Street. All properties are located in the City of Santa Monica. No facility changes are proposed at Emeritus College, the Airport Arts Campus nor the Administration Building. No changes or amendments to the approved Bundy Campus Master Plan are proposed under the 2010 Update.

The Proposed Project provides for the orderly implementation of capital improvement projects as identified in Measure AA, a local bond measure approved by the voters of the District in November 2008; the final phase of a modernization program of new and renovated facilities on the Main Campus; the consolidation of related digital media programs in new and renovated facilities on the Academy of Entertainment and Technology Campus; the seismic repair and expansion of facilities at the Performing Arts Campus; related parking improvements; related circulation improvements; related landscaping and open space elements; general site improvements; and the long-range development planning for the Olympic Shuttle site.

In total, the Proposed Project would result in a total of approximately 1,409,151 gross square feet of development (or approximately 903,552 square feet of assignable square feet (ASF)) campus-wide, which is a net increase of 243,626 gross square feet (or approximately 161,990 square feet ASF) as compared to the existing environmental baseline conditions. The Proposed Project would involve the demolition of approximately 227,020 square feet of gross building area (or 144,877 square feet ASF). For a complete, detailed summary of the Proposed Project, refer to Section II, Project Description, of the Draft EIR.

AREAS OF CONCERN

Included in Appendix B to the Draft EIR, are written comment letters that have been submitted to Mr. Randal Lawson, Executive Vice-President of SMC during the NOP public review period. Environmental concerns that were raised within the comment letters include the following topics: air quality, hazardous materials/risk of upset, noise, traffic/parking, and public utilities.

In addition to these written comments, verbal comments were made at three public outreach meetings, including one formal scoping session. Verbal comments focused on the issues of neighborhood effects, including: dust and air quality during construction, construction noise and vibration, operational noise levels at intersections, pedestrian and bicycle circulation, the bus system and turnouts along Pico Boulevard fronting the Main Campus, risk of upset from demolition activities and debris, and cumulative impacts. Collectively these issues are addressed within the scope of the Draft EIR within the respective sections contained in Section IV, Environmental Impact Analysis, of the Draft EIR.

In response to the Draft EIR, a total of 17 comment letters were received, including one form letter signed by seven individuals. The SCAQMD provided a response letter requesting localized construction emissions be quantified using the AQMD's localized significance thresholds. The requested analysis has been provided in the Corrections and Additions Section to this Final EIR. In addition, various comment

letters have raised questions pertaining to the air quality and noise impacts associated with the planned demolition of Corsair Stadium. In particular, comments questioned whether Corsair Stadium should be demolished (as proposed in the Master Plan) or repaired to bring the stadium up to current seismic safety standards. This issue has been responded to in Section III, Responses to Comments, and the Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, has been included as Appendix D to this Final EIR. Other comment letters raised specific questions pertaining to bicycle routes, pedestrian safety, traffic, traffic related noise impacts, and the overall purpose and need of the Proposed Project. For a detailed account of all of the comments and written responses to those comments, see Section III of this Final EIR.

ISSUES TO BE RESOLVED

Issues to be resolved include identification of how to mitigate potentially significant environmental impacts related to the Proposed Project to a level of insignificance, identification of any potentially significant environmental impacts that cannot feasibly be mitigated to a level of insignificance, identification of the Environmentally Superior Project Alternative, and consideration of whether one of the alternatives should be approved rather than the Proposed Project.

ALTERNATIVES

Section 15126.6(c) of the State CEQA Guidelines requires that the Draft EIR include a reasonable range of project alternatives that could feasibly accomplish most of the basics objectives of the Proposed Project and could avoid or lessen one or more of the significant effects of the Proposed Project. The following Alternatives are analyzed in the Draft EIR:

- **No Project Alternative:** The No Project Alternative would be the result of not approving the Proposed Project. Under this scenario, the Interim Projects that are currently under construction or which have been previously planned for and approved by the Board of Trustees under separate actions that preceded the development of the current draft master planning process would be implemented. The Future Interim Projects would result in a total Campus-wide development of 1,165,525 GSF of floor area and 741,562 ASF of floor area. As compared to the current conditions, this reasonably foreseeable growth would result in a net increase of 89,123 GSF and 60,181 ASF.

- **Alternative 1: Olympic Shuttle Lot Land Swap Alternative.** This Alternative would consist of a project that is similar to the Proposed Master Plan 2010 Update with the exception of the future development envisioned for the Olympic Shuttle Lot. This Alternative addresses the potential land swap between the City of Santa Monica and SMC where the Olympic Shuttle Lot would be exchanged for a surface parking lot located at the southwest corner of Airport Avenue and Bundy Drive and adjacent to the SMC Bundy Campus. Under this scenario, SMC would utilize the Airport Shuttle Lot to accommodate surface parking for students, with direct access to the Big Blue Bus route at the Bundy Campus shuttle stop.

The future development at the Olympic Shuttle Lot under the City's ownership would no longer be associated with the SMC Master Plan and any future development at that location would be subject to a separate environmental review under CEQA. It should be noted that a potential development at that location has already been addressed within the Exposition Line Phase 2 Project EIR.

- **Alternative 2: Reduced Density Alternative:** The Reduced Density Alternative consists of a master plan buildout scenario that contains all of the same components and features as the Proposed Project, but with a 50% reduction to future development.

As required pursuant Section 15126.6 of the State CEQA Guidelines, the Draft EIR includes selection of an "environmentally superior" alternative from amongst the Project Alternatives analyzed and discussion of the reasons for such selection. The environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. Based on the Analysis contained in Section VI, Alternatives, of the Draft EIR, the environmentally superior alternative is Alternative 2, the Reduced Density Alternative.

Section VI, Alternatives to the Proposed Project, in the Draft EIR includes a detailed description of each of the above-listed Alternatives, including the logic in choosing the Alternative and an analysis of the potential environmental impacts of each Alternative as compared to the impacts of the Proposed Project.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table I-1 on the following pages summarizes the various environmental impacts associated with the construction and operation of the Proposed Project. Mitigation measures are proposed for significant environmental impacts, and the level of impact significance after mitigation is also identified. See also Section IV, Mitigation Monitoring Program, of this Final EIR which ensures that these mitigation measures are implemented.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
B. Aesthetics		
Views: No designated public viewsheds would be impacted by the Proposed Project. Apart from intermittent views of the Santa Monica Mountains to the north, there are no scenic vistas within the vicinity of any of the identified campuses under the Proposed Project. No scenic viewsheds would be obstructed by the implementation of the Proposed Project, and impacts would be less than significant **Visual Character:** The Master Plan is expected to improve the aesthetic character of the SMC Campus and Satellite Campuses' frontages by replacing views of outdated buildings, temporary modular buildings, and surface parking lots with views of new and updated buildings not out of scale with existing or surrounding development. As such, the Master Plan would positively contribute to the area's aesthetic value, and impacts related to visual and aesthetic qualities would be less than significant. **Lighting:** Sources of lighting under the Master Plan would include interior lighting, exterior security lighting, and headlights associated with motor vehicles on-site and passing on neighboring streets. Security lighting would be installed to provide a secure environment in and around the campuses. Continuing existing efforts to minimize excessive light spillover off-site, all new lighting fixtures under the Master Plan would be directed towards the interior of the Main Campus, AET Campus, Olympic Shuttle Lot, and PAC, and directed away from the neighboring land uses.	(B-1) A Campus Lighting Plan shall be developed to ensure that lighting provided throughout the SMC Campus system minimizes the extent of spillover onto adjacent properties. (B-2) All new structures shall be constructed of glare-reducing materials that minimize glare impacts on motorists and other persons on and offsite.	The Master Plan would result in a less-than-significant impact associated with aesthetics.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
Light impacts would therefore be substantially similar to the existing conditions, and in some instances further improved, and impacts would be less than significant. **Glare:** The Master Plan would not cause excessive glare that is out of character with the land uses surrounding the SMC Campuses, or result in a substantial increase in light or glare that would affect surrounding land uses. In addition, implementation of the mitigation measures would ensure that impacts related to glare would remain less than significant. Glare impacts would therefore be substantially similar to the existing conditions and impacts would be less than significant.		
C. Air Quality/Global Climate Change		
AQMP Consistency: The Proposed Project is a school project that is aimed at accommodating the existing and future educational needs in the project vicinity and it is not considered to be growth-inducing. Therefore, the Proposed Project would not impair implementation of the AQMP, and this impact would be less than significant. **Construction Impacts:** The peak daily emissions generated during project construction would not exceed the regional emissions threshold recommended by the SCAQMD for NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ during period of construction. However, ROG exceeds the SCAQMD significance threshold of 75 pounds per day between the years of 2013 and 2016. As such, without mitigation, the regional air	(C-1) The project applicant shall require, by contract specifications, that architectural coatings used at the Proposed Project contain no more than 100 grams of VOC per liter.	The Master Plan would result in a less-than-significant impact associated with air quality during construction and operation.

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Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
quality impacts associated with the project-related construction emissions would be potentially significant. **Operational Impacts:** The net operational emissions associated with the Proposed Project would not exceed the established SCAQMD threshold levels for ROG, NO_x, CO, SO_x PM_{10}, and $PM_{2.5}$ during both the summertime (smog season) and wintertime (non-smog season). Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant. **Localized CO Impacts:** Future 1-hour and 8-hour CO concentrations near the study intersections would not exceed their respective national or State ambient air quality standards (i.e., the national 1-hour CO ambient air quality standard is 35.0 ppm, and the State 1-hour CO ambient air quality standard is 20.0 ppm; the 8-hour national and State standards for localized CO concentrations are 9.0 ppm). Therefore, implementation of the Proposed Project and cumulative development would not expose any possible sensitive receptors located in close proximity to these intersections to substantial localized pollutant concentrations. This would be a less than significant impact regarding the exposure of sensitive receptors to substantial pollutant concentrations. **Toxic Air Contaminants:** As the Proposed Project would consist of the development of educational uses, and would not include any land uses involving		

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, no toxic airborne emissions would result from its implementation. **Greenhouse Gas Emissions/Global Climate Change:** The operational GHG emissions for the Proposed Project have been calculated and are estimated to result in a net increase of 8,700 CO_2e in metric tons per year. The consistency of the Proposed Project has been evaluated against the strategies from the 2006 CAT Report and the recommended measures in the ARB's Scoping Plan. As shown therein, the Proposed Project would be consistent with all feasible and applicable strategies to reduce GHG emissions in California. Therefore, the impact of the Proposed Project with respect to GHG emissions would be less than significant.		
D. Hazards and Hazardous Materials		
Construction Due to the age of the various structures that occur at each Project Site, asbestos-containing materials (ACMs) and lead-based paint (LBP) are presumed to be located within the older buildings (pre-1976) where renovation and demolition activities are proposed. However, the recommended mitigation measure D-1 regarding the requirement for abatement of asbestos containing materials and lead-based paint, if found to be present, would ensure that potential impacts related to the release of hazardous materials into the environment would be less than significant.	(D-1) Prior to the issuance of a demolition permit, a letter shall be obtained by the SMC Office of Facilities Planning from a qualified asbestos abatement and lead-based paint consultant stating that no ACMs or LBP are present in the structures. If ACMs or LBPs are found to be present, such materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable state and federal rules and regulations.	The Master Plan would result in a less-than-significant impact associated with hazards and hazardous materials with the implementation of the recommended mitigation measures.

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Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
In the event impacted soils are encountered during site preparation, grading, and excavations, all work would cease and the Division of the State Architect shall be contacted. Mitigation measure D-2 would require the Project Applicant to implement a Soil Management Plan (SMP), as required by the Division of the State Architect, to the satisfaction of the Regional Water Quality Control Board, which would ensure remediation of contaminated soils and groundwater, if encountered. **Operation** The operation of Proposed Project buildings and improvements would not expose students, faculty, staff, or other visitors to risks associated with ACM or LBP, which would be removed prior to construction. The operation of Proposed Project buildings and improvements would continue to require the use of hazardous materials in relatively small quantities for routine cleaning, maintenance, and landscaping. Such use would not require the routine transport, use, or disposal of substantial amounts of hazardous materials. With respect to the AET and Olympic Shuttle Lot, methane should be presumed to be located beneath the soil as the site is in the general vicinity of a closed former landfill. Constructing habitable structures without proper foundation design could result in the accumulation of methane below the building(s), which would have the potential to create a hazardous situation if not properly addressed with performance based methane mitigation investigations and mitigation measures to ensure a safe and secure environment. Therefore, there would be no substantial risks associated with accidental releases of hazardous materials and a less-than-significant impact would occur.	(D-2) If contaminated soils are encountered during Project construction, the District shall prepare and implement a Soil Management Plan (SMP), as required by the Division of the State Architect and in accordance with an approved Memorandum of Agreement between the Applicant and the RWQCB. (D-3) Prior to commencement of construction at either site, the soils beneath all proposed structures at the AET and Olympic Shuttle lot, respectively, shall be independently analyzed by a qualified engineer, who shall investigate and record detectable methane levels and recommend appropriate measures to prevent or retard potential methane gas seepage into the proposed buildings. If warranted, all commercial, industrial, and institutional buildings shall be constructed with an approved Methane Control System, with a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
E. Hydrology and Water Quality		
Construction Construction of the proposed project would involve site preparation activities such as grading and excavation. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the project would implement a SWPPP, which would specify BMPs and erosion control measures to be used during construction to prevent pollution. In addition, the project would be required to comply with State grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, with compliance of all NPDES General Construction Permit requirements including preparation of a SWPPP, implementation of BMPs, and compliance with all applicable grading regulations, the proposed project would not violate water quality standards. Construction-related impacts to hydrology and surface water quality would therefore be less than significant. **Operation** Buildout of the SMC campuses under the Proposed Project would result in a slight decrease in the total amount of impervious surface area contained within the four sites. As a result, there would be no loss of potential groundwater recharge as a result of the project	The Proposed Project would be required to comply with federal, state, and municipal regulations concerning stormwater quantity and quality, including relevant requirements under the NPDES permits for construction sites and municipal storm drain systems. No project specific mitigation measures are required.	The Master Plan would result in a less-than-significant impact with respect to hydrology and water quality.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
when compared to existing conditions at the Project Sites. In addition, the proposed project would not significantly contribute to the depletion of existing groundwater supplies as it would be supplied from the City's existing municipal water sources, as is the case with existing development on the SMC campuses. Furthermore, all storm drain runoff collected at each individual site must be treated by means of BMPs as prescribed by the SUSMP requirements. The final selection of BMPs would be completed through coordination with the DSA. With compliance of the SUSMP requirements, operational project impacts associated with water quality would be less than significant. **Flooding & Other Hazards** FEMA has identified that the City of Santa Monica is located in a zone with minimal risk from flooding (Zone C). In addition, potential for tsunami inundation would be remote. None of the identified campuses are positioned down slope from an area of potential mudflow, and no impact would occur with respect to mudflows. In light of the lack of significant bodies of water adjacent to the site, the potential for a seiche to impact the sites is considered low. The Geotechnical Investigation for the Proposed Parking Structure, AET Building, and KCRW Building found that the AET Campus and Olympic Shuttle lot are located outside of the designated inundation hazard area and are thus not susceptible to flooding. Accordingly, the Proposed Project would result in less than significant impacts with respect to flooding and associated hazards.		

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
F. Land Use and Planning		
Land Use Plan/Zoning Consistency The Proposed Project would not be considered growth-inducing. Accordingly, the Proposed Project would not interfere with any of the goals or policies identified in SCAG's regional planning documents and this impact would be less than significant. The Proposed Project would be generally consistent with all of the applicable objectives and policies of the City of Santa Monica Land Use and Circulation Element (LUCE). The Proposed Project would exceed the height limitations for the applicable zoning designations for the Main Campus, the Performing Arts Campus, the AET Campus, and the Olympic Shuttle lot. However, as discussed in the relevant EIR chapters, these technical inconsistencies would not result in adverse physical changes to the environment. Furthermore, the technical zoning inconsistencies would be resolved through SMC's utilization of Section 53094 of the California Government Code, which provides that school districts may override the local zoning regulations. As such, impacts would be considered less than significant.	No mitigation measures are required.	The Proposed Project would have less than significant impacts with respect to Land Use and Planning.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
G. Noise/Vibration		
Construction Noise Maximum construction-related noise levels would not result in increases above 40 dBA indicated for Noise Zone I or III (totaling 100 and 110 dBA, respectively) as stated under the City of Santa Monica Municipal Code. However, the Proposed Project would increase the equivalent noise level by more than 20 dBA, totaling 80 dBA during construction activities located at in Noise Zone I (the Main Campus, Olympic Shuttle Lot, and Performing Arts Campus). Nevertheless, as provided in SMMC Section 4.12.110 (d), any construction activities that exceed the noise levels established in subsection (1) shall occur between the hours of ten a.m. and three p.m. As such, it is anticipated that construction-related noise impacts at adjacent sensitive receptors would be less than significant. And, mitigation measures are provided to ensure that potential construction-related noise impacts would remain less than significant. **Construction-Related Groundborne Vibration** The Proposed Project would be consistent with the Santa Monica Municipal Code regarding vibration, and the Proposed Project's inclusion of noise mitigation measures will also reduce potential vibration impacts. Therefore, impacts would be considered less than significant.	**Construction:** (G-1) Pursuant to Section 4.12.110 of the 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. (G-2) Pursuant to Section 4.12.110 (d), any construction activities that exceed an 80 dBA equivalent noise level shall occur between the hours of ten a.m. and three p.m., Monday through Friday. (G-3) Prior to construction, the contractor shall submit a list of equipment and activities required during construction to the SMC Office of Facilities Planning. (G-4) All construction equipment shall be in proper operating condition and fitted with standard factory noise attenuation features. (G-5) Sound blankets shall be used on all construction equipment where technically feasible. (G-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. (G-7) Stockpiling and vehicle staging areas shall be located away from occupied dwellings and other sensitive receptors to the extent feasible	With the implementation of the Mitigation Measures G-1 through G-8, noise and vibration impacts associated with the Master Plan would be considered less than significant.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
Operational Noise ***Traffic Noise*** Project traffic would not increase the ambient noise level at any intersection by more than 3 dBA. In fact, the largest noise increase of 1.6 dBA at Pennsylvania Avenue is considered to be barely perceptible to the human ear. Therefore, project impacts associated with a permanent increase in ambient noise levels to the surrounding noise environment from mobile noise sources would be less than significant. ***On-Site Noise*** The Proposed project would include new and renovated structures at the Main Campus, AET Campus, Olympic Shuttle Lot Campus and Performing Arts Campus. It is expected that each use would include rooftop mechanical equipment and heating, ventilation, and air conditioning (HVAC) units and exhaust fans in order to provide cooling and ventilation within the structures. Mitigation Measure G-8 would ensure potential noise impacts from such equipment would be less than significant. ***Parking Noise*** Implementation of the Master Plan would call for a total net increase of approximately 195 spaces at the AET Campus, 419 spaces at the Olympic Shuttle Lot Campus, and 365 spaces at the Performing Arts Campus. The existing parking spaces at the AET, Olympic Shuttle Lot and Performing Arts Campuses are all provided in surface parking lots. Under the Proposed Project, all of these existing surface parking spaces would be removed and would be provided in subterranean and/or structured parking.	**Operation** (G-8) Mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot unless it can be shown that the noise will comply with the requirements of Section 4.12.060. Roof locations may be used when the mechanical equipment is installed within a noise attenuating structure.	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
Because the parking spaces would be located underground and in screened parking structures, noise levels generated by vehicles parking in the structures would not result in a substantial increase in noise levels when compared to existing noise levels. Thus, noise impacts associated with parking at these locations would be less than significant.		
H. Utilities		
Wastewater The Proposed Project would result in an approximate net increase of 19,491 gpd of wastewater generation. With respect to wastewater treatment facilities, the HTP has approximately 450 mgd of daily flow capacity and averages approximately 362 mgd. Thus, remaining daily flow capacity would be approximately 88 mgd which would accommodate the increased flow of approximately 19,491 gpd (0.02 mgd) that would be generated under the Master Plan. Further, local wastewater service would continue to be provided by the Water Resources Division from the existing wastewater infrastructure on and surrounding the SMC Campuses and this impact is expected to be less than significant. However, to ensure impacts would be less than significant, the Project Applicant would coordinate with the Water Resources Division of the City of Santa Monica demonstrating wastewater systems would not require an upgrade of the serving utilities at the time of construction.	**Wastewater** No mitigation measures are required. However, the SMC Facilities Master Plan will incorporate a variety of project design features intended to minimize the SMC Campus' use of water resources, and thus reduce the campus' wastewater generation, at Master Plan buildout.	**Wastewater** The Proposed Project would have a less than significant impact with respect to wastewater.

