

SANTA MONICA COLLEGE 2024 MAIN CAMPUS MASTER PLAN UPDATE FINAL ENVIRONMENTAL IMPACT REPORT



Prepared for:

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

Prepared by:

Parker Environmental Consultants
25350 Magic Mountain Parkway, Suite 300
Valencia CA 91355



October 2025
State Clearinghouse No. 2025010279

This Page Intentionally Left Blank

TABLE OF CONTENTS

I.	INTRODUCTION	I-1
A.	Purpose and Use of the Final EIR.....	I-1
B.	Organization of the Final EIR	I-2
II.	EXECUTIVE SUMMARY	II-1
A.	Project Overview	II-1
B.	Project Objectives	II-2
C.	Public Review Process.....	II-7
D.	Areas of Concern	II-7
E.	Significant and Unavoidable Environmental Impacts	II-7
F.	Overview of Selected Alternatives	II-7
G.	Summary of Environmental Impacts	II-8
III.	RESPONSES TO COMMENTS ON THE DRAFT EIR	III-1
A.	Comment Letters.....	III-1
IV.	ADDITIONS TO THE DRAFT EIR	IV-1
A.	Introduction.....	IV-1
B.	Additions.....	IV-1
V.	MITIGATION MONITORING PROGRAM.....	V-1
A.	Introduction.....	V-1
B.	Organization	V-2
C.	Mitigation Monitoring Program	V-2

List of Tables

Table II-1	Summary of the Project's Environmental Impacts and Mitigation Measures	II-9
------------	--	------

I. INTRODUCTION

A. Purpose and Use of the Final EIR

This document comprises the Final Environmental Impact Report (“Final EIR”) for the Santa Monica College 2024 Main Campus Master Plan Update (Proposed Project). This document, together with the Draft EIR and its technical appendices, comprise the complete Final EIR for the Proposed Project.

The Santa Monica Community College District (SMCCD or SMC) Board of Trustees is the designated lead agency and is the primary decision-maker in carrying out the Proposed Project. On July 24, 2025, SMCCD published the Notice of Completion (NOC) and Notice of Availability (NOA) for the Draft EIR, which was prepared in accordance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines (California Code of Regulations (C.C.R.), Title 14, Division 6, Chapter 3, § 15123). The Draft EIR was circulated for 45 days, with the review period ending on September 8, 2025.

In accordance with Section 15132 of the CEQA Guidelines, this Final EIR contains the following components:

- (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 Final EIR provides the public and the decision-makers the opportunity to review responses to comments received on the Draft EIR, revisions to the Draft EIR, and other components of the EIR, such as the MMP, as part of the public hearing process for the Proposed Project. The Final EIR serves as the environmental document to inform the decision-makers of the Proposed Project’s potential environmental impacts. The Final EIR will be presented for certification by the decision-making body (SMCCD).

B. Organization of the Final EIR

For purposes of addressing the above requirements in an orderly fashion, this Final EIR is organized in the following sections:

- **Section I (Introduction):** This Section provides a brief overview of this document and describes the purpose and use of the Final EIR.
- **Section II (Executive Summary):** This Section provides a brief overview of the Proposed Project, a summary of the environmental impacts and mitigation measures, as provided in the Draft EIR and as modified by any additions and corrections that are identified in Section IV of this Final EIR.
- **Section III (Responses to Comments on the Draft EIR):** This Section includes all of the comments received on the Draft EIR and provides written comments to each comment as necessary.
- **Section IV (Additions and Corrections to the Draft EIR):** This Section is intended to provide a supplement to the Draft EIR and identifies any additions or corrections necessary to make the information in the Draft EIR clear or to correct the record.
- **Section V (Mitigation Monitoring Program)** The MMP is provided in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the State CEQA Guidelines. The MMP identifies the mitigation measures that are required by the lead agency to reduce or avoid potential adverse environmental impacts.

II. EXECUTIVE SUMMARY

This section of the Final Environmental Impact Report (FEIR) is prepared pursuant to CEQA Guidelines Section 15123, which requires that an EIR include a summary of the Draft EIR. Pursuant to Section 15123 of the State CEQA Guidelines, this Section of the Final EIR contains a brief description of the Proposed Project and the Project actions; identifies potential significant effects and proposed mitigation measures or alternatives that would reduce or avoid those effects; and identifies the areas of controversy known to the lead agency.

A. Project Overview

The Project Site includes Santa Monica College's Main Campus, located at 1900 Pico Boulevard in the City of Santa Monica, CA. Santa Monica College's Main Campus encompasses approximately 43.98 acres generally bounded by Pico Boulevard to the north, 18th Court to the east, Pearl Street to the south, and 16th Street to the west, and includes adjacent properties along Pico Boulevard between 16th Street and 14th Street and along Pearl Street between 17th Street and 18th Court (Project Site).

The Project consists of the adoption and implementation of the Santa Monica College (SMC) 2024 Main Campus Master Plan Update ("Proposed Project") by the SMCCD Board of Trustees. The 2024 Main Campus Master Plan Update is an update to the Career and Educational Facilities 2010 Master Plan (last amended in June 2020) and outlines a renewed framework for the College's future growth and development amidst changes in educational modalities, new opportunities, and optimized use of financial resources for SMC's Main Campus. It is intended to be a living document that provides for the long-range planning framework for SMC's Main Campus and flexibility to accommodate changes in future conditions.

The 2024 Main Campus Master Plan Update would include the demolition of existing temporary and permanent buildings, totaling approximately 360,100 gross square feet (gsf) of building area, and the construction of new replacement buildings consisting of 265,216 gsf of new floor area including the Pico 1 Business Replacement Building (76,474 gsf), the Pico 2 Drescher Hall Replacement Building (99,742 gsf), a new police headquarters building (12,000 gsf), a new student union building (42,000 gsf), a new maintenance and operations (M&O) building (26,000 gsf), and replacement structure(s) for the Pearl Street buildings (9,000 gsf) ("Project"). The Proposed Project would also include approximately 207,073 gsf of building renovations to two existing buildings (the Physical and Life Science Complex and the Library and Media Center). The Proposed Project would create various new and enhanced open spaces throughout the campus, including landscaping the proposed new Student Union building, a Welcome Lawn, an outdoor amphitheater, a Science Quad, the Tri (triangular open space area), and New Quad. The Proposed Project would generally retain the current vehicular circulation and access points and

existing parking supply. The Proposed Project would be constructed in three phases beginning in 2025 with final buildout anticipated to be completed by 2035.