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Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
Water The Proposed Project would result in an approximate net increase of 23,387 gpd of water demand. While the Master Plan would increase water consumption on the SMC Campuses (21% increase compared to existing conditions), development under the Master Plan would be subject to all applicable water conservation regulations identified in Section 7.16.020 of the Santa Monica Municipal Code which identifies applicable water conservation requirements. In addition, the Water Resources Division has stated that it is ready to serve all development within the City of Santa Monica corporate boundaries. Water service to the SMC Campuses would continue to be provided by Water Resources Division from the existing water infrastructure on and surrounding the SMC Campuses and this impact would be less than significant.	**Water** No mitigation measures are required. However, the SMC Facilities Master Plan will incorporate a variety of project design features intended to minimize the SMC Campus' use of water resources.	**Water** The Master Plan would have a less-than-significant impact with respect to water.
Energy The Proposed Project would result in an approximate net increase of 2,813,880 kilowatt hours per year of electricity demand. The Proposed Project would result in an approximate net increase of 487,252 cf/month of natural gas demand. The Proposed Project's increase in electricity demand has been accommodated within the context of regional energy supply planning and impacts related to regional electricity supply would be less than significant. While the Master Plan would slightly increase the demand on the regional natural gas supply, the SMC Campuses would not be expected to reduce the SCG's ability to supply natural gas to other customers. As such, impacts related to regional natural gas supply and infrastructure would be less than significant.	**Energy** No mitigation measures are required.	**Energy** The Master Plan would have a less-than-significant impact with respect to energy resources. **Solid Waste** The Master Plan would

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Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
Solid Waste The Proposed Project would result in an approximate net increase of 1,705 pounds per day of solid waste. These estimates however, present a worse case conservative estimate as the generation rates do not account for recycling efforts, which are already in place on all campuses and will continue to be implemented. It should also be noted that the amount of solid waste generated by the Proposed Project is negligible on a regional scale, and would be further reduced with continued implementation of the SMC recycling programs. Furthermore, the Proposed Project would be required to adhere to all applicable federal, State, and local statues and regulations related to solid waste, and impacts would be considered less than significant.	**Solid Waste** No mitigation measures are required.	have a less-than-significant impact with respect to solid waste.
I. Public Services		
Police The demand for police services would be expected to increase to some degree with the increase in activity across the Main Campus, AET Campus, Olympic Shuttle Lot and PAC Campus, some of which would be accommodated within an on-site subterranean parking garage. The SMC campuses would continue to be served by SMCPD security personnel which would patrol the proposed buildings and parking areas on a regular basis. Overall, SMCPD's ability to further service and accommodate the growth as a result of the Master Plan would not be expected to require substantial additional equipment, station space, or staff. As such, the Proposed Project would have a less-than-significant impact associated with SMCPD police services.	**Police** No mitigation measures are required. However, the Proposed Project will incorporate a variety of project design features intended to minimize the SMC Campus' need for police services. Specifically, SMC and SMCPD will prepare and implement a security plan addressing policies for crime prevention	**Police** The Master Plan would have a less-than-significant impact associated with police services.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
Fire Demand for fire protection services at the SMC Campuses would be expected to slightly increase in conjunction with the increase in occupied floor area and student activity on the SMC Campuses. However, the Proposed Project would upgrade some existing structures and introduce new state of the art facilities which would result in an improvement to fire suppression and safety as compared to existing conditions. Implementation of the Proposed Project would, therefore, not be expected to generate new or altered fire protection services from the City of Santa Monica Fire Department. As such, no significant impacts to fire protection services are expected. However, the mitigation measure provided is recommended to ensure that impacts would remain less than significant.	**Fire** (I-1) The following fire safety measures shall be incorporated into the building plans and shall be submitted to the Fire Department for approval prior to the approval by the Division of the State Architect. The plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant	**Fire** The Master Plan would have a less-than-significant impact associated with fire protection.
J. Transportation/Traffic/Parking		
Intersection Traffic (City of Santa Monica) Application of the City of Santa Monica's significant impact threshold criteria in the "Year 2017 Plus Project Traffic Conditions" scenario indicates that the Project is expected to create potentially significant impacts at 29 of the 117 City of Santa Monica study intersections during weekday conditions. Application of the City of Santa Monica's significant impact threshold criteria in the "Year 2017 Plus Project Traffic Conditions" scenario indicates that the Project is expected to create potentially significant impacts at four of the City of Santa Monica study intersections located in the vicinity of the PAC Campus	**TDM Programming Measures** (J-1) *Transportation Demand Management Association*. As part of the LUCE Update process, the City of Santa Monica has identified that a Transportation Demand Management Association (TMA) should be established for the SMC Main Campus. Santa Monica College shall participate in the establishment of a geographic-based TMA for its Main Campus by providing information and sending representatives to the TMA meetings if such a TMA is organized by the City of Santa Monica. If and when formed, the TMA is expected to provide faculty/staff, students, and visitors with resources to increase the amount of trips taken by transit, walking, bicycling, and ridesharing. This mitigation measure does not commit SMC to funding such resources.	With the implementation of mitigation measures listed, it is likely that some locations would still experience traffic increases due to the Project that would cause traffic impacts to be deemed significant. Nevertheless, the implementation of the mitigation measures is

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
during the weekend conditions. **Intersection Traffic (City of Los Angeles)** Application of the City of Los Angeles' significant impact threshold criteria in the "Year 2017 Plus Project Traffic Conditions" scenario indicates that the Project is expected to create potentially significant impacts at ten of the 23 City of Los Angeles study intersections during weekday AM and/or PM peak hour conditions. It should be noted that three of the ten study intersections (Nos. 112, 113 and 114) forecast to be significantly impacted based on the City of Los Angeles methodology also are forecast to be significantly impacted based on the City of Santa Monica methodology. **Congestion Management Program** The maximum increase in the freeway mainline traffic during the AM peak hour due to the Project is estimated to be 124 vehicles on a portion of the I-10 (Santa Monica) Freeway. During the PM peak hour time period, the maximum increase in the freeway mainline traffic is estimated to be 60 vehicles on a portion of the I-10 Freeway. Similarly, the maximum increase in the freeway mainline traffic during the AM peak hour due to the Project is estimated to be 77 vehicles on a portion of the I-405 (San Diego) Freeway. During the PM peak hour, the maximum increase in the freeway mainline traffic is estimated to be 37 vehicles on a portion of the I-405 Freeway. These increases in overall mainline freeway traffic volumes correspond to a D/C increase of 0.016, or less than two percent of the total capacity of the segments included in the analysis. Increases of this magnitude are likely not to be	(J-2) *Employee Transportation Coordinator*. An Employee Transportation Coordinator (ETC) shall be designated for SMC. The ETC shall manage all aspects of this TDM program and participate in City-sponsored workshops and information roundtables. While the Project encompasses multiple sites, the ETC shall be responsible for TDM activities at all campuses. (J-3) *Performance Monitoring and Targets*. SMC shall seek to ensure that cumulative vehicular trip generation for the Proposed Project does not exceed current levels at the Main Campus, AET Campus, Olympic Shuttle Lot Campus, and PAC Campus. Consistent with the objectives of the City's Draft LUCE, trip generation shall be monitored during the weekday PM peak hour. SMC shall contract with a licensed traffic engineer to monitor compliance with the PM peak hour trip reduction target. A baseline PM peak hour trip generation target shall be established following completion and occupancy of the new Student Services Building by counting traffic at the driveways serving the Main Campus, AET Campus, Olympic Shuttle Lot Campus and PAC Campus. The baseline target shall be determined by summing the trip generation counted at each campus during one common hour (e.g., 5:00 – 6:00 PM). Thereafter, once every two years, beginning in the first full school year following the occupancy of the first building greater than 20,000 ASF constructed under this Master Plan, the traffic engineer shall conduct weekday PM peak hour monitoring counts at the SMC campus driveways and prepare a report on compliance for SMC's Board of Trustees. The traffic monitoring should generally be conducted on a mid-weekday (Tuesday, Wednesday or Thursday) in the middle of the Fall semester (e.g., October) corresponding with the methodology used in establishing the baseline. In the event that the target is not reached in a two year period, SMC shall make modifications to the TDM conditions to more	recommended to eliminate the significant traffic impacts at some locations and reduce the level of severity of the significant traffic impacts at other locations.

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Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
discernible to typical motorists. Thus, no significant Project-related mainline freeway impacts are anticipated along the I-10 and I-405 Freeways. Thus, no significant Project-related mainline freeway impacts are anticipated along the I-10 and I-405 Freeways. The Project will not add 150 or more trips (in either direction), during either the AM or PM weekday peak hours to the CMP freeway monitoring locations, which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required **Public Transit** The additional public transit trips generated by the Project would cause a potentially significant impact to public transit services, prior to consideration of potential mitigation measures. Implementation of the mitigation measures would ensure that impacts would be less than significant. **Parking** Future parking supply is expected to adequately accommodate the additional parking demand generated by the Proposed Project at each of the identified campuses.	effectively achieve, through reasonable and feasible measures that will not substantially increase the cost of mitigation, the performance target herein. Should the PM peak hour trip generation target be reached in two successive reporting periods (i.e., over four years total), no additional monitoring shall be required. In no event shall the monitoring conclude prior to year 2017 (the anticipated build-out of the Master Plan). (J-4) *Transportation Information Centers.* SMC shall provide on-site information at its Main Campus for employees, students, and visitors about local public transit services (including bus lines, future light rail lines, bus fare programs, rideshare programs and shuttles) and bicycle facilities (including routes, rental and sales locations, on-site bicycle racks and showers [at the Main Campus only in the Physical Education building]). SMC shall also provide walking and biking maps for employees, visitors and residents, which shall include but not be limited to information about convenient local services and restaurants within walking distance of the SMC campuses. SMC shall provide information to students and employees of the campuses regarding local rental housing agencies. Such transportation information may be provided through a computer terminal with access to the Internet, as well as through the office of the ETC located at the SMC Main Campus. Transportation information may also be maintained at the administrative offices of the SMC satellite campuses, or by directing inquiries to the Main Campus or SMC web site. (J-5) *TDM Web Site Information.* SMC shall be required to provide transportation information in a highly visible and accessible location on the school's web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, students and	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
	visitors of available alternative transportation modes to access the campuses and travel in the area. The web site should highlight the environmental benefits of utilization of alternative transportation modes. (J-6) *TDM Promotional Material*. SMC shall be required to provide and exhibit in public places information materials on options for alternative transportation modes and opportunities. In addition, transit fare media and day/month passes will be made available to employees, students and visitors during typical business hours. (J-7) *Transit Welcome Package*. SMC shall provide all new students and employees of the college with a Transit Welcome Package (TWP). The TWP at a minimum will include information regarding SMC's arrangement for free or discounted use of the Big Blue Bus, area bus/rail transit route information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the SMC campuses. (J-8) *Expanded SMC Inter-Campus Shuttle*. The existing SMC inter-campus shuttle shall be expanded to connect all SMC campuses, including the subject Main Campus, AET Campus, Olympic Shuttle Lot and PAC Campus. Additionally, the SMC Shuttle System route alignments and schedules shall be expanded in the future to connect with planned Metro Exposition Corridor Transit Project Phase 2 stations located within the City of Santa Monica (i.e., 26th Street/Olympic Boulevard Station, 17th Street/Colorado Boulevard Station and 4th Street/Colorado Boulevard Station). Such shuttle services can be provided by vehicles operated by SMC, or through agreement with a public transit agency such as the Santa Monica	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
	BBB. Such expanded shuttle service shall be free or discounted to students and employees of SMC. (J-9) *Internet-Based/Independent Study Education*. SMC shall continue to expand its offering of internet-based and independent study classes which allows for a portion or all of the education activities to occur without students and faculty needing to be physically on-site at an SMC facility. (J-10) *Public Transit Passes*. To the extent feasible, SMC will continue to offer free public transit coordination with the Santa Monica BBB for all students and staff. To the extent feasible, SMC will seek to expand this benefit to other transit providers (i.e., Metro). Should the program whereby students and staff are able to use their SMC identification card for free transit be discontinued or unavailable, SMC will work with the transit agencies to make available the purchase of a transit pass at a highly discounted rate (e.g., 50 percent). (J-11) *Employee Pay for Parking Program*. SMC shall continue to require that employees pay for their own parking. (J-12) *Carpool Program for Employees*. SMC shall provide preferential parking within the parking garage for SMC employees who commute to work in employer registered carpools. An employee who drives to work with at least one other employee to the SMC campuses may register as a carpool entitled to preferential parking within the meaning of this provision. (J-13) *Public Transit Stop Enhancements.* Working in cooperation with other transit agencies and the City of Santa Monica, SMC shall seek to improve existing bus stops with shelters and transit information within	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
	the immediate vicinity of the SMC campuses. Enhancements could include weather protection, lighting, benches, telephones, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative. This mitigation measure does not commit SMC to fund any particular improvements. (J-14) *Convenient Parking for Bicycle Riders*. SMC shall provide locations at all four campuses for convenient parking for bicycle commuters for employees working at the sites, students attending classes at the sites, and visitors to the sites. The bicycle parking will be located within the SMC campuses and/or in the public right-of-way adjacent to the commercial uses such that long-term and short-term parkers can be accommodated. For purposes of this requirement, bicycle parking may mean bicycle racks, a locked cage, or other similar parking area. SMC shall observe utilization of the bicycle parking at the Main Campus and satellite campuses each semester and, if necessary, make arrangements for additional bicycle parking if the demand for bicycle parking spaces exceeds the supply. (J-15) *Compressed Work Week Schedule*. When feasible, a Compressed Work Week schedule shall be offered to employees whereby their hours of employment may be scheduled in a manner which reduces trips to/from the worksite during peak hours for the surrounding streets. (J-16) *Flex-Time Schedule*. When feasible, SMC shall permit its employees within the Project to adjust their work hours in order to accommodate public transit schedules, rideshare arrangements, or off-peak hour commuting. (J-17) *Guaranteed Return Trip for Employees*. SMC shall provide vanpool	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
	and carpool reliant employees with a free return trip (or to the point of commute origin), when a personal emergency situation requires it. (J-18) *Student Parking Pricing*. SMC shall continue to require that students pay for their own parking. (J-19) *Student Hiring Policies*. To the extent feasible, SMC shall provide preferential consideration to hiring current SMC students for part-time employment based on satisfaction of other requirements of the available positions. (J-20) *Local Hiring Program*. To the extent feasible, when hiring SMC shall conduct outreach to residents who live within one mile of the SMC campus (or other facility to where the position of employment is offered), based on satisfaction of other requirements of the available positions. (J-21) *Expanded Bicycle Routes*. SMC shall coordinate with the City of Santa Monica in an effort to enhance and expand the current network of bicycle routes serving the SMC campuses. **CMP Transit Impact Mitigation** (J-22) To the extent feasible, SMC shall continue its program with the Santa Monica Big Blue Bus to provide free public transit services to all SMC students and staff. If this is not feasible or practical, SMC shall work with Santa Monica Big Blue Bus to offer reduced rate transportation to SMC students and staff. (J-23) To the extent feasible, SMC shall work with other public transit providers (e.g., Metro) to offer free public transit services to all SMC	

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
	students and staff. If this is not feasible or practical, SMC shall work with the public transit providers to offer reduced rate transportation to SMC students and staff. (J-24) SMC shall seek to expand shuttle connections (either through SMC-operated vehicles and/or in coordination with the Santa Monica Big Blue Bus) between campuses, including future connections to the Expo Light Rail Line stations in Santa Monica. (J-25) SMC shall work with the City of Santa Monica, Santa Monica Big Blue Bus and Metro to enhance the Pico Boulevard transit plaza including providing expanded sidewalk areas, shelters, lighting, and other passenger enhancement and safety features for both eastbound and westbound transit vehicles.	
K. Neighborhood Effects		
For purposes of identifying and disclosing potential adverse impacts upon neighborhoods adjacent to and within close proximity to the SMC campuses that will undergo physical improvements under the proposed Facilities Master Plan (2010 Update), please refer to each respective issue area already summarized herein: aesthetics/views, air quality emissions, hazardous materials/risk of upset, land use and planning, noise, and traffic/parking. Potential environmental effects associated with global climate change, hydrology and surface water quality, public utilities, public services, and geology/soils are regional in nature and do not generate localized impacts upon a specific neighborhood.	Where mitigation measures have been identified to reduce the Master Plan's potentially significant environmental impacts, they are identified by reference in the summaries herein and presented in detail in each respective section of the Draft EIR.	Please refer to each respective section of the Draft EIR.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
L. Geology/Soils		
Seismic Hazards The Proposed Project would be constructed in accordance with the City and State Building Codes and would adhere to all modern earthquake standards, including those relating to soil characteristics. Construction of the Proposed Project would also comply with the requirements of the Division of the State Architect, which would assure safe construction, including building foundation requirements appropriate to site conditions. Mitigation Measure L-1, below, would also ensure the Proposed Project would be constructed in accordance with the final geotechnical recommendations for each campus. Therefore, with implementation of the site development recommendations, development of the Proposed Project would not expose people to significant seismic-related ground failure, including liquefaction, and these impacts would be considered less than significant. **Soil Stability** Review of the available literature indicates that the project sites have not been subject to historical subsidence. Expansion test results indicate materials are generally in the middle to low portion of the low-expansion range. Excavation would be required for the subterranean structures of the Proposed Project. In addition, local excavation and earthwork would be conducted to provide footings, foundations, and subterranean walls to support the proposed parking structures and buildings. While considered remote, it is possible that some of the excavation work associated with the Proposed Project could encounter groundwater. If groundwater is encountered during construction, a dewatering system should be	(L-1) The Proposed Project shall be designed and constructed in accordance with the recommendations provided in the Project's Final Geotechnical Report for each Project Site, which shall be reviewed by the Division of the State Architect prior to construction.	With the implementation of Mitigation Measure L-1, impacts related to geology and soils would be less than significant.

Table I-1

Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measure	Level of Significance After Mitigation
installed prior to the subterranean area being excavated below the groundwater level. The dewatering system would be designed in accordance with the geotechnical recommendations for the site-specific conditions as they are encountered in a manner to reduce the potential for subsidence from dewatering activities. Proper construction would be further assured through the compliance with the Division of the State Architect, which includes building foundation requirements appropriate to site conditions. Mitigation Measure L-1, below, would ensure the Proposed Project would be constructed in accordance with the final geotechnical recommendations for each campus.		
Source: Christopher A. Joseph & Associates, July 2010.		

II. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

DRAFT EIR

I. INTRODUCTION/SUMMARY

The Introduction/Summary Section of the Draft EIR has been reprinted in its entirety in this Final EIR, as amended with the additions and corrections noted below.

II. PROJECT DESCRIPTION

No additions or corrections to this Section of the Draft EIR were required.

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

No additions or corrections to this Section of the Draft EIR were required.

IV. ENVIRONMENTAL IMPACT ANALYSIS

A. Impacts Found to be Less Than Significant

No additions or corrections to this Section of the Draft EIR were required.

B. Aesthetics

No additions or corrections to this Section of the Draft EIR were required.

C. Air Quality

Pages IV.C-21, Under the subheading *"Construction Emissions"* continued from the prior page add the following subsection:

Localized Construction Emissions

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount 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,[1] 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 $PM_{2.5}$. As

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

the construction activity at the Main Campus includes multiple source locations in areas that total more than five acres, site-specific air dispersion modeling was conducted using AERMOD Version 6.5.0.

Page IV.C-26: Under the subheading *"Construction Emissions"* continued from the prior page add the following subsection:

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and 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.

In conducting the analysis, the parameters of the sample construction scenarios provided by the SCAQMD were slightly modified such that they would apply to the project-specific characteristics of the Proposed Project. The resulting construction emissions generated were then analyzed against the applicable LSTs for each construction site. As shown in Tables II-1 through II-4, below, the peak daily construction emissions generated by the Proposed Project would not exceed the applicable LSTs for SRA 2 and therefore would not adversely impact any identified adjacent sensitive receptors. Please also refer to Appendix B of this Final EIR for the localized air quality calculation sheets. Localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table II-1
Localized Estimated Peak Daily Construction Emissions – AET

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x[a]	CO	PM_{10}	$PM_{2.5}$
Grading/Excavation (2011)	***61.9***	***28.6***	***5.7***	***3.4***
SCAQMD Localized Thresholds[b]	198	1430	12	6
Significant Impact?	No	No	No	No
Building (2011)	***25.1***	***11.9***	***1.4***	***1.3***
SCAQMD Localized Thresholds[b]	198	1430	12	6
Significant Impact?	No	No	No	No
Building/Paving (2014)	***45.5***	***25.0***	***2.5***	***2.3***
SCAQMD Localized Thresholds[b]	198	1430	12	6
Significant Impact?	No	No	No	No

[a] The localized thresholds listed for NO_x in this table adjusts for the more stringent federal 1-hour NO_2 of 0.10 ppm.
[b] The localized thresholds for construction emissions at a receptor distance of 82 feet for a 4.65-acre site in SRA 2 were calculated based on the linear regression methodology recommended by the SCAQMD.

Table II-2
Localized Estimated Peak Daily Construction Emissions - PAC

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x[a]	CO	PM_{10}	$PM_{2.5}$
Demolition (2012)	***14.4***	***9.2***	***1.0***	***0.9***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Excavation (2012)	***27.8***	***13.1***	***3.8***	***1.8***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Grading (2012)	***28.4***	***14.1***	***1.5***	***1.3***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Building (2012)	***21.7***	***10.7***	***1.2***	***1.1***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Building/Paving (2013)	***42.5***	***24.4***	***2.6***	***2.4***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No

[a] The localized thresholds listed for NO_x in this table adjusts for the more stringent federal 1-hour NO_2 of 0.10 ppm.

[b] The localized thresholds for construction emissions at a receptor distance of 82 feet for a 1.72-acre site in SRA 2 were calculated based on the linear regression methodology recommended by the SCAQMD.

Table II-3
Estimated Maximum Daily Pollutant Concentrations
from Main Campus Construction at Off-Site Receptors

Timeframe	Pollutant Concentrations[a]						
	1-Hour NO_2 (ppm)	Annual NO_2 (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)	24-Hour $PM_{2.5}$ ($\mu g/m^3$)
Q3 2012	0.072	0.023	3.10	2.02	0.84	0.07	0.76
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q4 2012	0.072	0.023	3.10	2.02	0.84	0.07	0.76
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q1 2013 – Q4 2013	0.70	0.022	3.09	2.02	0.81	0.064	0.74
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q1 2014	0.073	0.024	3.17	2.05	1.98	0.33	1.78
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q2 2014	0.078	0.026	3.26	2.09	3.23	0.62	3.00
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q3 2014	0.088	0.029	3.43	2.12	4.53	0.71	4.05
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q4 2014 – Q2 2015	0.073	0.024	3.2	2.07	2.47	0.53	2.26
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q3 2015	0.077	0.024	3.34	2.12	4.16	0.75	3.78
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q4 2015	0.08	0.026	3.43	2.14	5.01	0.93	4.60
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q1 2016 – Q2 2016	0.075	0.023	3.33	2.11	3.11	0.52	2.86
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q3 2016	0.091	0.028	3.96	2.29	9.33	0.94	8.43
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No

[a] *Maximum concentrations were estimated using unit emission factors (all emission rates set to 1.0 g/s) in the AERMOD modeling program and then multiplied by the emission rates during post-processing. This allows the modeler to estimate concentrations for multiple pollutants, multiple sources and construction phases. However this approach overestimates concentrations from multiple sources since the point of maximum impact is likely different for each emission source since in the unit emission factor approach, the maximums are summed regardless of location). Therefore, for the PM10 concentrations for Q3 2016, an additional modeling run was conducted using the actual emission rates for each source (see Table 4).*

Table II-4
Estimated Maximum Daily Pollutant Concentrations from Main Campus Construction During Q3 2016 at Off-Site Receptors Using Refined Air Dispersion Modeling for Construction

	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)
Air Concentration	6.2	0.94
SCAQMD Thresholds	10.4	1
Significant Impact?	No	No

To determine whether operational emissions generated by the Proposed Project would result in localized air quality impacts, the net operational emissions associated with the development at the Performing Arts Campus will be evaluated and utilized as a screening tool for the other campuses. As discussed in Section II, Project Description of the Draft EIR, the Proposed Project includes net increases of gross square footage as follows for each campus: 11,296 GSF at the Main Campus, 63,608 GSF at the AET Campus, 75,000 GSF at the Olympic Shuttle Lot and 93,722 GSF at the PAC. As such, the PAC includes the largest increase in operational GSF and would have the greatest potential for an operational LST exceedance. Therefore, if the net increase associated with the PAC development would not exceed the applicable LST, it is reasonable to assume the other campuses would also not exceed the applicable LSTs.

For operational emissions, the LST methodology is only applicable to the on-site emission sources at a Project Site. Consequently, this analysis only evaluates the emissions generated by the on-site stationary sources (e.g., water and space heaters, landscaping equipment, etc.) and mobile sources (i.e., vehicular travel within the sites) associated with the Proposed Project at the PAC.

Table II-5, Localized Estimated Daily Operational Emissions, analyzes the net daily operational emissions generated by the on-site stationary and mobile sources associated with the proposed development at the PAC against the SCAQMD's localized operational emission thresholds.[2]

[2] *The daily operational emissions generated by the stationary sources associated with the PAC are taken from the emission sources (with the exception of the mobile sources) that have been generated by the URBEMIS computer model. The daily operational emissions generated by the mobile sources onsite at the PAC are generated by a URBEMIS run where a travel distance of 0.1 mile is inputted to account for vehicular travel within the PAC site. See Appendix B to this Final EIR for URBEMIS sheets.*

Table II-5
Estimated Localized Air Quality Impacts at PAC– Operation

Operational Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions				
Future Net With Project Emissions				
Natural Gas Usage	0.91	0.76	0.00	0.00
Landscape Maintenance Equipment	0.02	1.55	0.01	0.01
Mobile (Vehicle) Sources	1.55	14.45	0.42	0.11
Total Emissions	***2.48***	***16.76***	***0.43***	***0.12***
SCAQMD Localized Thresholds	103	562	1	1
Significant Impact?	No	No	No	No
Wintertime (Non-Smog Season) Emissions				
Future Net With Project Emissions				
Natural Gas Usage	0.91	0.76	0.00	0.00
Mobile (Vehicle) Sources	1.78	19.21	0.42	0.11
Total Emissions	***2.69***	***19.97***	***0.42***	***0.11***
SCAQMD Localized Thresholds	103	562	1	1
Significant Impact?	No	No	No	No

As shown in Table II-5, above, on-site operational emissions generated by the PAC would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. Thus, the localized air quality impacts resulting from net operational emissions associated with the Proposed Project at the Main Campus, AET Campus, and Olympic Shuttle Lot would also be less than significant. No further response is required.

D. Hazards and Hazardous Materials

No additions or corrections to this Section of the Draft EIR were required.

E. Hydrology and Water Quality

No additions or corrections to this Section of the Draft EIR were required.

F. Land Use and Zoning

No additions or corrections to this Section of the Draft EIR were required.

G. Noise/Vibration

No additions or corrections to this Section of the Draft EIR were required.

H. Public Utilities

No additions or corrections to this Section of the Draft EIR were required.

I. Public Services

No additions or corrections to this Section of the Draft EIR were required.

J. Traffic/Transportation/Parking

No additions or corrections to this Section of the Draft EIR were required.

K. Neighborhood Effects

No additions or corrections to this Section of the Draft EIR were required.

L. Geology/Soils

The Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, has been added to the environmental record as Appendix C to this Final EIR. This Seismic Evaluation Study provides additional documentation and support with regard to the technical evaluation of the current stadium and SMC's decision to demolish the Corsair Stadium and rebuild a new stadium in accordance with modern seismic safety practices. The inclusion of this study in the Final EIR does not alter the environmental findings and analysis contained within the Draft EIR with respect to Geology and Soils.

V. GENERAL IMPACT CATEGORIES

No additions or corrections to this Section of the Draft EIR were required.

VI. PROJET ALTERNATIVES

No additions or corrections to this Section of the Draft EIR were required.

VII. PREPARERS OF THE EIR AND PERSONS CONSULTED

No additions or corrections to this Section of the Draft EIR were required.

VIII. REFERENCES AND ACRONYMS

No additions or corrections to this Section of the Draft EIR were required.

III. RESPONSES TO COMMENTS ON THE DRAFT EIR

COMMENT LETTERS

STATE AND REGIONAL AGENCIES

1. State of California Governor's Office of Planning and Research
   State Clearinghouse and Planning Unit
   Scott Morgan, Acting Director
   1400 Tenth Street, P.O. Box 3044
   Sacramento, CA 95812

2. South Coast Air Quality Management District
   Planning, Rule Development & Area Sources
   Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review
   21865 Copley Drive
   Diamond Bar, CA 91765

ORGANIZATIONS

3. Friends of Sunset Park
   Board of Directors
   P.O. Box 5823
   Santa Monica, CA 90405
   E-mail: friendsofsp@yahoo.com

4. Santa Monica Spoke
   Dr. Michael Cahn

FORM LETTER

5. Form Letter signed and submitted by the following individuals:

   Meghan Atwater
   1418 Grant Street
   Santa Monica, CA 90405

   Betty A. Barker
   1417 Grant Street
   Santa Monica, CA 90405

   Jennifer L. Johnson
   1424 Bay Street
   Santa Monica, CA 90405

   Carla & Kurt Rundle
   1339 Pacific Street
   Santa Monica, CA 90405

Jamie Yarow
1128 Pacific Street
Santa Monica, CA 90405

Mary Ellen Young
1418 Grant Street
Santa Monica, CA 90405

Heinz & Regula Ziegler
1516 Grant Street
Santa Monica, CA 90405

INDIVIDUAL COMMENT LETTERS

6. Larry Arnstein
   1601 Hill Street
   Santa Monica, CA 90405

7. Tom Charchut
   2010 Navy Street
   Santa Monica, CA 90405

8. C. Dickinson
   texart68@verizon.net

9. James F. Dubois
   1502 Grant Street
   Santa Monica, CA 90049

10. Thomas Elias
    1720 Oak Street
    Santa Monica, CA 90405

11. Abby Hellwarth
    Sunset Park Resident
    ahellwarth@roadrunner.com

12. Doug Levitt
    1720 Cedar Street
    Santa Monica, CA 90405

13. Jeanne Payne
    1703 Pine Street
    Santa Monica, CA 90405
    jandjpayne.jp@verizon.net

14. John Reynolds
    Sunset Park
    johnreynolds@kavichreynolds.com

15. Susan Salem
    susanksalem@gmail.com

16. Robert W. Konecki
    rkonecki@hotmail.com

17. Michael T. Tanouye
    20 Village Park Way
    Santa Monica, CA 90405

RESPONSES TO DRAFT EIR COMMENT LETTERS

COMMENT LETTER No.1

State of California, Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Acting Director
1400 Tenth Street, P.O. Box 3044
Sacramento, CA 95812
June 8, 2010

Comment No. 1.1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 7, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Response No. 1.1

This comment acknowledges the Lead Agency has satisfied the CEQA requirements with respect to distributing the EIR to state agencies for the 45-day public review period. No response is required.

COMMENT LETTER No. 2

South Coast Air Quality Management District
Planning, Rule Development & Area Sources
Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review
21865 Copley Drive
Diamond Bar, CA 91765
June 4, 2010

Comment No. 2.1

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

AQMD staff is concerned that the lead agency failed to quantify localized air quality impacts from oxides of nitrogen (NO_x) and particulate matter (PM10 and PM2.5) emissions during project construction and operation. Without quantifying localized air quality impacts from these pollutants the lead agency is unable to support its conclusion for localized air quality impacts. Therefore, AQMD staff requests that the lead agency quantify potentially significant localized construction and operational air quality impacts from NO_X, PM10 and PM2.5 emissions and revise the CEQA document as appropriate. Further, AQMD staff recommends that in the event that the revised CEQA document demonstrates new significant adverse air quality impacts the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate potential air quality impacts. Staff is available to work with the lead agency to address these issues and any other questions that may arise.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response No. 2.1

In June of 2003 (revised July 2008) AQMD staff developed a Localized Significance Threshold Methodology to assist lead agencies in analyzing localized air quality impacts from Proposed Project. As noted therein, this methodology is guidance and is voluntary.[1]

Although not required, in an effort to meet the request of the AQMD, this Final EIR has been revised to quantify localized construction and operational air quality impacts from NO_X, PM_{10}, CO, and $PM_{2.5}$

[1] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003 (revised July 2008); see Preface and page 1-1.*

emissions. As shown in detail in Response to Comment 2.2 below, the Proposed Project would not exceed the thresholds of significance for localized construction and operational air quality impacts from NO_X, CO, PM_{10} and $PM_{2.5}$ emissions. As such, no additional mitigation measures are required and air quality impacts would remain less than significant. As requested, the AQMD will be provided a written response to this comment letter and will be notified of the public meeting prior to the adoption of the Final EIR.

Comment No. 2.2

AIR QUALITY ANALYSIS

Localized Significance Threshold

1. In addition to analyzing regional air quality impacts the AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). A localized analysis provides information on potential impacts to surrounding neighborhoods that a regional analysis may not reveal. While the lead agency analyzed the project's localized Carbon Monoxide (CO) impacts, potential localized air quality impacts from NO_x, PM10 and PM2.5 were not evaluated. A CO analysis alone is insufficient for evaluating localized air quality impacts, therefore, the AQMD staff requests that the lead agency quantify localized impacts by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/ceqa/handbook/LST/LST.htm.

Response No. 2.2

The Draft EIR constitutes a legally adequate analysis consistent with standard CEQA practical for evaluating construction and operational air quality impacts. Nevertheless, this Final EIR has been revised to quantify localized construction and operational air quality impacts from NO_X, CO, PM_{10} and $PM_{2.5}$ emissions. The following insert has been prepared and can be included as an addition to Section IV.C, Air Quality of the Draft EIR.

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount 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,[2] 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 $PM_{2.5}$. As the construction activity at the Main Campus includes multiple source locations in areas that total more than five acres, site-specific air dispersion modeling was conducted using AERMOD Version 6.5.0.

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

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and 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.

In conducting the analysis, the parameters of the sample construction scenarios provided by the SCAQMD were slightly modified such that they would apply to the project-specific characteristics of the Proposed Project. The resulting construction emissions generated were then analyzed against the applicable LSTs for each construction site. As shown in Tables III-1 through III-4, below, the peak daily construction emissions generated by the Proposed Project would not exceed the applicable LSTs for SRA 2 and therefore would not adversely impact any identified adjacent sensitive receptors. Please also refer to Appendix B of this Final EIR for the localized air quality calculation sheets. Localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Table III-1
Localized Estimated Peak Daily Construction Emissions – AET

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x[a]	CO	PM_{10}	$PM_{2.5}$
Grading/Excavation (2011)	***61.9***	***28.6***	***5.7***	***3.4***
SCAQMD Localized Thresholds[b]	198	1430	12	6
Significant Impact?	No	No	No	No
Building (2011)	***25.1***	***11.9***	***1.4***	***1.3***
SCAQMD Localized Thresholds[b]	198	1430	12	6
Significant Impact?	No	No	No	No
Building/Paving (2014)	***45.5***	***25.0***	***2.5***	***2.3***
SCAQMD Localized Thresholds[b]	198	1430	12	6
Significant Impact?	No	No	No	No

[a] *The localized thresholds listed for NO_x in this table adjusts for the more stringent federal 1-hour NO_2 of 0.10 ppm.*

[b] *The localized thresholds for construction emissions at a receptor distance of 82 feet for a 4.65-acre site in SRA 2 were calculated based on the linear regression methodology recommended by the SCAQMD.*

To determine whether operational emissions generated by the Proposed Project would result in localized air quality impacts, the net operational emissions associated with the development at the Performing Arts Campus will be evaluated and utilized as a screening tool for the other campuses. As discussed in Section II, Project Description of the Draft EIR, the Proposed Project includes net increases of gross square footage as follows for each campus: 11,296 GSF at the Main Campus, 63,608 GSF at the AET Campus, 75,000 GSF at the Olympic Shuttle Lot and 93,722 GSF at the PAC. As such, the PAC includes the largest increase in operational GSF and would have the greatest potential for an operational LST exceedance. Therefore, if the net increase associated with the PAC development would not exceed the applicable LST, it is reasonable to assume the other campuses would also not exceed the applicable LSTs.

Table III-2
Localized Estimated Peak Daily Construction Emissions - PAC

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x[a]	CO	PM_{10}	$PM_{2.5}$
Demolition (2012)	***14.4***	***9.2***	***1.0***	***0.9***
SCAQMD Localized Threshold[b]	115	735	6	4
Significant Impact?	No	No	No	No
Excavation (2012)	***27.8***	***13.1***	***3.8***	***1.8***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Grading (2012)	***28.4***	***14.1***	***1.5***	***1.3***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Building (2012)	***21.7***	***10.7***	***1.2***	***1.1***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No
Building/Paving (2013)	***42.5***	***24.4***	***2.6***	***2.4***
SCAQMD Localized Thresholds[b]	115	735	6	4
Significant Impact?	No	No	No	No

[a] *The localized thresholds listed for NO_x in this table adjusts for the more stringent federal 1-hour NO_2 of 0.10 ppm.*

[b] *The localized thresholds for construction emissions at a receptor distance of 82 feet for a 1.72-acre site in SRA 2 were calculated based on the linear regression methodology recommended by the SCAQMD.*

For operational emissions, the LST methodology is only applicable to the on-site emission sources at a Project Site. Consequently, this analysis only evaluates the emissions generated by the on-site stationary sources (e.g., water and space heaters, landscaping equipment, etc.) and mobile sources (i.e., vehicular travel within the sites) associated with the Proposed Project at the PAC.

Table III-5, Localized Estimated Daily Operational Emissions, analyzes the net daily operational emissions generated by the on-site stationary and mobile sources associated with the proposed development at the PAC against the SCAQMD's localized operational emission thresholds.[3]

[3] *The daily operational emissions generated by the stationary sources associated with the PAC are taken from the emission sources (with the exception of the mobile sources) that have been generated by the URBEMIS computer model. The daily operational emissions generated by the mobile sources onsite at the PAC are generated by a URBEMIS run where a travel distance of 0.1 mile is inputted to account for vehicular travel within the PAC site. See Appendix B to this Final EIR for URBEMIS sheets.*

Table III-3
Estimated Maximum Daily Pollutant Concentrations
from Main Campus Construction at Off-Site Receptors

Timeframe	Pollutant Concentrations[a]						
	1-Hour NO_2 (ppm)	Annual NO_2 (ppm)	1-Hour CO (ppm)	8-Hour CO (ppm)	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)	24-Hour $PM_{2.5}$ ($\mu g/m^3$)
Q3 2012	0.072	0.023	3.10	2.02	0.84	0.07	0.76
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q4 2012	0.072	0.023	3.10	2.02	0.84	0.07	0.76
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q1 2013 – Q4 2013	0.70	0.022	3.09	2.02	0.81	0.064	0.74
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q1 2014	0.073	0.024	3.17	2.05	1.98	0.33	1.78
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q2 2014	0.078	0.026	3.26	2.09	3.23	0.62	3.00
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q3 2014	0.088	0.029	3.43	2.12	4.53	0.71	4.05
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q4 2014 – Q2 2015	0.073	0.024	3.2	2.07	2.47	0.53	2.26
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q3 2015	0.077	0.024	3.34	2.12	4.16	0.75	3.78
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q4 2015	0.08	0.026	3.43	2.14	5.01	0.93	4.60
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q1 2016 – Q2 2016	0.075	0.023	3.33	2.11	3.11	0.52	2.86
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No
Q3 2016	0.091	0.028	3.96	2.29	9.33	0.94	8.43
SCAQMD Thresholds	0.10	0.03	20	9.0	10.4	1.0	10.4
Significant Impact?	No	No	No	No	No	No	No

[a] *Maximum concentrations were estimated using unit emission factors (all emission rates set to 1.0 g/s) in the AERMOD modeling program and then multiplied by the emission rates during post-processing. This allows the modeler to estimate concentrations for multiple pollutants, multiple sources and construction phases. However this approach overestimates concentrations from multiple sources since the point of maximum impact is likely different for each emission source since in the unit emission factor approach, the maximums are summed regardless of location). Therefore, for the PM10 concentrations for Q3 2016, an additional modeling run was conducted using the actual emission rates for each source (see Table III-4).*

Table III-4
Estimated Maximum Daily Pollutant Concentrations from Main Campus Construction During Q3 2016 at Off-Site Receptors Using Refined Air Dispersion Modeling for Construction

	24-Hour PM_{10} ($\mu g/m^3$)	Annual PM_{10} ($\mu g/m^3$)
Air Concentration	6.2	0.94
SCAQMD Thresholds	10.4	1
Significant Impact?	No	No

As shown in Table III-5, below, on-site operational emissions generated by the PAC would not exceed the established SCAQMD localized thresholds for NO_x, CO, PM_{10}, and $PM_{2.5}$. Thus, the localized air quality impacts resulting from net operational emissions associated with the Proposed Project at the Main Campus, AET Campus, and Olympic Shuttle Lot would also be less than significant. No further response is required.