B. Project Objectives

The 2024 Campus Master Plan Update preserves the goals of the 2010 Master Plan Update and provides a framework for identifying the required improvements to the SMC Main Campus environment, facilities, and infrastructure to support students and elevate the campus experience. As such, the underlying purpose of the Proposed Project is to redevelop portions of the existing SMC Main Campus and adjacent SMC buildings to support the goals of the SMC 2024 Master Plan. The Proposed Project's specific objectives are as follows:

- 1) Modernize academic and student spaces to provide excellent environments for learning, studying, collaborating, and gathering that support the engagement and success of students.
 - a) Increase classroom space standards to 25 asf/station minimum and potentially to 35 asf/station.
 - b) Equip classrooms and learning spaces with flexible furniture that ensures active and collaborative learning.
 - c) Ensure access to natural daylight, views to outdoors, as well as thermal and acoustical comfort.
 - d) Provide space for centralized tutoring services to streamline the student experience.
 - e) Integrate areas of scholastic interest (Culture, History, and Language; Education; and Business) in buildings that will best accommodate those fields of study.
- 2) Achieve a more cohesive, first-class, state-of-the-art educational environment by addressing aging, dysfunctional and outdated buildings and facilities on the Main Campus that were designed for different purposes, in some instances were intended to be temporary, and have generally outlived their useful lives and do not best serve the students. This would entail strategically replacing, renovating, or demolishing various structures on campus that are not conducive to meeting SMC's educational mission in their current condition, while at the same time achieving a net decrease in asf (172,990 asf of new construction and 237,888 asf of buildings to be demolished) through greater efficiencies and comprehensive planning.
 - a) Proposed Master Plan Project A: Pico 1 and 2 Buildings, Bus Arrival Plaza, Marquee, and Open Space.

Demolish Drescher Hall, Pico Classroom Complex, and Pico Village due to their irreparable deficiencies. Drescher Hall lacks windows and internal connectivity/circulation on the first floor, poor access to natural daylight on the second floor, and inefficient space layout on the third floor. The building is in poor condition. The building was designed for programs such as Auto Body Repair, Auto Mechanics, Machine Shop, Construction Technology, Welding, and others that are no longer offered at the College and other programs such as Nursing, Earth Sciences, and Drafting have been moved to other locations. The Pico Classroom Complex is outdated and does not serve students well. A 2020 Facilities Assessment recommends demolishing Drescher Hall and the Pico Classroom Complex. Pico Village is composed of temporary trailers that have long outlived their useful lives.

Develop Pico 1 and Pico 2 as replacement buildings that will better serve the educational programs currently offered in Drescher Hall and the Business Building. Pico 1 and Pico 2 will be designed to support new digital and video technologies for Photo; new digital and expansion space for Fashion Design; new laboratories for expanded career options in Cosmetology; among other purposes.

b) Proposed Master Plan Project B: Purpose-Built New Campus Police Headquarters.

Demolish Campus Police A, Campus Police B, and Campus Police Annex. The current buildings are in poor condition, were originally designed for other purposes and are poorly configured for campus police operations. Construct a new fully integrated, purpose-built facility to provide for more effective campus safety and security operations, an enhanced public serving area, and instructional space for public safety training and cadet programs.

c) Proposed Master Plan Project C: Consolidate Maintenance and Operations.

Demolish Math Complex, which was constructed to provide swing space during reconstruction projects on the Main Campus needed due to the 1994 Northridge earthquake. The building has exceeded its useful life. Maintenance and Operations are in scattered locations across the Main Campus. Construct a new building to provide a single location for Maintenance and Operations managers and staff and updated shops for Maintenance. Centralize the recharging of service carts used by Maintenance and Operations.

d) Proposed Master Plan Project D: Student Union, Event Plaza, Amphitheater, and Welcome Lawn.

Demolish the Student Health and Activities Building per a 2020 Facilities Assessment due to its deficiencies and poor condition. The building lacks fire sprinklers. The basement is subject to flooding. Building circulation is awkward. Several of the now internal walls on the ground floor were originally external walls, creating a constricted central corridor and poor connectivity to the cafeteria. The entrance to the building on the western side is confusing and uses three separate pathways—one to the basement, one to the ground floor, and one to the second floor. The two

full-service kitchens are shuttered. Bookstore volume has greatly declined due to the migration away from the use of print textbooks as part of today's curriculum.

Address the need to accommodate updated dining vendors, a right-sized bookstore, improved health and wellness offices, basic needs support services such as the Bodega food pantry, and relocation of various uses from the Pearl Street houses (Auxiliary Services, Campus Events, and the Environmental Center). To better serve the student body, the new building should connect to a student-centered outdoor space where events can be hosted.

Move the Arts program to a new location now under construction at 14th Street and Pico Boulevard, at which point the current Art Complex would become redundant and can be demolished to make way for new open space that would consist of a Welcome Lawn and a relocated and expanded Organic Learning Garden to serve the adjacent Student Union.

e) Proposed Master Plan Project E: Pearl Street Replacements.

Because the Pearl Street facilities are in poor condition, they should be replaced with a new instructional building that would be programmed at a later date.

f) Proposed Master Plan Project F: Demolition of Stadium Shops and Facilities Offices, and Maintenance & Operations Annex (FKA ESL).

Because these buildings have far exceeded their planned operational lives, the Facilities Office building, the Faculty Village trailer, and the M&O Annex (FKA ESL) building would be demolished. Similarly, the maintenance shops tucked under the Corsair Stadium bleachers should be deactivated, but the Stadium structure and bleachers will remain. The demolitions and deactivations would take place after the construction of the new Maintenance and Operations building.

g) Proposed Master Plan Project G: Demolition of Business Building.

After relocating the scholastic programs currently offered in the Business Building into modern new facilities that will become available in the Pico 1 and Pico 2 replacement project, the Business Building would be redundant and should be demolished, to make way for open space, ideally including a water feature that continues the College's unique branding and would provide a cooling atmosphere. The resultant open space could also serve as recreational space for passive relaxation and, at other times, for student activities.

h) Proposed renovations are planned for the Physical and Life Science Complex and for the Library & Media Center.

- 3) Demolish temporary and modular buildings that were never intended as permanent structures and do not best serve the needs and functionality of the campus. To provide superior environs for various academic and student service functions, relocate mission-critical functions from modular or temporary buildings to permanent buildings elsewhere on the campus; thereby allowing for:
 - a) Demolition of M&O Extension Building (FKA ESL Building), Math Complex, Pico Village, Pico Classroom Complex, and Faculty Village.
 - b) Creation of new open spaces and gateway opportunities to provide better campus connectivity.
- 4) Maintain, expand and improve the quality and character of the campus open space. Open spaces define the campus identity and impact every user's experience.
 - a) Maintain the quality of the existing Main Quad as the central organizing feature of the campus.
 - b) Enhance open spaces along the campus edges to provide a welcoming arrival sequence.
 - c) Create new open spaces that front new and renovated buildings and support indoor-outdoor events and gatherings.
 - d) Include native and drought-tolerant plantings that align with campus sustainability goals.
 - e) Create a new water feature to add visual interest and calming water sounds to the campus.
- 5) Beautify and activate Pico Boulevard. As the front door to the Main Campus, the campus presence along Pico Boulevard should be transformed into a welcoming and vibrant experience. This would be served by:
 - a) Demolishing Drescher Hall, Pico Classroom Complex, and Pico Village.
 - b) Placing active programs at ground-level to promote activity.
 - c) Creating an appealing and welcoming bus arrival plaza.
 - d) Establishing a digital marquee along with College branding to ensure recognition, wayfinding and campus information.
 - e) Expanding setbacks and pedestrian pathways to create a continuous, pleasant and improved pedestrian experience along Pico Boulevard.
 - f) Adding streetscape elements such as plantings, trees, seating, and lighting consistent with other areas of the SMC campus and aligned with campus sustainability goals.
- 6) Beautify and activate Pearl Street. To complement the many public-serving facilities now facing Pearl Street, additional improvements would provide a more welcoming and vibrant experience. To further this transformation:
 - a) Replace current makeshift Campus Police headquarters with a purpose-built facility.
 - b) Work in partnership with the City of Santa Monica and Santa Monica-Malibu Unified School District to design Pearl Street improvements that serve all stakeholders.
 - c) Encourage setbacks and pedestrian pathways to encourage outdoor mobility.

- d) Add streetscape elements such as plantings, shade trees, seating, and lighting consistent with other areas of the SMC campus and aligned with campus sustainability goals.
- 7) Move the College toward further sustainability goals by committing to proactive and forward-thinking design decisions. Steps would include:
- a) Complete a Climate Action Plan that includes an Integrated Energy Master Plan.
 - b) Prioritize building metering projects to increase accountability of energy use on campus.
 - c) Include solar energy and battery storage on all new buildings.
 - d) Construct new buildings and major renovations to SMC's sustainability goals, including greenhouse gas reduction.
 - e) Maintain strong relationships with public transportation to continue the reduction of single occupancy vehicles traveling to and from campus.
- 8) Create a flexible plan that can shift with unknowns and to be responsive to funding availability and enrollment trends. Key steps would include:
- a) Establish a standing planning committee.
 - b) Implement each project according to adaptable space principles.
 - c) Check progress every two years and update at five-year intervals to ensure that initiatives in the proposed plan remain relevant.
- 9) Maintain and enhance public safety for students, faculty, administration and visitors through:
- a) Replacing and modernizing campus police headquarters through construction of a purpose-built facility.
 - b) Providing and maintaining well lit open spaces on campus.
 - c) Providing ample secure bicycle parking racks at key locations around the perimeter of the Main Campus to ensure bike-free pedestrian pathways throughout the campus.
 - d) Demolishing and replacing various identified existing aging buildings and modular trailers with new buildings that will meet current seismic and life-safety codes for new construction, consistent with the DSA permitting process.

C. Public Review Process

In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the SMCCD, serving as the Lead Agency: (1) published a Notice of Availability (NOA) of the Draft EIR in the Santa Monica Daily Press on Thursday July 24, 2025 which indicated that the Draft EIR and Technical Appendices will be made available to the public via the College's website at <https://admin.smc.edu/administration/planning/2024-SMC-Campus-Master-Plan.php>; (2) prepared and transmitted a Notice of Availability and Notice of Completion (NOA/NOC) to the State Clearinghouse; and (3) sent a NOA to all NOP commenters as well as the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Proposed Project. Consistent with CEQA requirements, the Draft EIR was circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days from July 24, 2025 to September 8, 2025.

D. Areas of Concern

Potential areas of controversy and issues to be resolved by SMCCD's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. During the NOP comment period, public comments were received regarding general concerns regarding the Proposed Project and environmental impacts to be addressed in the EIR. The predominant areas of concern raised during the NOP comment period include historic resources, biological resources, hazardous materials, tribal cultural resources, and transportation/parking. These issues were addressed in the Draft EIR and no public comment letters were submitted in response to the Draft EIR associated with any of these issues.

E. Significant and Unavoidable Environmental Impacts

As evaluated in Section IV, Environmental Impact Analysis, of the Draft EIR, and summarized in Table II-1, below, all impacts associated with the development of the Proposed Project would be less than significant or reduced to less than significant levels with the incorporation of mitigation measures for all of the environmental topics addressed in the Draft EIR. Impacts were determined to be less than significant prior to mitigation measures for the following impacts areas: Air Quality, Cultural Resources, Energy, Greenhouse Gas Emissions, and Land Use and Planning. Impacts were determined to be less than significant with the incorporation of mitigation measures for the following impacts areas: Aesthetics and Noise. No significant and unavoidable environmental impacts are anticipated to occur as a result of the Proposed Project.

F. Overview of Selected Alternatives

The objective of the project alternatives analysis, as directed by CEQA, is to identify alternatives that could feasibly attain most of the basic objectives of the project but would avoid or substantially

lessen any of the significant effects of the project, and to evaluate the comparative merits of the alternatives. The following Project Alternatives were analyzed in the Draft EIR:

- **Alternative 1 - No Project Alternative.** The No Project Alternative would be a result of not approving the Proposed Project. Under this scenario, the existing SMC Main Campus would remain in place, and no further development would occur.
- **Alternative 2 - Reduced Density Alternative.** Similar to the Proposed Project, the Reduced Density Alternative would involve demolition, construction, and renovation of existing buildings from Phase 1 and Phase 2. Only Phase 3 demolition and construction would be excluded from this Alternative.

As required pursuant Section 15126.6 of the State CEQA Guidelines, this Draft EIR includes selection of an “environmentally superior” alternative from amongst the Project Alternatives analyzed and includes a discussion of the reasons for such selection. The environmentally superior alternative is the alternative that would be expected to generate the least adverse impacts.

While the No Project Alternative was identified as the environmentally superior alternative, CEQA requires an alternative other than the No Project Alternative to be identified and evaluated. Thus, based on the environmental analysis presented in the Draft EIR, the Reduced Density Alternative was identified as the environmentally superior alternative as it would be more effective in further reducing the Proposed Project’s construction noise quality impacts to less than significant levels.

G. Summary of Environmental Impacts and Mitigation Measures

Table II-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.