Table III-5
Estimated Localized Air Quality Impacts at PAC– Operation

Operational Phase	Total On-site Emissions (Pounds per Day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions				
Future Net With Project Emissions				
Natural Gas Usage	0.91	0.76	0.00	0.00
Landscape Maintenance Equipment	0.02	1.55	0.01	0.01
Mobile (Vehicle) Sources	1.55	14.45	0.42	0.11
Total Emissions	***2.48***	***16.76***	***0.43***	***0.12***
SCAQMD Localized Thresholds	103	562	1	1
Significant Impact?	No	No	No	No
Wintertime (Non-Smog Season) Emissions				
Future Net With Project Emissions				
Natural Gas Usage	0.91	0.76	0.00	0.00
Mobile (Vehicle) Sources	1.78	19.21	0.42	0.11
Total Emissions	***2.69***	***19.97***	***0.42***	***0.11***
SCAQMD Localized Thresholds	103	562	1	1
Significant Impact?	No	No	No	No
Source: Christopher A. Joseph & Associates, 2010				

Comment No. 2.3

AIR QUALITY MITIGATION

Regional and Localized Mitigation Measures

2. In the event that the lead agency's Revised Draft EIR or Final EIR demonstrates that any criteria pollutant emissions from the localized construction emissions analysis requested in comment #1 create significant adverse impacts, AQMD staff recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the AQMD's CEQA webpage at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm.

Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

Response No. 2.3

As shown in detail in Response to Comment 2.2 above, the Proposed Project would not exceed the thresholds of significance for localized construction and operational air quality impacts from NO_X, CO, PM_{10} and $PM_{2.5}$ emissions. As such, no additional mitigation measures are required and air quality impacts would remain less than significant. It should be noted that page IV.C-27 of the Draft EIR states the Proposed Project would be required to comply with SCAQMD Rule 403—Fugitive Dust. No further response is required.

COMMENT LETTER No. 3

Friends of Sunset Park
Board of Directors
P.O. Box 5823
Santa Monica, CA 90405
E-mail: friendsofsp@yahoo.com

Comment No. 3.1

1. Access to the Draft EIR documents:
a. Notice of availability of the Draft EIR

SMC's public notice in the Santa Monica Daily Press, dated 04/22/10, was illegible due to the extremely small font size and use of gray ink on gray background. The subsequent Daily Press notices, including

5/25/10, were published very close to the June 4 comment deadline and, while more legible, were also misleading as the replacement of Corsair Stadium was not listed.

Response No. 3.1

The Notice of Availability (NOA) was published in the Santa Monica Daily Press on April 22, 2010. The publication in the Santa Monica Daily Press was printed in a manner that is consistent with the font and legibility standards for legal advertisements. A separate copy of the NOA, dated April 21, 2010, was mailed to all identified state, local, and public agencies with jurisdiction over the Project or within the project area, as well as to those agencies, organization and/or individuals who commented on the NOP or otherwise requested to be notified. Thus, the NOA was provided in accordance with the requirements of Public Resources Code Section 21092. The subsequent Daily Press Notices were provided in addition to the initial notice as a courtesy by the Lead Agency and go beyond what is legally required under CEQA.

Comment No. 3.2

b. Availability of Draft EIR documents

Having hard copies of the documents available only at the Administration Building, and only during business hours Monday through Friday, does not make them available for residents who work 9-to-5 jobs. Only one hard copy was made available to the local neighborhood organization, Friends of Sunset Park. We don't know if hard copies were made available to:

i. the Pico Neighborhood Association,
ii. John Adams Middle School,
iii. the pre-school on the John Adams campus,
iv. Will Rogers Elementary School (between 14th and 16th Streets),
v. the pre-school adjacent to the church on the SW corner of Pearl and 16th, or
vi. the WISE and Healthy Aging adult daycare center on Pico just west of 16th St.

When a resident living near the college requested a hard copy, it took 2 weeks for the college to provide that. With $590 million in bond money at its disposal from the last three ballot measures (Measure U in 2002, Measure S in 2004, and Measure AA in 2008), we don't understand the college's inability to provide these documents in a timely manner.

Response No. 3.2

The distribution and availability of the EIR was conducted in accordance with the CEQA Guidelines. CEQA requires that the Draft EIR be readily available to the public during the 45-day public review period. As stated in the NOA a complete electronic copy of the Draft EIR on the college's website at www.smc.edu/facilities_masterplan and printed copies of the EIR were available for the public to review at the Administration Building at 1900 Pico Boulevard. The college received no requests for copies of the Draft EIR from any of the local schools or community groups noted above. As noted by this comment,

copies of the EIR were distributed to the Friends of Sunset Park and others who requested copies. Furthermore, no requests to extend the public comment period on the Draft EIR were received prior to the close of the 45-day public comment period. In addition, no late comment letters were received by the lead agency.

Comment No. 3.3

c. Protected status of online DEIR files

The documents posted online at www.smc.edu/facilities_masterplan contain up to 48 megabytes, more than many people can download on their home computers. Due to the "protected" pdf status of the online document, "copy and paste" commands are disabled. In order to quote language from the document, one has to try to print out and then re-type the sections under discussion.

Conclusion: The result is that many residents living near the SMC campuses and parents of children attending schools nearby have not have adequate access to the information needed in order to comment on the Draft EIR. The public process is thwarted when this happens. This is especially galling since these same residents are providing the funds for the proposed construction projects in the plan.

Response No. 3.3

Although it is not legally required, it is common practice for lead agencies to protect electronic files on environmental documents that are made available for public review over the internet. This practice ensures that the document or entire sections of the document can be printed in whole or in part, but not modified or altered by the public. As a legal document, it is important for the lead agency to protect the integrity of the production and reproduction of the EIR.

Comment No. 3.4

2. Adequate information not included in the DEIR:

The DEIR is incomplete, as it does not address, for example, the impact demolishing and rebuilding the 3-story cement Corsair Stadium will have on schools and homes around the Main Campus.

The following issues will have to be explained in the EIR:

The EIR will have to list guarantees to assure neighbors, and parents of school children from any of the schools surrounding this location, that SMC is prepared to deal with lawsuits ensuing from health problems resulting from concrete dust created by the demolition and rebuilding of the stadium.

The EIR also will have to list guarantees to homeowners/neighbors that SMC will repair structural and other potential damage created by the replacement of the stadium.

Response No. 3.4

The proposed demolition and reconstruction of Corsair Stadium is addressed in the Draft EIR. Specifically, page II-19 of the Draft EIR states that Corsair Stadium would be demolished and replaced in the same location with a new stadium that is approximately the same height and footprint as the existing stadium. The impacts related to the demolition of Corsair Stadium are included in the construction related air quality emission modeling as shown on Section IV.C Air Quality of the Draft EIR. Table IV.C-8, Construction Parameters, identifies all of the associated construction activities planned to occur on each campus. For the Main Campus, the Corsair Stadium/ESL demolition estimates are stated to occur on a 1.34-acre site with 29,686 square feet of demolition and 0.75 acres of surface areas to be paved. It should be noted the modeling assumptions are based on asphalt paved surfaces, which generate increased emissions associated with off gassing. This estimate provides for a conservative estimate as the 0.75 acres of paved surfaces would be improved with various hardscape materials other than asphalt such as pre-formed concrete pavers, blocks, concrete and/or crushed rock materials. The estimated daily peak construction emissions are reported in Table IV.C-9.

With respect to contaminants and potential health issues to local sensitive receptors, the air quality analysis in the Draft EIR concludes that the Proposed Project would not include any land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants, and no toxic airborne emissions would result from its implementation. In addition, construction activities associated with the Proposed Project would be typical of other sites in the City, and 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 (see Draft EIR page IV.C-31).

With respect to the proposed demolition and reconstruction of Corsair Stadium and the potential for structural impacts upon neighboring properties, no impacts are expected to occur. The minimum distance between Corsair Stadium and the nearest off-site structures (the single-family residences along 16th Street), is greater than 60 feet, with 16th Street in between. Construction activities such as jackhammering, scraping asphalt, excavating soil and building construction would not result in any physical impacts to structures located at a distance of 60 feet. Nevertheless, in the event that any unforeseen impacts do occur and are found to be a result of construction activities on the SMC campus, the appropriate actions to repair or replace any damage would be conducted in accordance with District Policy and all applicable laws and regulations. It should also be noted that SMC has completed several improvement projects near and adjacent to other commercial, school, and residential land uses without incident and has demonstrated good housekeeping practices on all construction sites.

Comment 3.5

Page II-21, paragraph 1) states that the concrete stadium structure is showing some deterioration of the concrete and does not meet current seismic standards. We do not dispute that. We are requesting, however, that the Corsair Stadium be repaired properly and retrofitted. Building handicap access can be

incorporated in this process. Relocating the ESL buildings will provide space for this adjustment.

The EIR will have to show, in detail, the option and the results of repairing and retrofitting of the stadium, with inclusion of handicap access.

Response No. 3.5

SMC has investigated the option to repair, restore and upgrade Corsair Stadium and has found this option to be infeasible from both an economic and technical basis. For one, the geotechnical upgrades required to meet seismic code safety regulations and ADA access requirements would involve a considerable amount of demolition to cut and reinforce cement foundations. In this regard, little benefit would be realized in terms of avoiding construction impacts because much of the cement would need to be jackhammered, cut and removed from the site. In addition, a planned reinforcement effort would take longer to design and implement and would extend the overall duration of the renovation or construction process. (See the Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, included as Appendix D to this Final EIR.)

Comment No. 3.6

Page II-21, paragraph 2) states: To provide for a central plant. A central heating and cooling system for the Main Campus would provide cost savings and energy savings. We do not dispute this. However, the exact location of this proposed central plant is not included.

Response No. 3.6

The location of the Central Plant is identified in Figure II-6, Main Campus — Proposed Project, on page II-12 of the Draft EIR. The Central Plant is identified and marked as item 2 on the site plan and is located adjacent to the northeast corner of Corsair Stadium site and west of the Health/Physical Education/Fitness Dance site buildings.

Comment No. 3.7

Page IV, K-1, Main Campus, paragraph 4) The omission of Will Rogers Elementary School, the Preschool on 17th St. just south of Pearl, the Preschool adjacent to the church on the SW corner of Pearl and 16th Street, and Mount Olive Preschool on 14th St. is unacceptable. Children at these schools, in addition to John Adams Middle School, will be negatively affected by concrete dust and noise. Depending on weather conditions, even Grant Elementary School, as well as the neighborhoods south and east of the college, will be affected. So will Pico Neighborhood residents.

Response No. 3.7

The nearby land uses cited in this comment are noted for the record. The Draft EIR identified 13 sensitive receptor land uses immediately surrounding the Campus. (See page IV.C-12 and IV.C-13 of the

Draft EIR). The EIR found that impacts from construction emissions would be less than significant with mitigation. As such the impacts upon the sensitive receptors that were identified in the EIR would be less than significant with mitigation as well. The omission of identifying other potentially sensitive land uses located further away than the ones noted by name in the Air Quality section of the EIR does not render the EIR inadequate or incomplete. Dispersion modeling demonstrates that construction related air emissions drop off with distance. Thus it is logical to assume that if sensitive receptors adjacent to the SMC campus would be exposed to air emissions below the significance threshold (with mitigation), then other sensitive receptors located farther away from the main Campus would be exposed to emissions that would be lower than those reported at the site.

Comment No. 3.8

The EIR will have to explain in details, the process of Asbestos testing and removal, as well as concrete dust containment, during the planned demolition and rebuilding.

Response No. 3.8

As stated in Section IV.D, Hazards and Hazardous Materials, in the Draft EIR, exposure to asbestos containing materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable state and federal rules and regulations. A full copy of Rule 1403 identifying the applicable procedures and requirements for abating asbestos containing materials is included in Appendix C to this Final EIR. Compliance with Rule 1403 is a legal requirement and has also been incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the Proposed Project. Furthermore, the SMC Facilities Planning Department will require contractors to perform the necessary testing to determine the presence or absence of ACMs prior to any demolition activities.

Comment No. 3.9

Santa Monica College Career & Educational Facilities Master Plan 2010 Update

Draft, 4.0 Project Criteria, page 45, 4.6.2 Health/P.E./Fitness/Dance Central Plan, paragraph 3) states: Some facilities of the Central Plant are built underground and may be located in the Corsair Field area.

The Central Plant is not discussed in the following Program and Performance sections.

The EIR will have to state, very clearly, where this Central Plant will be built.

Response No. 3.9

The location of the Central Plant is identified in Figure II-6, Main Campus - Proposed Project, on page II-12 of the Draft EIR. The Central Plant is identified and marked as item 2 on the site plan and is located adjacent to the northeast corner of Corsair Stadium site and west of the Health/Physical Education/Fitness Dance site buildings.

Comment No. 3.10

What else is the college planning to build under the Corsair Field, without proper notification to the public?

The EIR will have to state, in detail, any other plans the college has for the Corsair Field.

Does the college, for example, have undisclosed plans for developing a new performance venue at Corsair Field? Is the vision to have it become another Universal Amphitheatre, a new Greek Theatre, a mini-Hollywood Bowl, right across the street from homes? During a recent "Celebrate America!" event, the amplified "music" from the stadium could be heard all the way down to Dewey St., next to Penmar Golf Course.

Sunset Park does not aspire to become a "college town," nor does it aspire to become the Entertainment Capitol of the World.

Conclusion Regarding Corsair Stadium: We request that the college choose the No Project Alternative for the Corsair Stadium. Repairing properly, retrofitting and adding handicap access is a practical and far less expensive solution than demolishing and rebuilding. The stadium has been used repeatedly and has apparently been functioning safely since the 1994 earthquake, so we don't understand the need to replace, rather than repair.

Response No. 3.10

The Draft EIR includes a detailed account of all projects and construction activities that are proposed to be implemented as part of the SMC Career and Educational Master Plan (2010 Update). A copy of the Draft Master Planning document is contained as Appendix I to the Draft EIR. Any new projects or plans that are not described in the Draft EIR or proposed Master Plan would require approval by the SMC Board of Trustees and would be subject to additional environmental analysis pursuant to CEQA.

The preference for the No Project Alternative for the Corsair Stadium is noted and will be forwarded to the decision makers for their consideration.

Comment No. 3.11

3. Transportation/Traffic/Parking:

a. Page IV.J-55 – Traffic Analysis – 29 intersections "are determined to have significant traffic impacts due to the Project" including Lincoln at Pico and Ocean Park Blvd., 18th at Pico and Ocean Park Blvd., 20th at Olympic and Pearl, 21st and 22nd at Ocean Park Blvd., 23rd at Pico, Pearl, and Ocean Park Blvd., Cloverfield at the I-10 and Pearl, Stewart at Exposition, etc.

The EIR will have to state mitigations for those traffic impacts.

Response 3.11

Refer to Page IV.J-79 through IV.J-82 of the Draft EIR for a discussion regarding the recommended Mitigation Measures outlined for the Proposed Project. The Mitigation Measures primarily outline the implementation of a Transportation Demand Management (TDM) plan to reduce vehicular traffic and parking generated by the various project campuses. The TDM measures implemented as part of the Project will be aimed at decreasing the number of vehicular trips generated by persons traveling to/from the site by offering specific facilities, services, and actions designed to increase the use of alternative transportation modes (e.g., transit, rail, walking, bicycling, etc.) and ridesharing.

Consistent with the objectives of the City's Draft LUCE, the goal of the SMC TDM plan is to manage the total aggregate trip generation of the SMC Main Campus, AET, Olympic Shuttle Lot, and PAC campuses such that the PM peak hour trip generation would not exceed pre-Project levels (see Mitigation Measure J-3). While the overall SMC system would be "traffic neutral" the actual trip reductions measured at each campus may vary considerably, and may not be equivalent to the potential increases otherwise forecasted for each campus. Thus, even if the aggregate trip reduction targets are attained, some campuses may generate additional trips as compared to current conditions following Project completion while other campuses may experience a relative decrease in trips. Accordingly, due to the high sensitivity of the City of Santa Monica's significant traffic impact thresholds utilized in the assessment of impacts at the study intersections and street segments, it is likely that some locations would still experience traffic increases due to the Project that would cause traffic impacts to be deemed significant. Nevertheless, the implementation of the SMC TDM plan is recommended to eliminate the significant traffic impacts at some locations and reduce the level of severity of the significant traffic impacts at other locations.

Other measures have been considered to reduce the significant transportation impacts forecast through the provision of additional intersection capacity under either the weekday AM and PM peak hour, or weekend mid-day peak hour conditions to less than significant levels. A discussion of the capacity enhancement measures at the study intersections is provided in Appendix K of the Traffic Study of the Draft EIR. These measures primarily focus on increasing the capacity of the affected intersections through improvements such as roadway restriping, roadway widening, changes in existing traffic signal operations, and/or installation of new traffic signals. As such, it is recommended that the capacity enhancement measures not be considered as potential traffic mitigation for the following reasons:

- Implementation of the potential measures is beyond the control of the Lead Agency (and therefore is not a certainty) as the improvements would require approval from the City of Santa Monica, the City of Los Angeles, and/or Caltrans in order to permit construction;
- Many of the potential measures would require the removal of existing curbside parking spaces, which could result in secondary adverse impacts due to the loss of curbside parking, which is heavily utilized in an urban area such as Santa Monica;
- The City of Santa Monica by practice typically does not allow street widening, particularly if it causes a reduction in sidewalk/parkway width; and
- The relatively high costs of implementing the potential capacity enhancement measures substantially outweigh the relative low severity of the potential traffic impacts due to the Project.

Comment No. 3.12

b. Page IV.J-61 – Street Segment Impacts – The proposed update is expected to create significant impacts at 13 studied street segments, including 14th St., Pearl St., 20th St., 23rd St., Colorado Avenue, Stewart St., and Yale St.

The EIR will have to state mitigations for those street segment impacts.

Response No. 3.12

The comment is correct in stating that 13 of the 66 study street segments are identified to result in significant impacts with application of the City of Santa's threshold criteria during the weekday conditions. The project is not expected to create any significant impacts at any of the 12 study street segments during the weekend conditions. As referenced in page 96 of the Traffic Study of the Draft EIR, for street segments with potential significant Project-related impacts, measures considered for implementation could include installation of traffic calming measures, such as speed bumps, curb extensions, narrowed travel lanes, and enhanced crosswalks. These mitigation measures would likely reduce, but not eliminate the impact. Additionally, such mitigation measures would create inconveniences to local residents, essentially shifting cut-through traffic to other local streets and potentially creating secondary impacts by limiting access. Thus, consistent with the City's CEQA practice these measures have been determined to be infeasible and are not recommended for mitigation of the street segment impacts.

Also refer to Response to Comment No. 3.11 for a full discussion regarding the TDM programming measures proposed as a mitigation measures for the Project.

Comment No. 3.13

c. Page IV.J-62 – Bus transportation – This section suggests that the solution to an overabundance of bus routes on residential streets near the Main Campus (Crosstown, Sunset Ride, SMC Commuter, Bundy Evening Shuttle, and the Intercampus Shuttle) is to have the Crosstown route stop at Pico, rather than continuing south to Ocean Park Blvd.

The Crosstown is the one bus route that serves residents, so to shorten its route so that it no longer connects with the #8 bus line on Ocean Park Blvd. solves nothing. The solution is to re-route the college-serving bus routes off of residential streets and onto arterials.

The EIR will have to state solutions other than shortening the Crosstown route.

Response No. 3.13

The suggestion on page IV.J-62 of the Draft EIR to have the Crosstown Ride stop at Pico Boulevard was recommended as it provides service in a clockwise loop along 20th Street, Ocean Park Boulevard, 17th Street, Pearl Street, 14th Street, and Montana Avenue. The Sunset Ride is a community circulator that accesses the SMC campuses in the central and eastern portions of the City of Santa Monica. Although the Sunset Ride traverses this segment of 20th Street; it is not a loop route like the Crosstown Ride. The Sunset Ride continues southbound on 20th Street to Ocean Park Boulevard, where it heads east to Bundy Drive before heading south to the SMC Bundy Campus and then returns using the same route. Thus, it would be infeasible to alter the route of the Sunset Ride to eliminate use of 20th Street.

Furthermore, the Big Blue Bus is a line department of the City of Santa Monica, reporting directly to the Santa Monica City Council and is not under the jurisdiction of the Santa Monica Community College District. As indicated in the Final Environmental Impact Report for the City of Santa Monica Land Use and Circulation Element (Volume 1, SCH No. 2009041117, April 2010), 20th Street is identified as an existing "connecting" transit route from Montana Avenue to Ocean Park Boulevard. However, the Santa Monica Community College District will coordinate with the Santa Monica Big Blue Bus to discuss these concerns and explore other routes opportunities near the SMC Main Campus.

Comment No. 3.14

d. Cycling issues: The document lacks an analysis of the current conditions for bicycle traffic near the various campuses. No baseline bicycle traffic counts are included, although the U.S. Department of Transportation requires traffic counts for "active transportation trips." (www.dot.gov/affairs/ 2010/bicycle-ped.html)

The study does not seem to address the current lack of a safe bicycle route from 17th St. and Pico onto the Main Campus, or a safe route across the campus from 17th and Pico to 17th and Pearl.

The EIR will have to provide the missing information and include options for improving bicycle access to the various campuses, as well as a safe bike route across the Main Campus.

Response No. 3.14

This comment refers to the United States Department of Transportation (DOT) Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations signed on March 11, 2010 and announced on March 15, 2010. The policy statement reads in total, "The DOT policy is to

incorporate safe and convenient walking and bicycling facilities into transportation projects. Every transportation agency, including DOT, has the responsibility to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems. Because of the numerous individual and community benefits that walking and bicycling provide – including health, safety, environmental, transportation, and quality of life – transportation agencies are encouraged to go beyond minimum standards to provide safe and convenient facilities for these modes."

DOT makes a number of recommendations that it encourages other government agencies to adopt, including going beyond minimum design standards, improving non-motorized facilities during maintenance projects, and collecting data. The comment that the DOT requires traffic counts is an overstatement, rather the DOT recommends collecting data. Santa Monica College is not a transportation agency. Nonetheless, while not a requirement of this environmental study, the Appendix B of the Traffic Study contains the traffic count data for the study intersections. Included in the vehicle turning movement counts are counts of the pedestrian trips and bicycle trips observed at each leg of the study intersection. As shown in the attached Table III-6, the bicycle trips for intersections adjacent to the Main Campus account for approximately one to four percent of the total number of trips (i.e., vehicles, bicycles, and pedestrians) observed at the site adjacent study intersections. For example, the intersection of 17th Street/Pico Boulevard (adjacent to the Main Campus), was observed to have a total of 1,879 vehicle trips, 25 bicycle trips, and 235 pedestrian trips during the AM peak hour and 2,183 vehicle trips, 34 bicycle trips, and 297 pedestrian trips during the PM peak hour. For this intersection, the bicycle trips accounted for approximately one percent of the total number of trips during both morning and afternoon peak hours. These traffic volumes, including bicycle trips as well as the pedestrian trips, were inputted in the TRAFFIX model and considered in the overall intersection traffic analysis for determining the saturation flow rates and levels of service at each of the study intersection.

With regard to the comment regarding safe bicycle routes, SMC regulates the riding of bicycles on pedestrian walkways. SMC Board Policy 2460 provides: "Riding of bicycles, motorcycles, and mopeds is prohibited on pedestrian walkways." Similarly, Municipal Code Section 3.12.540 for the City of Santa Monica provides: "It shall be unlawful to ride a bicycle or to coast in any vehicle upon any public sidewalk…"

Board Policy 2460 was formulated to respond to the high density of pedestrian activity on the campus walkways as a safety measure. Almost all bicycle users on the Main campus are students or employees, and Board Policy effectively provides for a safe environment. In addition, users who are not students and who are not employees are nonetheless bound by Board Policy. Thus, while the campus is not gated and is open at all times and is permeable to active transportation users (other than students and employees) including those traveling to the adjacent schools, such bicyclists are required to walk their bikes through the campus.

Table III-6
Existing Vehicles, Bicycles, and Pedestrians Traffic Volumes
SMC Career and Educational Facilities Master Plan 2010 Update

No.	Intersection	Peak Hour Beginning		Vehicles		Bicycles		Pedestrians	
				Trips	%	Trips	%	Trips	%
Adjacent to SMC Main Campus									
55	16th Street/Pico Boulevard [1]	AM	7:30	1,827	95%	23	1%	71	4%
		PM	4:30	1,741	96%	18	1%	56	3%
56	16th Street/Pearl Street [1]	AM	7:30	1,090	79%	28	2%	256	19%
		PM	4:45	696	79%	37	4%	146	17%
60	17th Street/Pico Boulevard [1]	AM	7:15	1,879	88%	25	1%	235	11%
		PM	4:45	2,183	87%	34	1%	297	12%
61	17th Street/Pearl Street [1]	AM	7:30	885	61%	43	3%	530	36%
		PM	5:00	625	63%	38	4%	329	33%
63	18th Street/Pico Boulevard [1]	AM	7:45	1,812	95%	14	1%	84	4%
		PM	5:00	2,118	94%	17	1%	117	5%
64	18th Court/Pico Boulevard [1]	AM	7:45	1,844	61%	33	1%	1,164	38%
		PM	5:00	2,139	78%	32	1%	575	21%
67	19th Street/Pico Boulevard [1]	AM	7:45	1,865	95%	15	1%	86	4%
		PM	5:00	2,120	93%	21	1%	132	6%
77	20th Street/Pico Boulevard [1], [2]	AM	7:45	3,274	89%	65	2%	341	9%
		PM	5:45	3,668	87%	61	1%	484	11%
78	20th Street/Pearl Street [2]	AM	7:45	1,237	88%	39	3%	133	9%
		PM	5:00	1,264	91%	35	3%	86	6%
Adjacent to SMC AET Campus									
103	Stewart St./Pennsylvania Avenue [2]	AM	8:45	888	95%	26	3%	19	2%
		PM	5:00	1,141	96%	27	2%	16	1%
104	Stewart St./Nebraska Avenue [3]	AM	8:45	1,104	97%	14	1%	19	2%
		PM	5:45	1,240	98%	9	1%	12	1%
Adjacent to SMC Olympic Shuttle Lot									
105	Stewart St./Olympic Blvd. [3]	AM	8:30	3,202	97%	38	1%	62	2%
		PM	5:00	3,218	97%	38	1%	46	1%
106	Stewart St./Exposition Blvd. [3]	AM	8:30	1,081	95%	13	1%	48	4%
		PM	6:00	1,115	97%	11	1%	22	2%
Adjacent to SMC PAC Campus									
20	10th St./Arizona Avenue [1]	AM	9:00	459	82%	40	7%	62	11%
		PM	4:00	614	92%	19	3%	38	6%
21	10th St./Santa Monica Blvd. [1]	AM	9:00	1,255	94%	20	1%	59	4%
		PM	5:30	1,410	94%	29	2%	66	4%
27	11th Street/Arizona Avenue [1]	AM	8:45	1,158	89%	60	5%	85	7%
		PM	5:00	1,238	91%	42	3%	81	6%
28	11th St./Santa Monica Blvd. [1]	AM	8:30	2,023	94%	38	2%	93	4%
		PM	5:00	2,191	94%	43	2%	108	5%

[1] Counts conducted by City Traffic Counters in Fall 2008.
[2] Counts conducted by Accutek Traffic Data in Fall 2008.
[3] Counts conducted by The Traffic Solution in Fall 2008.
Source: Linscott Law and Greenspan Engineers, 2010.

SMC understands that an expanded use of the campus pathways by groups such as those participating in a possible Suggested Routes to School program at either John Adams or Will Rogers would require inter-agency coordination.

In that spirit, SMC recently (April 28, 2010) wrote a letter in support of a grant application by Sustainable Streets in cooperation with the City and the Schools to integrate College campus planning with street planning with regard to bicycle, pedestrian, and transit use. SMC will also continue to work with City staff to explore other north-south routes around the Main campus.

Comment No. 3.15

4. Inaccurate information on college enrollment.

The documents state the SMC enrollment at 30,000. According to the California Community College Chancellor's Office, enrollment in Fall 2009 was 32,327, including 2,103 students from out-of-state, and 2,954 students from foreign countries.

The EIR will have to include accurate enrollment information.

Response No. 3.15

A detailed chart showing SMC's enrollment history from 2005 to 2010 is provided in Table III-7, below. As shown in Table III-7, SMC's on-ground student enrollment has remained relatively constant averaging 27,010 students for the 6-year period.

Table III-7
SMC's Detailed Enrollment Summary Final Enrollment
Headcount and Final Unit Count (2005 to 2010)

	On-ground Classes		Online Classes		Total Enrollment		
Year	**Final Headcount**	**Final Units**	**Final Headcount**	**Final Units**	**Final Headcount**	**Final Units**	**Online % of Total Enrollment**
2005	26,747	190,623	3,024	26,876	29,771	217,499	10.2
2006	27,079	187,803	3,738	33,370	30,817	221,173	12.2
2007	26,209	182,738	5,070	45,150	31,279	227,888	16.2
2008	26,544	184,711	6,125	53,000	32,669	237,711	18.7
2009	28,321	200,351	6,643	57,380	34,964	257,731	19
2010	27,163	197,276	7,125	64,890	34,288	262,166	20.8
6-Year Ave.	*27,010*	*190,573*	*5,288*	*46,788*	*32,298*	*237,361*	*16.18*
Source: Santa Monica College, 2010.							

In 2005, the on-ground enrollment was 26,747 students and in 2010, the on-ground enrollment was 27,163 students, an increase of 416 students over the 6-year period. During this same period, SMC's online student enrollment has more than doubled, from 3,024 students in 2005 to 7,125 students in 2010. In total, in 2005 SMC had a headcount of 29,711 students and in 2010 a headcount of 34,288 students. The average total headcount over the 6-year history from 2005 to 2010 is 32,298 students. This historic enrollment data suggests an annual growth rate in total enrollment of approximately 2.8% per year. However, it is important to note that SMC's online enrollment has increased at a higher pace than the total enrollment growth rate. The 6-year historic attendance for online classes has increased from 3,024 students in 2005 to 7,125 students in 2010. This represents an approximate 19% annual growth rate for online courses.

Comment No. 3.16

5. Providing facilities for an ever-growing SMC enrollment

At its July 7, 2009 meeting, the SMC Board of Trustees budgeted $681,700 for advertising in 2009-2010 for student recruitment (KPWR 105.9 FM Radio, KROQ 106.7 FM Radio, LA Weekly newspaper, Santa Monica Daily Press, La Opinion newspaper, Los Angeles Sentinel, Korean Directory, SurfSantaMonica.com, Big Blue Bus, Facebook, Google, and Fluid Design).

The current document does not show how all the planned projects will be funded.

The EIR will have to state the number of future facilities bond measures, and the amount to be included in each, that the college plans to put on the ballot for Santa Monica and Malibu residents to pay for all of the facilities included in the Master Plan Update.

Response No. 3.16

The funding for the Proposed Project was disclosed in the Draft EIR. As stated on page II-10 of the Draft EIR, the Proposed Project provides for the orderly implementation of capital improvement projects as identified in Measure AA, a local bond measure approved by the voters of the District in November 2008. The specific improvements planned under the Proposed Project would be fully funded under the existing Measure AA and not dependent upon future initiatives.

COMMENT LETTER No. 4

Santa Monica Spoke

Comments SMC Master Plan (2010 Update) Draft EIR
Randal Lawson
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Santa Monica College

Comment No. 4.1

Santa Monica Spoke is a local bicycle advocacy group. We are pleased to submit the following comments on the project above. SMC currently has 3500 parking spaces. The plan under review will add approx 1400 parking spaces.

Response No. 4.1

A summary of the existing and future parking supply at SMC's Main Campus, AET Campus, Olympic Shuttle Lot and PAC Campus is provided on Table II-4, page II-18 of the Draft EIR. As shown on Table II-4, the baseline parking count for the existing campuses provide 3,520 parking spaces. The Master Plan is proposed to result in approximately 4,952 parking spaces total provided among the four campuses, resulting in a net increase of approximately 1,432 parking spaces.

Comment No. 4.2

Lacking expertise on bicycle issues: Both the DEIR and the Appendix F have very little to say about bicycles. It appears that the authors of the study have never cycled to or through the campus locations, have never attempted to park their bikes there, and study suffers from this lack of familiarity with bicycle traffic. This is disappointing, unprofessional, and we hope that future reports are produced with the collaboration of experts who can substantially assess the situation of bicycle traffic, furnish data baselines, address specific bicycle challenges and point to necessary improvements as traffic mitigation measures for the impacts of the project. The list of bike facilities in the vicinity of the campus is the most disappointing piece of bicycle traffic analysis we have seen in a long time. The reference to bicycle parking is just as disappointing, because it does not take into account the quality of these structures. Indeed, the report displays a pervasive inability to evaluate and comment on bicycle infrastructure in any substantial sense. The study recommends installation of bicycle parking, and in the framework of the outlined TDM program the usual language about bicycles is in evidence. However, none of these reference are specific to the site, and no attempt has been made to analyze the conditions of bicycle traffic in the vicinity of the SMC sites. Section 4.9.2 and 4.14.2 of the Master Plan 2010 Update are superficial and unsatisfactory.

Response No. 4.2

The analysis of the Project-related traffic impacts is provided in the Draft EIR in Section J. Transportation/Traffic/Parking. It is noted that primary focus of the Section relates to vehicular traffic, consistent with the CEQA Checklist adopted by the Lead Agency for this Project (see the Initial Study completed for the Project in Appendix A of the Draft EIR). Potential adverse effects due to the Project related to existing bicycle routes and bicycle parking are not required for consideration in the Draft EIR.

Nevertheless, the Draft EIR does provide information in terms of existing environmental setting as it relates to bicycle transportation. For example, the description of the existing bicycle routes provided in the vicinity of the SMC campuses is provided on page IV.J-18 and IV.J-19 of the Draft EIR. As noted in the Draft EIR, the bicycle routes are designated and maintained by the City of Santa Monica, not SMC. Further, while not required, the Draft EIR does provide recommendations to enhance travel to and from SMC campuses via bicycles, primarily for the purpose of reducing travel by motor vehicles. For example, Mitigation Measure J-21 on page IV.J-82 of the Draft EIR recommends that SMC coordinate with the City in an effort to enhance and expand the current network of bicycle routes serving the SMC campuses. Ultimately, the City has jurisdiction over the design and operation bicycle routes on City streets. Additionally, Mitigation Measure J-14 on page IV.J-81 of the Draft EIR recommends that SMC monitor and provide adequate parking for bicycles at SMC campuses.

The comment expresses concerns that the Draft EIR does not address "bicycle challenges" or "quality of these structures" (in reference to bicycle parking), but does not provide specific examples or concerns.

It is further noted that SMC has initiated and operates multiple programs to support alternative transportation to and between its campuses. In terms of reduction in use of private transportation, public transit provides the largest benefit. As noted on page IV.J-71 of the Draft EIR, a manual and video count of cars entering and leaving the Main campus and of students boarding and alighting Big Blue Bus taken during the Fall 2009 semester indicates that approximately 30 to 50% of the arrivals and departures from the Main campus during the peak traffic hours are by public transit compared to private transportation. SMC contributes to the use of public transit through the funding of its "Any Line, Any Time" program and through the operation of a small fleet of shuttle vans. An analysis of Fall 2009 enrollment indicates that approximately 20% of course units were earned online. Online enrollment continues to trend upward since its inception in 2001. Additionally, SMC offers its employees cash payments each month for use of the alternative transportation modes as listed above.

In terms of reduction of private vehicular traffic through support of bicycling as an alternative mode of transit, the College has in place a number of programs and planned improvements:

- As recommended by the District Planning Advisory Council, the College has established two areas of the Main campus as bicycle parking lots, one near Pico Boulevard and the other near Pearl Street. The first has been improved with 100 new racks of the preferred "wave" rack design, together with a bicycle pump station. This lot has been prioritized for the installation of a video surveillance camera as part of a number of campus-wide installations. The second is a temporary site that will be converted to a permanent site with new racks and video surveillance as

part of the planned IT/Telecom Relocation project on the Main campus.

- The College has included a phased program of replacement of bicycle racks that attach only to one wheel with racks of the preferred design, either wave or hoop, as one of the bond-financed campus infrastructure improvements.

- The College has included in the Student Services building now under construction at the northeast corner of the Main campus a new ground-level bicycle parking area to accommodate 80 additional bikes.

- The College has included new day-use showers and new day-use lockers in the new Physical Education building now in design that will provide bicyclists with shower and locker facilities.

- The College has included a new bicycle parking area at the ground level of the parking structure that is in final design at the Academy of Entertainment and Technology (AET) campus. As part of the Academy modernization project, the KCRW studios include an indoor storage site for bicycles and an employee showering station.

- While not bound by City requirements, the College has incorporated the City standard requiring the number of bicycle rack spaces to be at least five percent (5%) of the number of parking spaces into all new construction. At the Main campus, the number will be at least 15% of the number of parking spaces on the Main campus, and at the AET campus, the number will be greater than 15% of the number of parking spaces on the AET campus.

- With the construction of the new Pico Promenade improvements and plaza, the Entry Plaza, the new plaza between Parking Structure 3 and the HSS Building, and the new roadway improvements to the service drive between the Library and the Math Complex, the College will have a new north-south pedestrian corridor largely aligned with 17th Street and parallel to the recently opened Fountain Quad. As part of the Master Plan, the replacement Physical Education building will occupy a footprint that eliminates an existing building obstruction to the new corridor. (The building footprint will not extend as far east into the Fountain Quad as it does now.) Together, these improvements will provide design solutions as the College works with the School District on its Safe Routes to School programs.

- College staff and City staff meet on an ongoing basis to plan the transit, bicycle, and pedestrian connections from the College campuses to the planned Exposition Light Rail stations.

Comment No. 4.3

Bicycle Counts: The study provides extensive surveys of car traffic, but fails to provide bicycle traffic counts. This constitutes an inadequate analysis of the existing condition. Such counts are useful as baseline figures and should be part of the DEIR. At one point (p 112) the study states that bicycle counts were not required. The legal basis for the exclusion of bicycle counts is not apparent, and the exclusion contradicts the recent policy guidance issued by the US DOT which specifically demands traffic counts

for active transportation trips. www.dot.gov/affairs/2010/bicycle-ped.html. Additional analysis to provide data, and surveys to identify issues active transportation users confront on their trip to campus locations are necessary.

Response No. 4.3

The City of Santa Monica does not require obtaining counts for non-motorized modes of transportation, such as bicycles, skateboards, skating, or walking. The Santa Monica Community College District (SMCCD), as the lead agency for the project, has adopted City of Santa Monica thresholds of significance for intersections in the City of Santa Monica, and has adopted City of Los Angeles thresholds of significance for intersections in the City of Los Angeles. (It is noted that the Santa Monica-Malibu Unified School District has also adopted City of Santa Monica thresholds of significance for projects in Santa Monica.) As such, the City of Santa Monica, the School District, and the College provide counts for non-motorized modes of transportation in their environmental review documents.

The commentator refers to a recent policy statement announced on March 15, 2010, on bicycle and pedestrian accommodation regulations and recommendations by the U.S. Department of Transportation (DOT). The policy statement reads in total, "The DOT policy is to incorporate safe and convenient walking and bicycling facilities into transportation projects. Every transportation agency, including DOT, has the responsibility to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems. Because of the numerous individual and community benefits that walking and bicycling provide—including health, safety, environmental, transportation, and quality of life—transportation agencies are encouraged to go beyond minimum standards to provide safe and convenient facilities for these modes."

DOT makes a number of recommendations that it encourages other government agencies to adopt, including going beyond minimum design standards, improving non-motorized facilities during maintenance projects, and collecting data. The commentator's assertion that the DOT *demands* traffic counts is an overstatement, rather the DOT *recommends* collecting data. Santa Monica College is not a transportation agency. Nonetheless, while not a requirement of this environmental study, recommendations regarding the future collection of bicycle and pedestrian trip data will be forwarded to the decision-makers for their consideration.

The commentator references a footnote on page 112 of the Traffic Study of the Draft EIR, which reads "A substantial number of trips are made to and from the SMC campuses via walking and bicycling, but they were not required for documentation as part of this analysis." As required by the 2004 Congestion Management Program for Los Angeles County, that section of the Traffic Study focuses on the transit impact review of the CMP transit services in the area. Pursuant to the CMP guidelines, a separate evaluation of trips made via walking or bicycling was not required and thus the bicycle and pedestrian trips were not used for this comparison analysis of the mode split between public transit trips versus vehicular trips.