**Table II-1
Summary of Project's Environmental Impacts and Mitigation Measures**

Environmental Issue	Mitigation Measures (MMs)	Level of Significance After Mitigation
IV.A AESTHETICS		
<i>Threshold (a) Would the Project have a substantial effect on a scenic vista?</i> The City of Santa Monica General Plan Conservation Element does not identify scenic vistas that are available to or from the Project Site or adjacent area. Moreover, the City of Santa Monica General Plan Open Space Element does not identify the Project Site or adjacent area as containing area of scenic value or scenic highways corridors. In addition, the Project Site is not located within a segment of an officially designated or eligible State Scenic Highway. Therefore, there would be no impact related to scenic vistas.	None.	No Impact.
<i>Threshold(b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?</i> Scenic visual resources within the Project Site include a 75-foot tall and 100-foot wide Moreton Bay Fig tree and a Clock Tower. These scenic resources would not be damaged or removed by development of the Proposed Project. The topography of the Project Site and surrounding vicinity is generally level, and views are limited to the immediate viewshed which is characterized by commercial/retail, residential, and institutional land uses that surround the Project Site. Specifically, there are no native trees, rock outcroppings, or historic buildings that would be impacted by the Proposed Project. Furthermore, as stated above, the Project Site is not within the viewshed of a State Scenic Highway. As	None.	No Impact.

such, the Proposed Project would have no impact related to scenic resources within a scenic highway.		
<i>Threshold (c) In nonurbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</i> Construction The Proposed Project would involve intermittent and temporary construction activities within the Main Campus that would be visible to surrounding land uses and passing motorists along Pico Boulevard and Pearl Street. Temporary stockpiles of demolition debris, construction equipment and staging areas, and building framework would be visible from adjacent land uses and within the public right-of-way. Therefore, construction activities would have the potential to result in a significant visual impact before mitigation. Mitigation Measure AES-MM-1 would be implemented to reduce visual blight and screen construction activities from public view. As such, temporary aesthetic impacts during construction would be reduced to less than significant levels after mitigation. Operation The Proposed Project has been designed to comply with City of Santa Monica policies and regulations, including the Land Use and Circulation Element, Open Space Element, and Urban Forest Master Plan. The Proposed Project would replace older outdated buildings with new buildings that would be designed in a manner that is respectful to the adjacent land uses, specifically the	AES-MM-1: The Proposed Project contractors shall ensure the perimeter of active construction areas are securely fenced off and screened from public view. Perimeter fencing shall provide a visual barrier to effectively block the line of sight from the pedestrian viewshed. Fencing and plywood barriers, if used, shall be periodically inspected for graffiti and illegal postings.	Less Than Significant with Mitigation.

surrounding residential neighborhoods. The Proposed Project would also develop six collaborative and complementary open space areas to improve the Project Site's scenic quality. Furthermore, the Proposed Project would not adversely alter a neighborhood or community through ongoing disruption, division, or isolation. Therefore, the Proposed Project would result in a less than significant aesthetic impact related to consistency with scenic quality zoning and other regulations.		
<i>Threshold (d) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</i> <i>Construction</i> Construction activities would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Construction lighting would be shielded to minimize any light trespass onto adjacent areas that could impact views of drivers. Thus, construction light and glare impacts would be less than significant. <i>Operation</i> The Project Site would continue to include low-level exterior lights adjacent to buildings along pathways for security and wayfinding purposes. Lighting for the Proposed Project has been designed to provide for efficient, effective and aesthetically pleasing lighting solutions, to minimize light trespass, reduce sky-glow to increase night sky access, and improve nighttime visibility through glare reduction. The new structures would be designed in a manner that is consistent with the architectural materials incorporated into the existing buildings on the Main Campus. The Master Plan would not cause excessive glare that is out of character with the land	None	Less Than Significant.

uses surrounding the SMC Main Campus or result in a substantial increase in light or glare that would affect surrounding land uses. Light and glare impacts would therefore be less than significant. Additionally, no sensitive adjacent land uses would be impacted by the Proposed Project shadows during the winter or summer months, and shade and shadow impacts would be less than significant.		
IV.B AIR QUALITY		
<i>Threshold (a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?</i> <i>Consistency with 2022 Air Quality Management Plan (AQMP)</i> The determination of AQMP consistency is primarily concerned with the long-term influence of the Proposed Project on air quality in the Air Basin. The Proposed Project would replace and enhance buildings within an existing college campus, which is consistent with the overall growth pattern encouraged in the Southern California Association of Government's (SCAG) Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). Ridership for SMC students and staff is free on all Big Blue Bus line and Metro buses and rail lines through a program funded by SMC and Metro, respectively. The increase in transit accessibility and the existing bicycle parking spaces provided on-site would further reduce vehicle trips and vehicles miles traveled (VMT) by encouraging walking and non-automotive forms of transportation. The Proposed Project would serve to both reduce length and number of trips of automobiles, thereby reducing vehicle emissions. This reduction in VMT would support the goals of the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS. Accordingly, the Proposed Project would support AQMP and RTP/SCS objectives of reducing VMT and the related vehicular air emissions. The Proposed Project would be consistent with the goals and policies of the AQMP and, therefore, would	None	Less Than Significant.

not conflict with or obstruct implementation of the South Coast Air Quality Management District's (SCAQMD) AQMP. Therefore, the Proposed Project would be consistent with and would not conflict with the implementation of the 2022 AQMP, and impacts would be less than significant. <i>Consistency with SMC Air Quality-Related Programs and Policies</i> In January 2020, SMC's Board of Trustees adopted Climate Change and Sustainability Policy Goals. No specific policies are proposed with regard to air quality. However, SMC has adopted climate change and sustainability goals and targets associated with reducing the Proposed Project's air quality and improving energy efficiency. The Proposed Project's characteristics would reduce trips and VMT due to its infill location within a High-Quality Transit Area that has access to public transportation and is within close proximity to multiple other destinations. The Proposed Project would continue to include long-term and short-term bicycle parking spaces throughout campus. Transit ridership on the Big Blue Bus and Metro would continue to be provided to students and staff for free. These features would reduce trips and encourage faculty and students to use alternative modes of transportation including public transportation, walking, and bicycling. As such, the Proposed Project would not conflict with the goals and targets adopted by SMC's Board of Trustees related to air quality, and impacts would be less than significant.		
<i>Threshold (b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</i>	None	Less Than Significant.

<i>Regional Construction Impacts</i> The peak daily regional emissions generated for reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter greater than 10 microns in diameter (PM₁₀) and particulate matter greater than 2.5 microns in diameter (PM_{2.5}) during the construction phases of the Proposed Project would not exceed the regional emission thresholds. Accordingly, the emissions generated by construction activities are well within the margin of safety established to protect human health. Therefore, regional air quality impacts associated with construction emissions would be less than significant. <i>Regional Operational Impacts</i> The Proposed Project would meet the energy efficiency requirements of SMC's Board of Trustees. Specifically, SMC's Resolution to Support Climate Change and Sustainability goals include ensuring that 50 percent of all new buildings and major renovations will achieve at least a Leadership in Energy and Environmental Design (LEED) "Silver" or equivalent rating. The Proposed Project would comply with this goal. Based on the air quality modeling analysis presented in Section IV.B, Air Quality, the Project's regional operational emissions would not exceed the established SCAQMD thresholds. As such, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.		
<i>Threshold (c) Would the project expose sensitive receptors to substantial pollutant concentrations?</i> <i>Localized Construction Air Quality Impacts</i> The closest receptor distance provided in the SCAQMD's Mass Rate Localized Significance Threshold (LST) Look-	None	Less Than Significant.

up Tables is within 82 feet (25 meters). The Project Site encompasses 43 acres, and buildout of the Proposed Project is proposed to occur in three phases throughout a 10-year period. Therefore, the localized significance threshold for sensitive receptors within 25 meters for a 5-acre site was applied for the Proposed Project. On-site emissions generated by the Proposed Project would not exceed the established SCAQMD localized significance thresholds for all three construction phases. Accordingly, the emissions generated by construction activities are below the thresholds of significance for localized emissions and thus are well within the margin of safety established to protect human health. Additionally, the Proposed Project would not result in long-term source of toxic air contaminants (TAC) emissions, since construction emissions would occur for a relatively short time. Furthermore, the Proposed Project's construction activities would not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. Therefore, the localized air quality impacts resulting from construction emissions associated with the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant. <i>Localized Operational Air Quality Impacts</i> On-site localized emissions from the Proposed Project's operation would not exceed the established SCAQMD localized thresholds. Therefore, localized operational related air quality impacts would be considered less than significant. Additionally, potential air toxic impacts to sensitive receptors from Project Toxic Air Contaminant (TAC) emissions would also be less than significant. Furthermore, the Proposed Project would not increase the parking capacity at the Main Campus and is not anticipated to generate additional vehicle trips to the campus. Therefore, the Proposed Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. Thus, the		
--	--	--

Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.		
IV.C CULTURAL RESOURCES		
<i>Threshold (a) Would the Project cause a substantial adverse change in significance of a historical resource pursuant to Section 15064.5?</i> The Proposed Project includes the demolition of existing temporary and permanent buildings, totaling approximately 360,100 gross square feet (gsf) of building area, and the construction of new buildings consisting of 265,216 gsf of new floor area. None of the buildings on the Project Site warrants treatments as a historical resource pursuant to CEQA. Therefore, the Proposed Project would not result in the demolition a historical resource. As such, the Proposed Project would not cause a direct substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 and impacts would be less than significant. Indirect impacts may involve alteration to the surroundings of a historical resource that could remove part or all of the associated setting of an historical resource, remove character-defining features or spaces surrounding the historical resource, or substantially impair or obscure the ability of the resource to convey its historical significance. Because there are no historical resources located on the Project Site, the Proposed Project would not cause potential indirect impacts to historical resources on the Project Site. As such, the Proposed Project would not cause an indirect substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and indirect impacts to off-site historic resources would be less than significant.	None	Less Than Significant.
<i>Threshold (b) Would the Project cause a substantial adverse change in the significance of an</i>	None	Less Than Significant.

archaeological resource pursuant to § 15064.5? Since its establishment in 1940, the Main Campus has undergone constant change over time, including the demolition and alteration of the original buildings, and the introduction of substantial new construction throughout the campus. As such, the Main Campus has been subject to extensive surface grading and excavation throughout the years. Based on prior grading and disturbance to subsurface soils that has occurred on the Project Site, and the lack of recorded archaeological resources known to occur within the Project Site, it appears unlikely that any subsurface archaeological resources exist within the Main Campus. However, the lack of encountering archaeological resources during previous grading activities on the Main Campus does not preclude the potential for future discovery of unknown archaeological resources. In the unlikely event any archaeological resources are found on the Project Site during construction activities, the significance of such resources would be determined and be addressed in accordance with applicable State and Federal laws, including those set forth in California Public Resources Code Section 21083.2. In accordance with existing laws, personnel implementing the Proposed Project shall be directed not to collect or move any archaeological resources, tribal cultural resources or associated materials. Construction activity may continue unimpeded on other portions of the Project Site as approved by the retained archaeologist in consultation with the City. Compliance with existing regulatory requirements would ensure appropriate treatment of any potential archaeological resources should they be discovered during construction of the Proposed Project. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of an archaeological resource, and impacts would be less than significant.		
Threshold (c) Would the Project disturb any human	None	Less Than Significant.

<i>remains, including those interred outside of dedicated cemeteries?</i> The Proposed Project construction activities are anticipated to minimally excavate beneath the Project Site for building foundations. In the event that human remains are encountered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. Compliance with existing regulatory requirements would ensure appropriate treatment of any potential human remains should they be discovered during construction of the Project. Therefore, the Proposed Project would not directly or indirectly disturb any human remains, including those interred outside of dedicated cemeteries, and impacts would be less than significant.		
IV.D ENERGY		
<i>Threshold (a) Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</i> <i>Construction</i> The Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction. The estimated construction electricity usage would be utilized for the treatment and conveyance of water for dust suppression activities during the site clearing and excavation/grading subphases during all three construction endpoints. Additional electricity would be required for the use and operation of a temporary construction office throughout the duration of the construction process. Electricity use from construction would be short-term and would represent a small fraction	None	Less Than Significant.

of the net annual operational electricity demand of the existing uses. The estimated construction electricity usage would also be offset by the reduction in electricity demand from the existing less energy efficient buildings that would be demolished. Additionally, natural gas would not be supplied to support the proposed construction activities; thus, there would be no expected demand generated by construction of the Proposed Project. Furthermore, transportation energy would be consumed during the site clearing, demolition, excavation, building construction, architectural coatings, and paving subphases of construction in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). The estimated transportation energy is based on a conservative set of assumptions, such as assuming a majority of equipment would be operating continuously (8 hours per day) throughout the entire duration of construction. Additionally, all trucks, on-road vehicles, and equipment used during proposed construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation and fuel efficiency requirements. As such, fuel efficiency for on-road vehicles would improve over time. As such, the energy requirements and energy use during construction would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant. Operation During operation of the Proposed Project, energy would be consumed by several building operation systems including,		
---	--	--

but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office equipment, and commercial machinery (including kitchen appliances). Energy would also be consumed related to water treatment and conveyance, solid waste disposal, and vehicle trips. Proposed Project maintenance would include activities such as repair of structures, landscaping, and reapplication of architectural coatings. Energy usage related to the proposed building maintenance activities are assumed to be included as part of the Proposed Project operations. The Main Campus is already served by existing electricity infrastructure, which includes 779 KW of photovoltaic electricity panels incorporated into various structures on the campus and connections to the SoCal Edison and Clean Power Alliance grid. As required by the 2022 Title 24 Standards and CalGreen, the Proposed Project would be required to incorporate eco-friendly building materials, systems, and features, including ENERGY STAR-rated appliances, water saving and low-flow fixtures, low-emitting materials and adhesives with low volatile organic compounds (VOC), drought tolerant planting, and high-performance mechanical equipment. Additionally, as required by SMC's Board of Trustees Climate Change and Sustainability Policy Goals, 50 percent of all new buildings would be required to meet the LEED "Silver" rating or higher, which would further reduce overall electricity and natural gas usage. The Proposed Project at full buildout would result in an overall decrease of electricity usage, natural gas demand, and transportation energy due to the reduced building square feet. Additionally, the Proposed Project continue to provide free ridership to BBB and Metro bus lines, which serve to reduce the Proposed Project's operational VMT. Furthermore, the use of petroleum-based fossil fuel is expected to decrease in future years as the use of alternative fueled vehicles increases. The Proposed Project's demands on electricity, natural		
---	--	--