However, the commentator's statement that the study fails to provide bicycle traffic counts is incorrect. Appendix B of the Traffic Study contains the traffic count data for the study intersections. Included in the

vehicle turning movement counts are counts of the pedestrian trips and bicycle trips observed at each leg of the study intersection. As shown in the attached Table III-6 in response to Comment No. 3.13, the bicycle trips at intersections adjacent to the Main campus account for approximately one to four percent of the total number of trips (i.e., vehicles, bicycles, and pedestrians) observed at the site adjacent intersections. For example, the intersection of 17th Street/Pico Boulevard (adjacent to the Main Campus), was observed to have a total of 1,879 vehicle trips, 25 bicycle trips, and 235 pedestrian trips during the AM peak hour and 2,183 vehicle trips, 34 bicycle trips, and 297 pedestrian trips during the PM peak hour. For this intersection, the bicycle trips accounted for approximately one percent of the total number of trips during both morning and afternoon peak hours. These traffic volumes, including bicycle trips as well as the pedestrian trips, were inputted in the TRAFFIX model and considered in the overall intersection traffic analysis for determining the saturation flow rates and levels of service at each of the study intersection. It should further be noted that no adverse impact to bicycle or pedestrian trips were identified.

Comment No. 4.4

The study is silent about current shortcomings for bicycle access to campus locations: For example, riding your bicycle from 17th Street across Pico into campus is not at all trivial and a striking example for the low standard of bicycle implementation at this location. This location is an essential bicycle gateway waiting to happen, obstructed by a multiplicity of conflicting routes for car parking, lacking multimodal accommodation at a crucial location. Based on the current study, there is no indication that this poor level of bicycle infrastructure will see any improvements. The inadequate treatment of bicycle access to SMC campus sites has been justified with language about "lead agency" in the report. Of course the college is not free to build bike infrastructure on public roads (lead agency), but at the same time the Facilities Masterplan Update, especially its traffic chapter, would be an appropriate place to present a detailed bicycle traffic analysis, and suggestions for improvements. The DEIR fails to do so. In addition, substandard bicycle access points to the main campus (eg Pico & 17th Street) can not be justified with reference to local authorities.

Response No. 4.4

See Response to Comment 4.2 for a discussion regarding the consideration of bicycle traffic in the Draft EIR. The original campus was built with local bonds approved in 1946, 1950, 1957, and 1966, which allowed for continuity in planning. However, no other bonds were passed until 1994 (primarily due to restrictions imposed by Proposition 13) and as a result the projects completed in the 1970s, 1980s, and early 1990s were designed without an accompanying master plan. The more recent projects funded in the late 1990s and in the 2000s were designed according to a master plan adopted in 1998 and were funded with earthquake recovery funds and from bond measures in 2002, 2004, and 2008 conducted under Proposition 39. As a result, not only have there been many modernization and safety improvements for campus facilities, but significant improvements to infrastructure, transportation, and campus planning. Over the years, the Main Campus has consistently provided a vehicle and bicycle free campus to facilitate a safe pedestrian environment for students and faculty.

One of the most significant improvements to transportation has been to remove campus vehicles from the Main campus interior. The campus was originally bisected by Miller Drive, from Pico Boulevard to Pearl Street. Over time, the interior roadways and parking lots have been closed to traffic circulation. Today, the Main campus is entirely a pedestrian campus, with motorized vehicles limited to the campus areas near the campus boundary. Bicycle riders must park their bikes within the designated bicycle parking areas provided on the perimeter of the campus and/or walk their bikes while on campus. This process will continue with the improvements planned, approved, and under construction for the Student Services Replacement, Bookstore Modernization, and Pico Promenade Improvements Project. (More information about this project can be found at http://www.smc.edu/facilities_student _services/pdf_files/SMC_ Booket_Final_112907.pdf.)

The planned Pico Plaza and Bus Transit Plaza together with the Entry Plaza, all part of the Pico Promenade Improvements phase of the Board of Trustees-approved project, will provide solutions for current public transit, pedestrian, and bicycle congestion at the Pico entrance to the campus.

The proposed plan provides additional opportunity for the Pico Promenade improvements, by proposing additional flexibility for the new space for the bookstore and a small-scale retail space. An aerial rendering of the planned Pico Promenade project including the minor improvements provided for in the proposed Master Plan 2010 Update project is on page 73 of the Draft Master Plan.

Comment No. 4.5

Failure to discuss issues pertaining to bicycle access to campus is paired with a lack of recognition of issues of permeability of campus sites for active transportation users. The study does not address the manner in which the main campus is a significant barrier for cross-town bicycle traffic and does not offer mitigation for this impact. There are no routes for cyclists who want to ride through the campus in either direction. This barrier function created through the design of the site for bicycle through traffic has impacts for ongoing and future Safe Routes to School programs at the adjacent Schools (John Adams Middle School and Will Rogers Elementary).

Response No. 4.5

SMC regulates the riding of bicycles on pedestrian walkways. SMC Board Policy 2460 provides: "Riding of bicycles, motorcycles, and mopeds is prohibited on pedestrian walkways." Similarly, Municipal Code Section 3.12.540 for the City of Santa Monica provides: "It shall be unlawful to ride a bicycle or to coast in any vehicle upon any public sidewalk…"

Board Policy 2460 was formulated to respond to the high density of pedestrian activity on the campus walkways as a safety measure. Almost all bicycle users on the Main campus are students or employees, and Board Policy effectively provides for a safe environment. However, users who are not students and who are not employees are nonetheless bound by Board Policy. Thus, while the campus is not gated and is open at all times and is permeable to active transportation users (other than students and employees) including those traveling to the adjacent schools, such bicyclists are required to walk their bikes through the campus.

SMC understands that an expanded use of the campus pathways by groups such as those participating in a possible Suggested Routes to School program at either John Adams or Will Rogers would require inter-agency coordination.

In that spirit, SMC recently (April 28, 2010) wrote a letter in support of a grant application by Sustainable Streets in cooperation with the City and the Schools to integrate College campus planning with street planning with regard to bicycle, pedestrian, and transit use. SMC will also continue to work with City staff to explore other north-south routes around the Main campus.

Comment No. 4.6

There are opportunities for institutional collaboration which are not covered in the DEIR. The recent project at SAMOHI, which envisions a bike lane through the school campus, is an example for the vision to accommodate bicycle traffic through a campus site which the DEIR at hand does not present.

Response No. 4.6

See Response to Comment No. 4.5, above, regarding the adverse issues related to bicycle traffic through the SMC Main Campus. The SAMOHI campus is located approximately one mile to the west of the SMC Main Campus and is operated by the Santa Monica-Malibu Unified School District. The conditions and policies at SAMOHI High School are different from those within the campuses operated by SMC, and, as such, are not discussed within the scope of this EIR.

Comment No. 4.7

Coordinate with the City: On page 102 of the Traffic Study the DEIR recommends that SMC coordinate with the city to expand the bike route network (J-21). This is certainly a laudable recommendation. It is also a very naïve recommendation, of general application, but unaware of the specific bicycle issues at localized SMC sites. Unaware also of the historical failure of the campus to engage in precisely such a process. We know that SMC Associated Students have entered into an agreement with a local community bicycle workshop (Bikerowave) which gives SMC students free access to workshop time. We are also aware that a bicycle shaped bike rack has been installed on campus, and we appreciate the positive symbolic gesture this striking design presents. But we are not aware of substantial initiatives to benefit cyclists originating from the college administration.

Response No. 4.7

The comment refers to Mitigation Measure J-21 provided on page IV.J-82 of the Draft EIR. SMC staff has been actively coordinating with City staff regarding planning issues related to connecting the future Expo Line station at Colorado Avenue and 17th Street to the Main campus and connecting the future Expo Line Bergamot Station to the Academy campus at Stewart Street and Pennsylvania Avenue. These meetings are ongoing. College committees, such as the District Planning Advisory Council, have also met with City staff regarding planning issues for expanding the bike route network. The District and the Associated Students have implemented or have planned multiple improvements to bicycle facilities.

Comment No. 4.8

With reference to www01.smgov.net/cityclerk/council/agendas/2009/20091110/s2009111001-C-2.pdf we can note that the college has not taken an interest in the process which has culminated in the vacation of Ivy Avenue in the immediate vicinity of the main campus. Ivy Avenue would have offered a potential bicycle access route to the main campus through the idyllic surroundings of the cemetery. It connects with Pico through a decorative gate which is currently closed. The DEIR does not outline the tools which would endow the college with the vision, the expertise, and the willingness to "coordinate with the city" and intervene on behalf of cyclists when a potential bicycle route in the immediate vicinity is vacated. How then are we to imagine that SMC will improve its ability to act in the interest of those who cycle by coordinating with the city? In view of past in-action, the laudable recommendation for SMC and the City to work together for the benefit of cyclists must be revisited in order to become implementable.

Response No. 4.8

As noted in the Draft EIR, the bicycle routes are designated and maintained by the City of Santa Monica, not SMC. Mitigation Measure J-21 on page IV.J-82 of the Draft EIR recommends that SMC coordinate with the City in an effort to enhance and expand the current network of bicycle routes serving the SMC campuses. Ultimately, the City has jurisdiction over the design and operation of bicycle routes on City streets.

On December 8, 2009, the Santa Monica City Council approved vacating portions of several roadways within the Woodlawn Cemetery in order to provide additional space for internments. Specifically, the Council approved vacating existing paved roadways to the south of the Mausoleum (a portion of Rose Avenue) and to the east of the Mausoleum (a portion of Ivy Avenue). At the same time, the Council vacated several other "roadways" that exist on paper only that had already been converted to internment use and on which there are existing burial caskets and urns. One of these is the portion of Ivy Avenue from the southeast corner of the Mausoleum south to Pico Boulevard, parallel to 17th Street. As a result of these recent actions, using Ivy Avenue as a bicycle access route to SMC is not a feasible option. Furthermore, because Ivy Avenue is not under the jurisdiction of the lead agency (i.e., SMC), SMC does not have any ability to implement off-site improvements to improve bicycle access routes.

The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. The comment will be forwarded to the decision-maker for review and consideration.

Comment No. 4.9

The DEIR should therefore spell out the demand to establish the position of a full time bicycle coordinator for the campus. The DEIR should also set a commitment and timeline for the completion of a Bicycle Master Plan for the campus. In addition to Employee Transportation Coordinator, the bicycle coordinator will oversee the creation of the Bicycle Master Plan and can offer many benefits for active transportation users and help to increase their number and facilitate their commute. Furthermore, bicycle

counts and setting mode share targets for bicycle traffic should be listed among the mitigation measures for traffic impacts, and should be included in the Performance Monitoring section (J-3).

Response No. 4.9

The comment refers to Mitigation Measure J-2 provided on page IV.J-79 of the Draft EIR. The Mitigation Measure recommends the designation of an Employee Transportation Coordinator (ETC). The ETC shall be responsible for managing all aspects of the Transportation Demand Management (TDM) program, including bicycle transportation. The District does not believe that a full time position is needed to advance the many planned improvements for bicycle and pedestrian users. The comment does not provide evidence to support the assertion that a "full time bicycle coordinator" is required.

The comment also refers to Mitigation Measure J-3 provided on page IV.J-79 of the Draft EIR. The Mitigation Measure recommends the establishment of performance targets for purposes of measuring PM peak hour vehicular trip generation at the SMC campuses. The performance targets are established for purposes of managing vehicular traffic, which has been determined in the Draft EIR to cause a significantly potential impact (See Table I-1, page I-22 of the Draft EIR). This performance target is consistent with the objectives set forth in the City's Draft LUCE. The management of vehicular trip generation can be derived based on a multitude of TDM strategies as described in the Draft EIR including increased public transit usage, increased carpooling, increased walking, increased online education, increased bicycle usage, etc. It would be unnecessarily restrictive and unproductive to define a mode share target for a specific travel mode, whether it is by bicycle, walking, public transit, etc. The comment does not explain or provide evidence as to suggest why a mode share target for bicycle traffic should be required.

Comment No. 4.10

The Exposition Line is one of the most significant developments in the area of the college, and it is referenced in the Study (J 8), but not with reference to intermodal opportunities this line presents (associated bike path, opportunities for a short term bike rental to cover the distance between campus and station, etc). A similar potential exists at 26th Street and Olympic Ave.

Response No. 4.10

The Exposition Line light rail project is considered in the Draft EIR as a related project. See, for example, related projects M1 and M2 on Table III-2, page III-28 of the Draft EIR. The Draft EIR considers potential actions that can be implemented by SMC in order to enhance travel to the SMC campuses by means other than the private automobile as a result of the future Expo Line. See, for example, Mitigation Measure J-8 on page IV.J-80 of the Draft EIR which recommends shuttle transit routes connecting the Expo Line station(s) to the SMC campuses. Measures suggested in the comment, such as new bike paths and short term bike rental facilities at the stations, cannot be implemented directly by SMC (i.e., they would be implemented by the City of Santa Monica, Metro, etc.). However, such measures suggested by the comment are not necessarily precluded as they can be considered in conjunction with Mitigation Measure J-21 on page IV.J-82 which recommends that SMC coordinate with

the City to enhance and expand the current network of bicycle routes serving the SMC campuses. The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR. The comment will be forwarded to the decision-maker for review and consideration.

Comment No. 4.11

Pearl Street: The study correctly identifies Pearl Street as a Bike Lane. It is not aware of local plans to upgrade this to a bicycle priority street (Bicycle Boulevard). On street car parking configuration on Pearl is less then optimal for either bicycle facility and creates significant safety hazards. For increased safety in the area, back-in angled parking, instead of the pull-in kind, would be an ideal solution (www.pspe.org/delco/nawn.pdf). It is much safer for bicyclists — and motorists have an easier time driving out and seeing bicyclists and other moving vehicles. It also keeps headlights from shining into buildings at night. This solution has been successfully implemented in more than 70 cities, including Ventura CA, Washington DC. Seattle has more than 200 blocks of back-in angled parking. The street is excessively wide here, and other options should be explored.

Response No. 4.11

The description of the existing bicycle routes provided in the vicinity of the SMC campuses (including Pearl Street) is provided on page IV.J-18 and IV.J-19 of the Draft EIR. As noted in the Draft EIR, the bicycle routes are designated and maintained by the City of Santa Monica, not SMC. Mitigation Measure J-21 on page IV.J-82 of the Draft EIR recommends that SMC coordinate with the City in an effort to enhance and expand the current network of bicycle routes serving the SMC campuses. Ultimately, as the City has jurisdiction over the design and operation of Pearl Street, the City will determine any potential changes related to bicycle facilities, on-street parking configurations, roadway striping, etc. The comment does not state a specific concern or question regarding the adequacy of the analysis contained in the Draft EIR.

Comment No. 4.12

Terminology: On page 394 (pdf) = Page VI3 of the DEIR we find a paragraph (unable to copy) which speaks about bicycling as "alternative transportation." This terminology is found throughout the document. It devalues some of the good ideas expressed in this paragraph. Cyclists generally prefer to their mode as "active transportation" because it is more descriptive of the behavior of cyclists, who do not recognize their mode of transportation as an "alternative"

Response No. 4.12

The comment apparently refers to the statement of Project Objectives as provided in Section VI. Project Alternatives of the Draft EIR. Specifically, on page IV-3, it states: "To reorganize and better define bicycle routes and bicycle-related facilities on the Campuses. Specifically, to help promote the use of alternative transportation, increase the use of bicycle facilities and storage, and reduce the impact on traffic on adjacent streets and neighborhoods." If it is reasonably assumed that the primary means of travel to and from the SMC campuses is via the private automobile, it can be assumed that other travel

modes would be secondary or "alternative" in nature. Examples of alternative transportation include (1) public transit; (2) online delivery of instruction and services; (3) rideshare; (4) walking; and (5) bicycling. Furthermore, the use of the phrase "alternative mode of transit" when referring to bicycles does not affect the environmental analysis. The comment will be forwarded to the decision-maker for review and consideration.

Comment No. 4.13

Protected Status of DEIR files: We would like to request that the DEIR and related documents produced for public access and made available to the public in a robust and suitable manner. The document under discussion is "protected." As a consequence, even simple copy and paste commands are disabled. It also obstructs the production of partial pdf files to overcome the significant challenges of file size. Such "protection" does not serve the public and limits the ability of the public to refer to such documents in a consistent manner, forces the public, when it wants to quote language from the document, to re-type large sections. Such restrictions do not promote the process of public input, and make discussion of the issues at hand difficult.

Dr. Michael Cahn, with thanks to Barbara Filet and Alison Kendall

Response No. 4.13

Although it is not legally required, it is common practice for lead agencies to protect electronic files on environmental documents that are made available for public review over the internet. This practice ensures that the document or entire sections of the document can be printed in whole or in part, but not modified or altered by the public. As a legal document, it is important for the lead agency to protect the integrity of the production and reproduction of the EIR.

COMMENT LETTER No. 5

Comment Letter No. 5 consists of a Form Letter signed by multiple individuals. The Form Letter has been responded to in detail below. Please refer to the beginning of this section for the list of individuals that signed this Form Letter.

Comment No. 5.1

Following are our comments/questions to be addressed in the EIR, regarding the proposed replacement of the Corsair Stadium.

SMC's public notice in the Santa Monica Daily Press, dated 05/25/10, is not only too little, too late, but also misleading. The replacement of the stadium is not listed, and publishing only 10 days before the comment deadline does not provide enough time for residents to get familiar with the extensive DEIR,

and voice their concerns. We do expect more consideration from a neighbor, especially after we, Santa Monica and Malibu voters, have provided the funds for these proposed plans.

Response No. 5.1

The Notice of Availability (NOA) was published in the Santa Monica Daily Press on April 22, 2010. A separate copy of the NOA, dated April 21, 2010, was mailed to all identified state local and public agencies with jurisdiction over the Project or within the project area, as well as to those agencies, organization and/or individuals who commented on the NOP or otherwise requested to be notified. Thus, the NOA was provided in accordance with the requirements of Public Resources Code Section 21092. The subsequent Daily Press Notices were provided in addition to the initial notice as a courtesy by the Lead Agency and go beyond what is legally required under CEQA.

Comment No. 5.2

The DEIR is incomplete, besides showing studies and comparisons, it does not address the impact this enormous undertaking of demolishing and rebuilding of the stadium will have on schools and homes, in every direction, within several blocks of this location.

Response No. 5.2

The Draft EIR identifies the environmental impacts of the Proposed Project upon the surrounding neighborhood. Localized construction impacts such as air quality/dust, and noise are generally characterized with respect to distance to the nearest affected land use or sensitive receptor. Because such impacts are affected by geography and tend to attenuate or dilute over greater distances, the resulting impacts at each receptor are not quantified. Rather the worse-case concentration is identified to achieve the maximum effective mitigation strategy.

Comment No. 5.3

The following issues will have to be explained in the EIR: The EIR will have to list guarantees to assure neighbors, and parents of school children from any of the schools surrounding this location, that SMC is prepared to deal with lawsuits ensuing from health problems resulting from concrete dust created by the demolition and rebuilding of the stadium. The EIR also will have to list guarantees to homeowners/neighbors that SMC will repair structural and other potential damage created by the replacement of the stadium.

Page II-21. par 1) states that the concrete stadium structure is showing some deterioration of the concrete and does not meet current seismic standards. We do not dispute that. We are requesting, however, that the Corsair Stadium be repaired properly and retrofitted. Building Handicap access can be incorporated in this process. Relocating the ESL buildings will provide space for this adjustment. The EIR will have to show, in details, the option, and results, of repairing and retrofitting of the stadium, with inclusion of Handicap access.

Response No. 5.3

SMC has investigated the option to repair, restore and upgrade Corsair Stadium and has found this option to be infeasible from both an economic and technical basis. For one, the geotechnical upgrades required to meet seismic code safety regulations and ADA access requirements would involve a considerable amount of demolition to cut and reinforce cement foundations. In this regard, little benefit would be realized in terms of avoiding construction impacts because much of the cement would need to be jackhammered, cut and removed from the site. In addition, a planned reinforcement effort would take longer to design and implement and would extend the overall duration of the renovation or construction process. (See the Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, included as Appendix D to this Final EIR.)

Comment No. 5.4

Page II-21, par 2) states: To Provide for a central plant. A central heating and cooling system for the Main Campus would provide cost savings and energy savings;

We do not dispute this. However, you have not listed in your DEIR where, exactly, this central plant will be located.

Response No. 5.4

The location of the Central Plant is identified in Figure II-6, Main Campus - Proposed Project, on page II-12 of the Draft EIR. The Central Plant is identified and marked as item 2 on the site plan and is located adjacent to the northeast corner of Corsair Stadium site and west of the Health/Physical Education/Fitness Dance site buildings.

Comment No. 5.5

Page IV. K-1. Main Campus. par 4) The omission of Will Rogers Elementary School, as well as the Preschool on 17th Street, and the Preschool adjacent to the Church on the SW corner of Pearl and 17th Street, as well as Mount Olive Preschool, is unacceptable. Children at these schools, in addition to John Adams Middle School, will be negatively affected by concrete dust and noise. Depending on weather conditions, even Grant Elementary School, as well as the neighborhoods E and S of the college, will be affected. So will Pico Neighborhood residents.