gas, and transportation energy would not significantly affect local and regional supplies or capacity. The Project's energy usage during base and peak periods would be consistent with electricity future projections for the region. Electricity and natural gas generation capacity and transportation fuels would be sufficient to meet the needs of Project-related operational activities. Additionally, the Proposed Project would comply with all energy conservation standards applicable to the Proposed Project. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, the Proposed Project would not cause wasteful, inefficient, and unnecessary consumption of energy during operation, and impacts with respect to energy consumption would be less than significant.		
<i>Threshold (b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</i> The Proposed Project would be required to comply with the CALGreen Code, Title 24 Standards, and SMC's Board of Trustees Climate Change and Sustainability Policy Goals. Compliance with state and local energy efficiency standards would ensure the Proposed Project meets all applicable energy conservation policies and regulations. SMC's Climate Change and Sustainability Policy Goals require that 50 percent of all new buildings that are at least half funded with Proposition A/AA Bond funds be "green" buildings, built to LEED "Silver" certification standards, or equivalent. Furthermore, vehicle trips generated during Proposed Project operations would comply with CAFE fuel economy standards. During construction activities, the Proposed Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations. The Proposed Project would be consistent with applicable goals, measures, and policies of programs and plans that intend to reduce the reliance on fossil fuels,	None	Less Than Significant.

reduce greenhouse gas emissions, reduce energy demand, and promote overall public health. Such programs and plans include the 2022 Scoping Plan, the 2020-2045 RTP/SCS, 2024-2050 RTP/SCS, and SMC's Climate Change and Sustainability Policy Goals. Thus, the Proposed Project would not conflict with any adopted energy conservation plans. As such, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.		
IV.E GREENHOUSE GAS EMISSIONS		
<i>Threshold (a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i> <i>Threshold (b) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</i> The City of Santa Monica or SMC has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. In addition, neither SCAQMD, OPR, CARB, CAPCOA, nor any other state or regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. For information purposes, the analysis also calculates the	None None	Less Than Significant. Less Than Significant.

amount of GHG emissions that would be attributable to the Proposed Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. <i>Consistency with the Climate Change Scoping Plan</i> The Proposed Project would be consistent with applicable greenhouse gas (GHG) reduction strategies in the 2022 Climate Change Scoping Plan. The 2022 Scoping Plan provides new approaches to a balanced and aggressive course of effective actions to achieve carbon neutrality in 2045, if not before, in addition to the 2030 goal. To assist local jurisdictions, the 2022 Scoping Plan presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (transportation electrification, VMT reduction, and building decarbonization). The Proposed Project would not conflict with these strategies by continuing to maintain existing EV chargers on the Main Campus, which would be consistent with the Scoping Plan goals of transitioning to EVs. Additionally, the Proposed Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips and VMT. SMC would continue to provide students and staff free transit ridership on the Big Blue Bus and Metro. Moreover, the Proposed Project would incorporate eco-friendly building materials, systems, and features, including ENERGY STAR-rated appliances, water saving and low-flow fixtures, low-emitting materials and adhesives, drought tolerant planting, and high-performance mechanical equipment. Specifically, as required by the SMC Board of Trustees, at least 50 percent of all new buildings would be required to meet the LEED "Silver" rating or higher and would be constructed at Zero Net Energy buildings, which would further reduce overall electricity usage. Thus, the Proposed Project would be		
--	--	--

consistent with applicable GHG reduction strategies in the 2022 Climate Change Scoping Plan. <i>Consistency with SCAG 2020-2045 RTP/SCS and 2024-2050 RTP/SCS</i> The Project Site is located in a High Quality Transit Area (HQTa) and promotes the connectivity of the Project Site to the surrounding neighborhood area by providing safe, clean, improved and easy-to-use pedestrian and bicycle access. The Proposed Project would also provide on-site bicycle storage areas for its students and staff to facilitate and encourage alternative modes of transit. Additionally, consistent with RTP/SCS goals, the Project Site would be served by BBB local lines 7, 8, 16, 41, 43, and Rapid 7; and Metro's Expo Line. The Proposed Project would provide students, staff, and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. Additionally, the Project involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020-2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. The 2024-2050 RTP/SCS policy initiative focuses on exploring and advancing the transition toward zero-emission and clean technologies and other transformative technologies, where viable. SMC currently implements many sustainability features at the SMC campus to reduce overall GHG emissions. Such features include recycling and zero waste programs, constructing new buildings that meet LEED rating systems, rain catchment systems and water conservation programs, and solar energy generation. Thus, the Proposed Project would improve energy efficiency. In sum, the Proposed Project is a land use development that is consistent with the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the		
--	--	--

region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long-term climate policies. By furthering implementation of SB 375, the Proposed Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Proposed Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS. Overall, the Proposed Project would not conflict with the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS, which are intended to reduce GHG emissions. <i>SMC Board of Trustees – Climate Change Goals and Policies</i> As mentioned previously, SMC’s Board of Trustees has adopted Climate Change and Sustainability Policy Goals, which are aimed at reducing GHG emissions. SMC currently implements many sustainability features at the SMC Main campus to reduce overall GHG emissions. Such features include recycling and zero waste programs, constructing new buildings that meet the LEED “Silver” rating system, rain catchment systems and water conservation programs, solar energy generation, and solid waste reduction. The Proposed Project would be designed and constructed to meet SMC’s building standards and policy goals. As such, the Proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. The Proposed Project would be consistent with the Scoping Plan, SCAG’s 2020-2045 and 2024-2050 RTP/SCS, and SMC’s Climate Change and Sustainability Policy Goals. Therefore, Project-specific impacts with regard to GHG emissions and climate change would be less than significant. <i>Construction Emissions</i>		
---	--	--

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. Emissions of GHGs were calculated using California Emissions Estimator Model (CalEEMod) for each phase and each year of construction of the Proposed Project. Construction-related GHG emissions from Proposed Project construction activities are estimated to be approximately 4,462 MTCO₂e. The total construction emissions are amortized over 30 years and are incorporated into the Proposed Project's annualized operational emissions. Thus, the 4,462 MTCO₂e of construction emissions equates to 149 MTCO₂e per year during the life of the Proposed Project. <i>Operational Emissions</i> The Proposed Project would renovate and replace buildings on the SMC Main Campus in an area near mass transit and a broad mix of land uses. Since the Proposed Project would not change land uses and would overall reduce the number of overall floor area, the Proposed Project is not anticipated to generate any new vehicle trips to the Main Campus, resulting in a less than significant VMT impact. For purposes of demonstrating the Proposed Project's consistency with SB 32 and the State's goals for reducing GHG emissions, the Proposed Project's GHG emissions were quantified using the CalEEMod program to reflect the Proposed Project being an infill development, providing development within walkable accessibility to transit, the pre-installation of energy efficient ENERGY STAR-rated appliances, meeting the applicable provisions of the California Energy Code, and meeting conservation requirements of SMC's Board of Trustees. Since the Proposed Project would reduce the total floor area on the SMC Campus, and would develop newer sustainable buildings, the Proposed Project would result in an overall decrease in GHG emissions, when compared to existing		
---	--	--

uses. In conclusion, based on the above, the Proposed Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Proposed Project is consistent and does not conflict with these plans, policies, and regulations, the Proposed Project's overall decrease in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.		
IV.F LAND USE AND PLANNING		
<i>Threshold (a): Would the project physically divide an established community?</i> The Proposed Project is an infill development project and would not expand the boundaries of the current SMC Campus. The Proposed Project's development would be limited to the Project Site and would not physically divide an established community.	None	No Impact.
<i>Threshold (b) Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</i> <i>Consistency with the 2020-2045 RTP/SCS</i> The Proposed Project would be consistent with applicable goals of the 2020-2045 RTP/SCS. The Project Site is located in a HQTAs and promotes the connectivity of the Project Site to the surrounding neighborhood area by providing safe, clean, improved and easy-to-use pedestrian and bicycle access. The Proposed Project would continue to provide on-site bicycle storage areas for its students and staff to facilitate and encourage alternative modes of transit. Additionally, the Project Site would be	None	Less Than Significant.

served by local and inter-city transit operators including seven BBB bus lines and Metro's Expo Line. The Proposed Project would provide students, staff, and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. The Proposed Project would be generally consistent with the 2020-2045 RTP/SCS goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation. Therefore, the Proposed Project would be consistent with the population and growth projections of SCAG's 2020-2045 RTP/SCS, and the Proposed Project would not conflict with the applicable goals of SCAG's 2020-2045 RTP/SCS.

Consistency with the 2024-2050 RTP/SCS

The Project Site's location, scale, and mixture of land uses would be consistent with its designation within Priority Development Areas (PDAs), which, in turn, indicates consistency with the use designations, density, and buildings intensity of the SCS. As previously discussed, the Project Site is located in an urbanized area within the City of Santa Monica. The Proposed Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of residential and commercial uses. The Proposed Project includes the development and improvement of existing buildings on the SMC Main Campus. The Proposed Project would incorporate a variety of new open space, student amenities, and improved classrooms to modernize academic and student spaces to provide a better educational environment. The Project Site is located in an urban area near transit, which would provide opportunities for Project staff, students, and visitors to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips. The

pedestrian-scaled design of the Proposed Project and pedestrian and bicycle circulation improvements would encourage the use of alternative modes of travel, thereby further reducing reliance on automobile travel and reducing GHG emissions. Overall, the nature of the Proposed Project, including the location, mix of uses, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PDAs. Furthermore, the Proposed Project would be consistent with the intent of the specific PDAs in which it is located or adjacent to. As such, the Proposed Project would be consistent with the 2024–2050 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development. <i>Consistency with the City of Santa Monica General Plan</i> The Land Use and Circulation Element (LUCE) is the governing document that identifies allowable land uses and establishes goals, policies, and development criteria for land uses and circulation in the City. The LUCE includes a number of goals and policies that provide guidance for future development, including education. The Proposed Project would be consistent with relevant LUCE goals and policies related to preserving and enhancing existing neighborhoods; integrating land use and transportation for GHG reduction; and encouraging walking, bicycling, and public transit. <i>Consistency with the City of Santa Monica Zoning Code</i> The SMC Main Campus is zoned PL – Institutional / Public Lands and has a land use designation of Institutional / Public Lands. The properties along south side of Pico Boulevard between 14th Street and 16th Street are zoned Neighborhood Commercial and R1- Single Unit Residential with corresponding land use designations of Neighborhood		
---	--	--

Commercial and Single Family Housing, respectively. The properties on the south side of Pearl Street are zoned R-1 Single Unit Residential with a corresponding land use designation of Single Family Housing. Although some of the proposed new construction would exceed the height allowed by the City's Zoning Ordinance, the Proposed Project would have less than significant impacts related to height and visual character and design. This technical inconsistency would be resolved through the SMCCD's utilization of Section 53094 of the California Government Code, which provides that school districts may override local zoning regulations. This height inconsistency would not result an adverse physical effect on the environment. Therefore, the Proposed Project's impacts associated with the PL and R1 zoning classifications of the City's Zoning Ordinance would be considered less than significant. In summary, the development of the Proposed Project would be generally consistent and not conflict with the various land use plans, policies and development regulations of the 2020-2045 RTP/SCS, 2024-2050 RTP/SCS, the City's General Plan (including the LUCE), and existing land use patterns. Furthermore, the City of Santa Monica Zoning Ordinance is subject to override by the SMCCD based on the provisions of Section 53094 of the California Government Code which provides that school districts may override local zoning regulations. Therefore, the Proposed Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect, and impacts related to land use policy consistency would be less than significant.		
IV.G NOISE		
<i>Threshold (a) Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the</i>	NOI-MM-1: Phase 1 – Police Headquarters. Temporary construction sound barriers shall be erected along the	Less Than Significant with Mitigation.

<i>Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</i> <i>Construction Noise Impacts</i> <i>On-Site Construction Noise</i> Construction of the Proposed Project would require demolition, earthwork, building construction activities, and renovation activities that would generate noise on a temporary and intermittent basis throughout the duration of the construction process. The Proposed Project would be constructed in three phases with final buildout anticipated to be completed by 2035. Construction activities would be performed in accordance with all applicable state and federal laws, and City Codes and policies with respect to building construction and activities. Construction noise impacts would not exceed the level of significance at any of the sensitive receptors analyzed during Phase 1 and Phase 2 construction. However, Phase 3 construction noise levels would increase exterior ambient noise levels at Sensitive Receptors 1, 3, and 13 during the demolition and grading phases by more than 20 dBA L_{eq}. As such, Phase 3 construction noise impacts would be potentially significant prior to mitigation. Mitigation Measures NOI-MM-1 and NOI-MM-2 would be implemented to reduce the Proposed Project's on-site construction noise levels to below the 20-dBA above ambient level of significance. Thus, on-site construction impacts would be less than significant with mitigation. <i>Off-Site Haul Truck Construction Noise</i> The Proposed Project's construction activities would generate off-site noise impacts during construction due to materials delivery, haul trucks, and employee and vendor construction trucks from workers accessing the Project Site. The highest level of noise from these noise sources	eastern, western, and southern boundaries of the Campus Police Headquarters site prior to demolition and remain in place throughout construction activities. The construction sound barriers shall be a minimum of 8 feet in height and designed to provide a minimum 5 dBA reduction in noise level at Sensitive Receptors 1, 2, and 3. Alternatively, the Applicant may utilize other means and methods to ensure the construction activities do not exceed 20 dBA L_{eq} during construction activities. Such means and methods may include but are not limited to installing temporary noise shields or baffles around heavy duty construction equipment, limiting the number of pieces of heavy-duty equipment operating within the same time and space, and minimizing construction noise activity levels to the maximum extent feasible. NOI-MM-2: Phase 3 – Pearl Street Replacement Buildings. Temporary construction sound barriers shall be erected along the eastern, western, and southern boundaries of the Pearl Street Replacement Buildings prior to demolition and will remain in place throughout construction activities. The construction sound barriers shall be a minimum of 8 feet in height and designed to provide a minimum 5 dBA reduction in noise level at Sensitive Receptors 1 and 3. Alternatively, the Applicant may utilize other means and methods to ensure the construction activities do not exceed 20 dBA L_{eq} during construction activities. Such means and methods may include but are not limited to installing temporary noise shields or baffles around heavy duty construction equipment, limiting the number of pieces of heavy-duty equipment operating within the same time	
--	--	--