Response No. 5.5

The nearby land uses cited in this comment are noted for the record. The Draft EIR identified 13 sensitive receptor land uses immediately surrounding the Campus. (See page IV.C-12 and IV.C-13 of the Draft EIR). The EIR found that impacts from construction emissions would be less than significant with mitigation. As such the impacts upon the sensitive receptors that were identified in the EIR would be less than significant with mitigation as well. The omission of identifying other potentially sensitive land uses

located further away than the ones noted by name in the Air Quality section of the EIR does not render the EIR inadequate or incomplete. Dispersion modeling demonstrates that construction related air emissions drop off with distance. Thus it is logical to assume that if sensitive receptors adjacent to the SMC campus would be exposed to air emissions below the significance threshold (with mitigation), then other sensitive receptors located farther away from the main Campus would be exposed to emissions that would be lower than those reported at the site.

Comment No. 5.6

The EIR will have to explain in details, the process of Asbestos testing and removal, as well as concrete dust containment during the planned demolition and rebuilding.

Response No. 5.6

As stated in Section IV.D, Hazards and Hazardous Materials, in the Draft EIR, exposure to asbestos containing materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable state and federal rules and regulations. A full copy of Rule 1403 identifying the applicable procedures and requirements for abating asbestos containing materials is included in Appendix C to this Final EIR. Compliance with Rule 1403 is a legal requirement and has also been incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the Proposed Project. Furthermore, the SMC Facilities Planning Department will require contractors to perform the necessary testing to determine the presence or absence of ACMs prior to any demolition activities.

Comment No. 5.7

Santa Monica College Career & Educational Facilities Master Plan 2010 Update Draft 4.0 Project Criteria, page 45, 4.6.2 Health/P.E/Fitness/Dance Central Plant. par 3) states: Some facilities of the Central Plant are built underground and may be located in the Corsair Field area. The Central Plant is not discussed in the following Program and Performance sections.

The EIR will have to state, very clearly, where this Central Plant will be built. What else are you planning to build under the Corsair Field, without proper notification to the public?

The EIR will have to state, in details, any other plans you have for the Corsair Field. We, and many of our neighbors, request that you choose the No Project Alternative for the Corsair Stadium. Repairing properly, retrofitting and adding Handicap Access can be done and will be less expensive.

Response No. 5.7

The location of the Central Plant is identified in Figure II-6, Main Campus - Proposed Project, on page II-12 of the Draft EIR. The Central Plant is identified and marked as item 2 on the site plan and is located

adjacent to the northeast corner of Corsair Stadium site and west of the Health/Physical Education/Fitness Dance site buildings.

Comment No. 5.8

You simply cannot justify your proposed replacement of the stadium, especially considering the current economic situation resulting in State cutbacks for Educational Institutions.

Response No. 5.8

SMC has investigated the option to repair, restore and upgrade Corsair Stadium and has found this option to be infeasible from both an economic and technical basis. For one, the geotechnical upgrades required to meet seismic code safety regulations and ADA access requirements would involve a considerable amount of demolition to cut and reinforce cement foundations. In this regard, little benefit would be realized in terms of avoiding construction impacts because much of the cement would need to be jackhammered, cut and removed from the site. In addition, a planned reinforcement effort would take longer to design and implement and would extend the overall duration of the renovation or construction process. (See the Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, included as Appendix D to this Final EIR.)

Comment No. 5.9

We look forward to work[ing] (sic) with you to achieve the necessary modernization and growth, without damage to health and safety of the surrounding neighborhoods.

Response No. 5.9

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 6

Larry Arnstein
1601 Hill Street
Santa Monica, CA 90405

Comment No. 6.1

Dear SMC,

I've lived at the corner of 16th & Hill since 1986, and just wanted you to know that we love SMC!

Seems like our local neighborhood association, (FOSP) while reasonably sane about most things, is kind of nuts when it comes to the college. As you probably know, they came out against the last bond measure, and have a long list of complaints about the plans for building, a couple of which have merit, (they think the college should repair and rebuild the stadium rather than tear it down and build a new one, a reasonable idea, and complain about the Big Blue busses on 20th St, which are too big and noisy for the street) but many of their complaints are simply bizarre.

Response 6.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment 6.2

A regular part of their complaining always includes the fact that many SMC students come from elsewhere, including quite a lot from all over the world. I've never understood why this is a bad thing. (It's a good thing, a very, very good thing!) These students come and go right past our house, and we always love to watch them coming and going.

The college has brought so much to the city and to the neighborhood. My wife and I recently joined the SMC Concert Chorate, my wife has sung in the SMC Emeritus College Lyric Chorus for many years, and she took a music class on campus, which she loved. I've used the library from time to time, we just saw a terrific production of Damn Yankees on campus, a neighbor plays with the SMC orchestra, The new Broad Center has brought world-class music to our city, and facilities like the track and swimming pool are available to the general public.

At a time when the cost of college is soaring, SMC makes it affordable to many who would otherwise not be able to afford it. It strikes me that while they are not lacking in high spirits, most of your students have a seriousness of purpose not always matched by students at way more expensive colleges and universities.

You could maybe do a better job listening patiently to the various concerns of FOSP, but please know that many residents, and I hope other members of FOSP besides myself, are supportive of the college.

Response No. 6.2

This comment does not challenge the adequacy of the Draft EIR and no further response is required. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 7

Tom Charchut
2010 Navy Street
Santa Monica, CA 90405

Comment No. 7.1

Dear Mr. Lawson,

I would begin by echoing on a personal level the detailed and thoughtful comments on the College's EIR submitted by the FOSP Board. Based on my limited personal experience, I have generally been amazed at the insensitivity of the College to the inconveniences (to put it mildly) caused to its neighbors by the ambitious building projects at the College. Increased traffic and congestion are their consistent byproducts, whatever their perceived benefit to the College. The question may properly be asked -- whose interests does the College serve? Based on the College's conduct over the years, the interest served certainly is not that of the citizens of Santa Monica -- rather it is the interest of the College in becoming a mega institution to serve the universe at Santa Monica's expense.

Response No. 7.1

This comment does not challenge the adequacy of the Draft EIR and no further response is required. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 7.2

The limited availability of this EIR is just another example of the College's insensitivity to its neighbors. How can there be fair comment when getting access to the relevant materials is so difficult and inconvenient? And, even if one were miraculously successful in getting a copy, it appears that the EIR is incomplete and lacking in many significant details. Seeking fair comment requires that the College be fair in providing sufficient access to a full and complete presentation of the issues under consideration. Anything less amounts to mere lip service and is completely unfair to Santa Monica residents. This EIR should be sent back for substantial revision and, when ready, opportunity for comment must include fair and reasonable access.

Thank you for taking the time to read these comments and I sincerely hope they will be given reasonable consideration.

Response No. 7.2

The distribution and availability of the EIR was conduced in accordance with the CEQA Guidelines. As stated in the NOA a complete electronic copy of the Draft EIR on the colleges website at www.smc.edu/facilities_masterplan and printed copies of the EIR were available for the public to review at the Administration Building at 1900 Pico Boulevard. The college received no requests for copies of the

Draft EIR from any of the local schools or community groups noted above. As noted in this comment, copies of the EIR were distributed to the Friends of Sunset Park and others who requested copies.

COMMENT LETTER No. 8

C. Dickinson
texart68@verizon.net

Comment No. 8.1

Dear Mr. Lawson,

We have been living here two blocks from SMC since 1982.

As you may imagine what we all have to endure with the dust, traffic and noise from SMC years after years. Now we have learned that the college is going to expand during one of the worse economic turmoil, and why? And if necessary, why not building away from the residential neighborhood? What would be the environmental impact for a bigger scale of SMC on this small residential neighborhood?

Response No. 8.1

This comment does not challenge the adequacy of the Draft EIR and no further response is required. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 8.2

I like to post some more important questions.

1) how much does this cost and how could SMC stick to the budget?

Response No. 8.2

The funding source for the Proposed Project was disclosed in the Draft EIR. As stated on page II-10 of the Draft EIR, the Proposed Project provides for the orderly implementation of capital improvement projects as identified in Measure AA, a local bond measure approved by the voters of the District in November 2008. The specific improvements planned under the Proposed Project would be fully funded under the existing Measure AA and not dependent upon future initiatives.

The exact funding of the Project and for individual projects identified within the EIR are not a CEQA issue and are not relevant to the environmental analysis contained within the EIR. Nevertheless, this comment will be forwarded to the decision makers.

Comment No. 8.3

2) how are the heavy traffic get to the site, the Blue Bus, the students' cars, and the construction trucks? Note: Pearl Street and the neighboring streets are not designed nor built to be sustain heavy traffic.

Response No. 8.3

The main haul route to and from the Main Campus would be from the 10 Freeway to Pico Boulevard. Trucks would access the site from either Pico Boulevard or 16th Street, or Pearl Street. However, haul trucks would not traverse Pearl Street other than to access the site and depart on a northbound route to Pico Boulevard. 20th Street would not be used as a haul route or for construction delivery trips.

Comment No. 8.4

3) how many more students are to fill the school and what impact of more traffic, and more noise to our neighborhood?

Response No. 8.4

A detailed chart showing SMC's enrollment history from 2005 to 2010 is provided in Table III-7, in Response to Comment 3.15, above. As shown in Table III-7, SMC's on-ground student enrollment has remained relatively constant averaging 27,010 students for the 6-year period. In 2005, the on-ground enrollment was 26,747 students and in 2010, the on-ground enrollment was 27,163 students, an increase of 416 students over the 6-year period. During this same period, SMC's online student enrollment has more than doubled, from 3,024 students in 2005 to 7,125 students in 2010. In total, in 2005 SMC had a headcount of 29,711 students and in 2010 a headcount of 34,288 students. The average total headcount over the 6-year history from 2005 to 2010 is 32,298 students. This historic enrollment data suggests an annual growth rate in total enrollment of approximately 2.8% per year. However, it is important to note that SMC's online enrollment has increased at a higher pace than the total enrollment growth rate. The 6-year historic attendance for online classes has increased from 3,024 students in 2005 to 7,125 students in 2010. This represents an approximate 19% annual growth rate for online courses.

Within Section IV.J, Transportation, Traffic and Parking, the methodology for deriving the traffic generation forecast for the Proposed Project is provided beginning on page IV.J-49. As noted in the section, the basis for estimating increased traffic due to the Proposed Project during the weekday AM and PM peak hours is the increase in building floor area proposed at the SMC campuses. The building floor area is considered a reliable independent variable in terms of estimating peak hour trip generation as it directly affects the number of people (students, faculty, other staff, visitors, etc.) that can be accommodated on-site. Thus, any changes in the building floor due to the Proposed Project would directly affect the relative trip generation potential at the SMC campuses during peak periods. By comparison, student enrollment is not considered to be a suitable independent variable as changes in student enrollment can occur without affecting peak hour traffic generation. For example, additional students can be accommodated in classes that do not require travel during peak hours (e.g., classes during

midday hours). Additionally, the enrollment of additional students for online education would not add traffic at the SMC campuses.

The reader is referred to Section IV.G of the Draft EIR, for a full discussion of the Noise/Vibration impacts associated with the Proposed Project. As shown in Section IV.G., the Proposed Project would not result in any new significant noise impacts from mobile noise sources such as automobile traffic.

Comment No. 8.5

4) how high are the buildings and how would that change the look of our neighborhood?

Response No. 8.5

The height of the proposed buildings is disclosed in Section II, Project Description of the Draft EIR. (See page II-19 of the Draft EIR). An analysis of the scale and massing of the proposed heights and how it would affect the local neighborhoods is presented in Section IV.A, Aesthetics of the Draft EIR.

Comment No. 8.6

5) how is the grand scheme going to improve our present quality of life?

Response No. 8.6

SMC's Project Objectives are identified on page II-20 of the Draft EIR. The Proposed Project entails the construction and modernization of new facilities for Santa Monica College.

Comment No. 8.7

6) how long does it take to complete the work?

I hope the college will consider us as neighbors and when every student and member of the faculty leaves at the end of their day we still live here.

Response No. 8.7

Construction and buildout of the proposed physical improvements is anticipated to occur by 2020 (an approximate 10-year buildout horizon). Table II-5 in Section II, Project Description of the Draft EIR depicts the anticipated construction timeline for buildout of the project. Construction on the Main Campus would occur over an approximate 5-year period beginning in the third quarter of 2010 and ending in the third quarter of 2015. Construction on the Performing Arts Campus would occur over an approximate 1-year period between the third quarter of 2011 and the second quarter of 2012. Construction on the AET Campus is scheduled to occur over an approximate 3-year period starting in the third quarter of 2010 and ending in the second quarter of 2013.

COMMENT LETTER No. 9

James F. Dubois
1502 Grant Street
Santa Monica, CA 90049

Comment No. 9.1

I would like to request that you choose the No Project Alternative for the Corsair Stadium.

Repairing and properly retrofitting can be done and will be less expensive.

Considering the current economic conditions, as well as the neighborhood impact, try another solution.

Response No. 9.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration. It should be further noted that SMC has investigated the option to repair, restore and upgrade Corsair Stadium and have found this option to be infeasible from both an economic and technical basis. For one, the geotechnical upgrades required to meet seismic code safety regulations and ADA access requirements would involve a considerable amount of demolition to cut and reinforce cement foundations. In this regard, little benefit would be realized in terms of avoiding construction impacts because much of the cement would need to be jackhammered, cut and removed from the site. In addition, a planned reinforcement effort would take longer to design and implement and would extent the overall duration of the renovation or construction process. (See the Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, included as Appendix D to this Final EIR.)

COMMENT LETTER No. 10

Thomas Elias
1720 Oak Street
Santa Monica, CA 90405

Comment No. 10.1

Dear Mr. Lawson -- Is there a substantial reason for rebuilding the stands at Corsair Field, when they are already equivalent in size and quality to those at the vast majority of other community colleges? If so, that reason should be plainly stated to the community, along with SMC's plans for uses of Corsair Field beyond today's. This lack of information, plus the lack of detail on environmental effects for the surrounding residents, schools and pre-schools, renders your current Draft EIR unacceptable. Is the

college prepared to fund defense of lawsuits demanding such changes and additions to the EIR, in addition to plaintiffs' fees when the courts find in their favor? If not, it's time to take this ill-advised plan back to the drawing board.

Response No. 10.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 11

Abby Hellwarth
Sunset Park Resident
ahellwarth@roadrunner.com

Comment No. 11.1

Dear Mr. Lawson:

I am very disappointed at the way SMC handles its Bond money. The proposal to tear down Corsair Stadium seems totally unnecessary and dangerous to the environment of the residents, the employees and the school children in the area.

Instead of always asking for funds through Bond Measures, it is time for SMC to act like an educational institution which demonstrates to the students and the public that it is capable of using resources responsibly.

Please make the draft of the plan more accessible to the public and listen carefully to our comments.

Response No. 11.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 12

Doug Levitt
1720 Cedar Street
Santa Monica, CA 90405

Comment No. 12.1

Dear Dr. Tsang,

I write as an appreciator of the great service that Santa Monica College provides the community at-large. I also write as someone who enjoys the diversity and increasing beauty of the campus, only a block and a half from our front door on Cedar Street between 17th and 18th.

Therefore, I hope it's with great appreciation for the college's impact on us (both positive and negative) that the following is read. My wife and I share extraordinary concern with respect to the university's Draft EIR of the SMC Facilities Master Plan (2010 Update), which appears to have obfuscated the impact on the community, both through incomplete information, lack of dissemination and transparancy.

Response No. 12.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

Comment No. 12.2

We are particularly concerned about any notion of demolishing the concrete Corsair Stadium, which can be retrofitted to meet all standards. This will be a terrible disservice to the community that serves as a home and funder of Santa Monica College, with its now 32,000+ attendance, including 5,000 from beyond the state. The number, I ought add, is just another discrepancy between actuality and a plan that sees expansion as its primary goal at all -- and all others' -- costs.

In closing, I do want to repeat my sincere appreciation for all you do to help educate our communities.

I would be grateful for a response to this letter.

Response No. 12.2

SMC has investigated the option to repair, restore and upgrade Corsair Stadium and have found this option to be infeasible from both an economic and technical basis. For one, the geotechnical upgrades required to meet seismic code safety regulations and ADA access requirements would involve a considerable amount of demolition to cut and reinforce cement foundations. In this regard, little benefit would be realized in terms of avoiding construction impacts because much of the cement would need to be jackhammered, cut and removed from the site. In addition, a planned reinforcement effort would take longer to design and implement and would extent the overall duration of the renovation or construction

process. (See the Corsair Field Stadium Seismic Evaluation Study, prepared by John A. Martin & Associates, Draft dated October 15, 2006, included as Appendix D to this Final EIR.)

COMMENT LETTER No. 13

Jeanne Payne
1703 Pine Street
Santa Monica, CA 90405
jandjpayne.jp@verizon.net

Comment No. 13.1

As usual, SMC is up to no good, completely oblivious to the neighborhood around it. And as usual, SMC is being sneaky about it, trying to get by by not addressing the issues honestly and in a forthcoming manner.

They always make it very clear that they "march to a different drummer" and don't give a hoot about the neighbors!

Their greed is famous!

Response No. 13.2

This comment does not raise any specific objection or challenge to the adequacy of the environmental analyses in the EIR. No response is required. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 14

John Reynolds
Sunset Park
johnreynolds@kavichreynolds.com

Comment No. 14.1

Dear Mr. Lawson,

I'm fairly certain that academically you are making a significant contributions to the lives of your students and for that I thank you. I live on 17th street and witness the impact SMC has on the community in another way. The added traffic, pollution, litter, parking and noise are what I see, smell and hear on a daily basis.

When I heard you were going to be undertaking a massive campus expansion project, including the demolition of Corsair Stadium, I sighed in resignation knowing the college would just power it through and not reach out to those of us in the neighborhood that are most impacted by this endeavor. I am opposed to this expansion, mostly because I don't know what purpose it serves. I request that you make a meaningful attempt to educate and listen to the community in which you serve. If we, your neighbors, were more informed about your plans we might just be enrolled in what you are setting out to achieve but with the lack of transparency and arrogant approach you take with regard to the EIR and outreach I will remain a staunch opponent to this and any future campus expansion.

Response No. 14.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 15

Susan Salem
susanksalem@gmail.com

Comment No. 15.1

I want to thank SMC for your partnership with Santa Monica High School, especially for having the Varsity football games at Corsair stadium on Friday nights. I have tried to review the plan online, but the length makes it rather difficult. I am concerned that you are planning to demolish Corsair stadium and I cannot find a timeline for when and if you have considered the impact on the Santa Monica High School's football team. Perhaps you have been working with someone at Samohi. As you may or may not know, the Athletic Director, Norm Lacy passed away suddenly last week. As a parent of a high school student, I wanted to express my concerns.

Response No. 15.1

Corsair Stadium is a community recreation resource for many in the area and its planned demolition and reconstruction would be a temporary disruption in service to the community. A coordinated plan will be developed in consultation with users to minimize any disruption in service to those programs and institutions that utilize Corsair Stadium.

COMMENT LETTER No. 16

Robert W. Konecki
rkonecki@hotmail.com

Comment No. 16.1

Dear Randal Lawson VP:

We have been here in SM for now over 42 years and have seen this College go from a Community college to now what has become a University size Campus, and is still growing according to the new plans.

With the parking problems down 16th and other neighborhood streets, which are at least a mile away from the school and the new Parking structure, this school is becoming too large.

You now also have small campuses all over SM at the Airport, North of town etc.

You do not need to be all things to all students Internationally etc or those students coming from LA, or other areas, etc. SMC is starting to be a burden on the City and the local community residents.

Enough building already!! Repair what you have!!

Response No. 16.1

With regard to opinions regarding the growth of SMC, this comment will be forwarded to the decision makers for their consideration.

With regard to the comments pertaining to parking on 16th Street, the analysis of parking at SMC is provided in the Draft EIR beginning on page IV.J-72. As detailed in the section, the parking analysis included the existing street parking on 16th Street near the Main Campus. In the future with build-out of the Master Plan, the Draft EIR forecasts that the Main Campus will yield a surplus of approximately 529 parking spaces during peak periods (approximately 84% utilization of the proposed supply). Thus, adequate parking is expected to be provided at the Main Campus following build-out of the Project. The implementation of the recommended Mitigation Measures J-1 through J-21 outlined in the Draft EIR should further reduce parking demand at the SMC campuses.

COMMENT LETTER No. 17

Michael T. Tanouye
20 Village Park Way
Santa Monica, CA 90405

Comment No. 17.1

As a homeowner in the Sunset Park area of Santa Monica, I wish to register my opposition to the proposed plan. My reasons are as follows:

1. The facilities listed in the plan seem to be in satisfactory structural and operational condition.

Response No. 17.1

This comment does not raise any specific objection or challenge to the adequacy of the environmental analyses in the EIR. The comment will be forwarded to the decision makers for their consideration. With respect to the purpose and need for the Proposed Project, the Project Objectives are identified on page II-20 of the Draft EIR. The proposed Master Plan 2010 Update incorporates current College facility planning, including Board-approved 5-year capital outlay plans; facility assessment surveys conducted in 2001, 2002, and 2003; projects submitted for State funding; and projects approved by the voters of Santa Monica and Malibu in the bond measure elections of 2002, 2004, and 2008 (Measures U, S, and AA).

Many of the facilities on the Main Campus are deteriorating and in need of substantial capital improvement.

The math department operates in a temporary facility that is nearing the end of its life cycle. The current facility lacks the infrastructure to support modern classroom technology. The Earth, Life, and Physical Sciences programs are operating in spaces that are too small and scattered around the campus. This inhibits the sharing of resources and incurs expensive replacement costs for laboratory teaching materials. There are insufficient science lab classrooms to offer needed course sections for the Allied Health and Nursing Program. The new building would restore to the Main Campus an instructional observatory and would provide a replacement planetarium to meet the increasing demands for course offerings and community educational programs.

The physical education department is currently operating in a 1958 building in which many of the systems are in poor condition, including the roof, the concrete floors, the restrooms, showers, exhaust systems, and electrical systems. The fire systems are not centrally monitored and the building lacks a fire sprinkler system. A replacement building would provide additional indoor physical education and fitness training, would provide equal support facilities for men and women, would provide needed facilities for the dance program, and would be available to the community during non-instructional times;

Corsair Stadium, built in 1948, is a concrete stadium structure that is showing some deterioration of the

concrete and does not meet current seismic standards. The ESL program operates in temporary buildings that are nearing the end of their life cycle.

Comment No. 17.2

2. Demolition and rebuilding of Corsair Stadium would have a tremendous disruptive and polluting effect on the neighborhood.

Response 17.2

The environmental effects of demolishing and rebuilding Corsair Stadium are identified in the Draft EIR. As noted in the EIR, with implementation of all applicable rules and regulations and mitigation measures to reduce the project's impact associated with the planned demolition of Corsair Stadium, no significant health or safety impacts are anticipated to result. Since no specific effect is identified or challenged, no further response is required.

Comment No. 17.3

3. Even if the new facilities are outfitted with so-called "green" features, the demolition and hauling of current facilities, the extraction, processing and transport of materials for the new facilities would create a carbon footprint so large that small incremental reductions after construction would not come close to compensating for the pre-construction footprint.

Response No. 17.3

The impacts of these emissions generated by the Proposed Project during its construction and operation have been examined. A complete greenhouse gas emission inventory has been calculated and is presented in Section IV.C, Air Quality (see Table IV.C-12 on page IV.C-31). In addition, the Draft EIR provides a comprehensive analysis with the Proposed Project's compliance and consistency with the 2006 CAT Report Strategies and Project Consistency with ARB Scoping Plan Recommended GHG Emission Reduction Measures, respectively. See Section IV.C, Air Quality of the Draft EIR.

Comment No. 17.4

I encourage you to leave well enough alone and help Santa Monica College live up to its stated desire to be an environmentally progressive institution.

Response No. 17.4

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

IV. MITIGATION MONITORING PROGRAM

INTRODUCTION

This section reflects the mitigation monitoring and reporting program (MMRP) requirements of Public Resources Code Section 21081.6. CEQA Guidelines Section 15097 states:

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

ENFORCEMENT

In accordance with CEQA, the primary responsibility for making a determination with respect to potential environmental effects rests with the lead agency rather than the Monitor or preparer of the EIR. As such, the Santa Monica Community College District (SMC) is identified as the enforcement agency for this Mitigation Monitoring and Reporting Program.

PROGRAM MODIFICATION

After review and approval by the lead agency, minor changes to the MMRP are permitted but can only be made by SMC. No deviations from this program shall be permitted unless the MMRP continues to satisfy the requirements of Section 21081.6 of the California Environmental Quality Act (CEQA), as determined by the Lead Agency.

MITIGATION MONITORING AND REPORTING PROGRAM

The organization of the MMRP follows the subsection formatting style as presented within the SMC Career and Educational Facilities Master Plan (2010 Update) Draft EIR. Subsections of all of the environmental chapters presented in the Draft EIR are provided below in Table IV-1. For environmental issue areas where no mitigation measures were required, the MMRP is noted accordingly.

Table IV-1
Mitigation Monitoring Program

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
IV.B Aesthetics						
(B-1) A Campus Lighting Plan shall be developed to ensure that lighting provided throughout the SMC Campus system minimizes the extent of spillover onto adjacent properties.	• Plan approval.	• Pre-construction.	SMC			
(B-2) All new structures shall be constructed of glare-reducing materials that minimize glare impacts on motorists and other persons on and offsite.	• Plan approval & field check.	• Pre-construction & construction.	SMC			
IV.C Air Quality						
(C-1) The project applicant shall require, by contract specifications, that architectural coatings used at the Proposed Project contain no more than 100 grams of VOC per liter.	• Plan approval.	• Pre-construction.	SMC			
IV.D Hazards and Hazardous Materials						
(D-1) Prior to the issuance of a demolition permit, a letter shall be obtained by the SMC Office of Facilities Planning from a qualified asbestos abatement and lead-based paint consultant stating that no ACMs or LBP are present in the structures. If ACMs or LBPs are found to be present, such materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable state and federal rules and regulations.	• Asbestos/Lead removal.	• Pre-construction.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
(D-2) If contaminated soils are encountered during Project construction, the District shall prepare and implement a Soil Management Plan (SMP), as required by the Division of the State Architect and in accordance with an approved Memorandum of Agreement between the Applicant and the RWQCB.	• Field check to confirm measures are implemented.	• Construction.	SMC			
(D-3) Prior to commencement of construction at either site, the soils beneath all proposed structures at the AET and Olympic Shuttle lot, respectively, shall be independently analyzed by a qualified engineer, who shall investigate and record detectable methane levels and recommend appropriate measures to prevent or retard potential methane gas seepage into the proposed buildings. If warranted, all commercial, industrial, and institutional buildings shall be constructed with an approved Methane Control System, with a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.	• Plan approval.	• Pre-construction.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
IV.E Hydrology and Water Quality						
The Proposed Project would be required to comply with federal, state, and municipal regulations concerning stormwater quantity and quality, including relevant requirements under the NPDES permits for construction sites and municipal storm drain systems. No project specific mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
IV.F Land Use and Planning						
No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
IV.G Noise/Vibration						
(G-1) Pursuant to Section 4.12.110 of the 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.	• Field check to confirm measures are implemented.	• Construction.	SMC			
(G-2) Pursuant to Section 4.12.110 (d), any construction activities that exceed an 80 dBA equivalent noise level shall occur between the hours of ten a.m. and three p.m., Monday through Friday.	• Field check to confirm measures are implemented.	• Construction.	SMC			
(G-3) Prior to construction, the contractor shall submit a list of equipment and activities required during construction to the SMC Office of Facilities Planning.	• Plan approval.	• Pre-construction.	SMC			
(G-4) All construction equipment shall be in proper operating condition and fitted with standard factory noise attenuation features.	• Field check to confirm measures are implemented.	• Construction.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
(G-5) Sound blankets shall be used on all construction equipment where technically feasible.	• Field check to confirm measures are implemented.	• Construction.	SMC			
(G-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.	• Field check to confirm measures are implemented.	• Construction.	SMC			
(G-7) Stockpiling and vehicle staging areas shall be located away from occupied dwellings and other sensitive receptors to the extent feasible.	• Field check to confirm measures are implemented.	• Construction.	SMC			
(G-8) Mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot unless it can be shown that the noise will comply with the requirements of Section 4.12.060. Roof locations may be used when the mechanical equipment is installed within a noise attenuating structure.	• Plan approval	• Pre-construction.	SMC			
IV.H Public Utilities (Wastewater, Water, Energy Resources)						
No mitigation measures are required. However, the SMC Facilities Master Plan will incorporate a variety of project design features intended to minimize the SMC Campus' demand for public utilities.	N/A	N/A	N/A	N/A	N/A	N/A
IV.I Public Services (Police, Fire)						
No mitigation measures are required for police services. However, the Proposed Project will incorporate a variety of project design features intended to minimize the SMC Campus' need for police services. Specifically, SMC and SMCPD will prepare and implement a security plan addressing policies for crime prevention.	N/A	N/A	N/A	N/A	N/A	N/A

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
(I-1) The following fire safety measures shall be incorporated into the building plans and shall be submitted to the Fire Department for approval prior to the approval by the Division of the State Architect. The plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant.	• Plan approval.	• Pre-construction.	SMC			
IV.J Transportation and Traffic						
(J-1) *Transportation Demand Management Association*. As part of the LUCE Update process, the City of Santa Monica has identified that a Transportation Demand Management Association (TMA) should be established for the SMC Main Campus. Santa Monica College shall participate in the establishment of a geographic-based TMA for its Main Campus by providing information and sending representatives to the TMA meetings if such a TMA is organized by the City of Santa Monica. If and when formed, the TMA is expected to provide faculty/staff, students, and visitors with resources to increase the amount of trips taken by transit, walking, bicycling, and ridesharing. This mitigation measure does not commit SMC to funding such resources.	• Coordinate with the City of Santa Monica on TMA.	• Post-construction (Operation).	SMC			
(J-2) *Employee Transportation Coordinator*. An Employee Transportation	• Designate an ETC.	• Post-construction (Operation).	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
Coordinator (ETC) shall be designated for SMC. The ETC shall manage all aspects of this TDM program and participate in City-sponsored workshops and information roundtables. While the Project encompasses multiple sites, the ETC shall be responsible for TDM activities at all campuses.						
(J-3) *Performance Monitoring and Targets*. SMC shall seek to ensure that cumulative vehicular trip generation for the Proposed Project does not exceed current levels at the Main Campus, AET Campus, Olympic Shuttle Lot Campus, and PAC Campus. Consistent with the objectives of the City's Draft LUCE, trip generation shall be monitored during the weekday PM peak hour. SMC shall contract with a licensed traffic engineer to monitor compliance with the PM peak hour trip reduction target. A baseline PM peak hour trip generation target shall be established following completion and occupancy of the new Student Services Building by counting traffic at the driveways serving the Main Campus, AET Campus, Olympic Shuttle Lot Campus and PAC Campus. The baseline target shall be determined by summing the trip generation counted at each campus during one common hour (e.g., 5:00 – 6:00 PM). Thereafter, once every two years, beginning in the first full school year following the occupancy of the first building greater than 20,000	• Conduct weekday PM peak hour monitoring counts at the SMC campus driveways.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
ASF constructed under this Master Plan, the traffic engineer shall conduct weekday PM peak hour monitoring counts at the SMC campus driveways and prepare a report on compliance for SMC's Board of Trustees. The traffic monitoring should generally be conducted on a mid-weekday (Tuesday, Wednesday or Thursday) in the middle of the Fall semester (e.g., October) corresponding with the methodology used in establishing the baseline. In the event that the target is not reached in a two year period, SMC shall make modifications to the TDM conditions to more effectively achieve, through reasonable and feasible measures that will not substantially increase the cost of mitigation, the performance target herein. Should the PM peak hour trip generation target be reached in two successive reporting periods (i.e., over four years total), no additional monitoring shall be required. In no event shall the monitoring conclude prior to year 2017 (the anticipated build-out of the Master Plan).						
(J-4) *Transportation Information Centers.* SMC shall provide on-site information at its Main Campus for employees, students, and visitors about local public transit services (including bus lines, future light rail lines, bus fare programs, rideshare programs and shuttles) and bicycle facilities (including routes, rental	• Provide Transportation Information Centers.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
and sales locations, on-site bicycle racks and showers [at the Main Campus only in the Physical Education building]). SMC shall also provide walking and biking maps for employees, visitors and residents, which shall include but not be limited to information about convenient local services and restaurants within walking distance of the SMC campuses. SMC shall provide information to students and employees of the campuses regarding local rental housing agencies. Such transportation information may be provided through a computer terminal with access to the Internet, as well as through the office of the ETC located at the SMC Main Campus. Transportation information may also be maintained at the administrative offices of the SMC satellite campuses, or by directing inquiries to the Main Campus or SMC web site.						
(J-5) *TDM Web Site Information*. SMC shall be required to provide transportation information in a highly visible and accessible location on the school's web site, including links to local transit providers, area walking, bicycling maps, etc., to inform employees, students and visitors of available alternative transportation modes to access the campuses and travel in the area. The web site should highlight the environmental benefits of utilization of alternative transportation modes.	• Provide TDM Web Site Information.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
(J-6) *TDM Promotional Material.* SMC shall be required to provide and exhibit in public places information materials on options for alternative transportation modes and opportunities. In addition, transit fare media and day/month passes will be made available to employees, students and visitors during typical business hours.	• Provide public information on TDM.	• Operation	SMC			
(J-7) *Transit Welcome Package*. SMC shall provide all new students and employees of the college with a Transit Welcome Package (TWP). The TWP at a minimum will include information regarding SMC's arrangement for free or discounted use of the Big Blue Bus, area bus/rail transit route information, bicycle facilities (including routes, rental and sales locations, on-site bicycle racks, walking and biking maps), and convenient local services and restaurants within walking distance of the SMC campuses.	• Provide TWP to all new students and employees.	• Operation.	SMC			
(J-8) *Expanded SMC Inter-Campus Shuttle*. The existing SMC inter-campus shuttle shall be expanded to connect all SMC campuses, including the subject Main Campus, AET Campus, Olympic Shuttle Lot and PAC Campus. Additionally, the SMC Shuttle System route alignments and schedules shall be expanded in the future to connect with planned Metro Exposition Corridor Transit Project Phase 2 stations located within the City of Santa Monica (i.e., 26th	• Expand Shuttles.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
Street/Olympic Boulevard Station, 17th Street/Colorado Boulevard Station and 4th Street/Colorado Boulevard Station). Such shuttle services can be provided by vehicles operated by SMC, or through agreement with a public transit agency such as the Santa Monica BBB. Such expanded shuttle service shall be free or discounted to students and employees of SMC.						
(J-9) *Internet-Based/Independent Study Education*. SMC shall continue to expand its offering of internet-based and independent study classes which allows for a portion or all of the education activities to occur without students and faculty needing to be physically on-site at an SMC facility.	• Expand internet-based and independent study classes.	• Operation.	SMC			
(J-10) *Public Transit Passes*. To the extent feasible, SMC will continue to offer free public transit coordination with the Santa Monica BBB for all students and staff. To the extent feasible, SMC will seek to expand this benefit to other transit providers (i.e., Metro). Should the program whereby students and staff are able to use their SMC identification card for free transit be discontinued or unavailable, SMC will work with the transit agencies to make available the purchase of a transit pass at a highly discounted rate (e.g., 50 percent).	• Provide free or discounted public transit for students and staff, to the extent feasible.	• Operation.	SMC			
(J-11) *Employee Pay for Parking Program*. SMC shall continue to require that employees pay for their own parking.	• Parking fee enforcement.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
				Initial	Date	Comments
(J-12) *Carpool Program for Employees*. SMC shall provide preferential parking within the parking garage for SMC employees who commute to work in employer registered carpools. An employee who drives to work with at least one other employee to the SMC campuses may register as a carpool entitled to preferential parking within the meaning of this provision.	• Provide preferential parking within the parking garage for SMC employees who commute to work in employer registered carpools.	• Operation.	SMC			
(J-13) *Public Transit Stop Enhancements.* Working in cooperation with other transit agencies and the City of Santa Monica, SMC shall seek to improve existing bus stops with shelters and transit information within the immediate vicinity of the SMC campuses. Enhancements could include weather protection, lighting, benches, telephones, and trash receptacles. These improvements would be intended to make riding the bus a safer and more attractive alternative. This mitigation measure does not commit SMC to fund any particular improvements.	• Coordinate with the City on bus stop enhancements.	• Operation.	SMC			
(J-14) *Convenient Parking for Bicycle Riders*. SMC shall provide locations at all four campuses for convenient parking for bicycle commuters for employees working at the sites, students attending classes at the sites, and visitors to the sites. The bicycle parking will be located within the SMC campuses and/or in the public right-of-way adjacent to the commercial uses such that long-term and	• Provide bicycle parking. • Observe utilization to determine if more bicycle parking is necessary.	• Construction & operation.	SMC			

Mitigation Measure/Condition of Approval		Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
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	short-term parkers can be accommodated. For purposes of this requirement, bicycle parking may mean bicycle racks, a locked cage, or other similar parking area. SMC shall observe utilization of the bicycle parking at the Main Campus and satellite campuses each semester and, if necessary, make arrangements for additional bicycle parking if the demand for bicycle parking spaces exceeds the supply.						
(J-15)	*Compressed Work Week Schedule*. When feasible, a Compressed Work Week schedule shall be offered to employees whereby their hours of employment may be scheduled in a manner which reduces trips to/from the worksite during peak hours for the surrounding streets.	• SMC scheduling.	• Operation.	SMC			
(J-16)	*Flex-Time Schedule*. When feasible, SMC shall permit its employees within the Project to adjust their work hours in order to accommodate public transit schedules, rideshare arrangements, or off-peak hour commuting.	• SMC scheduling.	• Operation.	SMC			
(J-17)	*Guaranteed Return Trip for Employees*. SMC shall provide vanpool and carpool reliant employees with a free return trip (or to the point of commute origin), when a personal emergency situation requires it.	• Provide return trips.	• Operation.	SMC			
(J-18)	*Student Parking Pricing*. SMC shall continue to require that students pay for their own parking.	• Parking fee enforcement.	• Operation.	SMC			
(J-19)	*Student Hiring Policies*. To the extent feasible, SMC shall provide preferential	• Implement hiring policies.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
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consideration to hiring current SMC students for part-time employment based on satisfaction of other requirements of the available positions.						
(J-20) *Local Hiring Program*. To the extent feasible, when hiring SMC shall conduct outreach to residents who live within one mile of the SMC campus (or other facility to where the position of employment is offered), based on satisfaction of other requirements of the available positions.	• Implement hiring policies.	• Operation.	SMC			
(J-21) *Expanded Bicycle Routes*. SMC shall coordinate with the City of Santa Monica in an effort to enhance and expand the current network of bicycle routes serving the SMC campuses.	• Coordinate with City on expanding bicycle routes.	• Operation.	SMC			
(J-22) To the extent feasible, SMC shall continue its program with the Santa Monica Big Blue Bus to provide free public transit services to all SMC students and staff. If this is not feasible or practical, SMC shall work with Santa Monica Big Blue Bus to offer reduced rate transportation to SMC students and staff.	• Coordinate with Big Blue Bus programs.	• Operation.	SMC			
(J-23) To the extent feasible, SMC shall work with other public transit providers (e.g., Metro) to offer free public transit services to all SMC students and staff. If this is not feasible or practical, SMC shall work with the public transit providers to offer reduced rate transportation to SMC students and staff.	• Coordinate with public transit providers.	• Operation.	SMC			

Mitigation Measure/Condition of Approval	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
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(J-24) SMC shall seek to expand shuttle connections (either through SMC-operated vehicles and/or in coordination with the Santa Monica Big Blue Bus) between campuses, including future connections to the Expo Light Rail Line stations in Santa Monica.	• Expand shuttle connections.	• Operation.	SMC			
(J-25) SMC shall work with the City of Santa Monica, Santa Monica Big Blue Bus and Metro to enhance the Pico Boulevard transit plaza including providing expanded sidewalk areas, shelters, lighting, and other passenger enhancement and safety features for both eastbound and westbound transit vehicles.	• Coordinate with City and Big Blue Bus.	• Operation.	SMC			
IV.K Neighborhood Effects						
Where mitigation measures have been identified to reduce the Master Plan's potentially significant environmental impacts, they are identified by reference herein and presented in detail in each respective section of the Draft EIR.	N/A	N/A	N/A	N/A	N/A	N/A
IV.L Geology/Soils						
(L-1) The Proposed Project shall be designed and constructed in accordance with the recommendations provided in the Project's Final Geotechnical Report for each Project Site, which shall be reviewed by the Division of the State Architect prior to construction.	• Plan approval & field check.	• Pre-construction & Construction.	SMC			

Source: Christopher A. Joseph & Associates, July 2010.