would be generated by haul trucks for demolition debris and soil export during construction. During the course of the combined excavation and other construction activities, it is estimated that a total of approximately 20,151 cy of demolition debris and 10,000 cy of soil material would be transported to and from the Project Site. The peak daily hauling activity would occur during Phase 2, which would generate approximately 62 daily truck trips (31 inbound, 31 outbound) for a period of approximately 66 days. The minimal increase in noise levels would not be discernable to residents or occupants and visitors in any of the sensitive uses along the haul route. Haul truck noise increase would be well below the significance criteria of 3 dBA above ambient noise levels for the hauling street segments closest to the Project Site. As such, the hauling activities during construction would result in a less than significant impact to off-site noise receptors. Operational Noise Impacts <i>Operational Roadway Noise</i> The Project Site currently has a total of 2,860 parking spaces within the parking garages and surface parking lots to accommodate the existing SMC Main Campus demand. No additional parking spaces are proposed. Additionally, as the Proposed Project would result in a net decrease on total floor area as compared to existing conditions, the Proposed Project is not anticipated to increase vehicle trips, resulting in a net reduction in VMT impacts. Therefore, implementation of the Proposed Project would not double the amount of peak hour traffic volumes along any of the nearby roadway segments or intersections. As such, mobile source noise from the Project would be less than 3 dBA, and operational noise impacts due to roadway noise would be less than significant. <i>Outdoor Activity Noise Levels</i>	and space, and minimizing construction noise activity levels to the maximum extent feasible. NOI-MM-3: Phase 3 - Art Complex and Welcome Lawn. Temporary construction sound barriers shall be erected along the eastern boundary of the Art Complex construction site during building demolition and surface grading activities. The construction barrier shall be a minimum of 8 feet in height and designed to provide a minimum 5 dBA reduction in noise at Sensitive Receptor 13. Alternatively, the Applicant may utilize other means and methods to ensure the construction activities do not exceed 20 dBA L_{eq} during construction activities. Such means and methods may include but are not limited to installing temporary noise shields or baffles around heavy duty construction equipment, limiting the number of pieces of heavy-duty equipment operating within the same time and space, and minimizing construction noise activity levels to the maximum extent feasible. NOI-MM-4: On-Site Sensitive Receptors. The following measures shall be implemented to reduce potential impacts to on-site noise sensitive receptors. • During the active construction periods, equipment and trucks used for construction shall utilize the best available noise control techniques (e.g., improved mufflers, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible. • Stationary equipment such as generators and air compressors, construction	
---	---	--

Sources of outdoor noise due to human activities and uses include gatherings within the open-air amenity spaces located at the main quad, new quad, the tri, event plaza/amphitheater, welcome lawn, science quad, and organic learning garden. Use of these outdoor open space areas would be intermittent throughout the day, and the noise generated by the use of these areas would be consistent with the existing passive student activities commonly occurring within the Main Campus. These new open space areas are located throughout the SMC Main Campus and would be shielded by the Proposed Project's building configuration such that activity noise would not affect neighboring properties. Additionally, activities conducted on public or private school grounds, including school athletic and school entertainment events, are exempt from the City's noise standards. Thus, the proposed outdoor open space areas would not generate significant noise impacts, and noise impacts from outdoor activities would be less than significant. <i>Mechanical Equipment and HVAC Noise Levels</i> New mechanical equipment, HVAC units, and exhaust fans would be installed on the roof of the proposed new structures. Although the operation of this equipment would generate noise, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations under Section 4.12.130 of the SMMC, which states that roof locations may be used when the mechanical equipment is installed within a noise attenuating structure. Thus, the on-site equipment would be designed such that all rooftop mechanical equipment would be shielded, and appropriate noise muffling devices would be installed on the equipment to reduce noise levels that affect nearby uses. The estimated ambient plus the Proposed Project's HVAC noise levels at nearby sensitive receptors would be below the 5-dBA L_{eq} increase above	staging areas, and material stockpiling area should be located as far away from on-site instructional areas as feasible. • Temporary sound walls and/or acoustic blankets shall be installed as necessary to block the line-of-sight between the sensitive receptor and the noise source to ensure an interior noise level of 50 dBA or lower is achieved for any occupied interior classroom spaces.	
---	--	--

ambient noise levels at the sensitive receptors. As such, noise impacts from mechanical equipment would be less than significant.		
<i>Threshold (b): Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?</i> <i>Construction Impacts</i> <i>On-Site Construction Vibration</i> Construction activities that would occur within the Project Site would have the potential to generate low levels of groundborne vibration on a temporary and intermittent basis during construction. Construction equipment may cause the ground to vibrate, which can impact nearby buildings or cause human annoyance for people in the vicinity. Vibration impacts would be below the threshold criteria to cause ground-borne vibration damage. Additionally, the estimated groundborne vibration levels from construction equipment would be below the significance criterion for human annoyance at all off-site sensitive receptor locations. Therefore, on-site vibration impacts with respect to human annoyance during construction of the Proposed Project would be less than significant. Therefore, construction activities would have a less than significant groundborne vibration impact with respect to building damage and human annoyance. <i>Off-Site Construction Vibration</i> During the course of the combined excavation and other construction activities, heavy-duty construction trucks would generate ground-borne vibration (similar to the trucks and buses that uses these routes in the existing conditions) as they travel along the anticipated truck route(s). The construction activity is temporary, and the source of potential off-site vibration (delivery/haul trucks on	None	Less Than Significant.

the haul routes) is not materially different than the type and volume of vehicles currently on the haul routes. The haul routes are heavily traveled vehicular routes that provide access to regional freeways. In the existing conditions, there is a high volume of vehicular traffic, including heavy trucks and numerous buses that travel on the proposed haul routes. Moreover, hauling activity would not occur during nighttime hours, which according to the FTA guidance is a consideration for impact analysis. According to the FTA, it is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Buses and trucks rarely generate vibration that exceeds 70 Vdb, which would be less than the significance threshold of 72 VdB for human annoyance or building damage. Therefore, vibration impacts from off-site construction activities would be less than significant.

Operational Impacts

The Proposed Project would not involve the use of stationary equipment that would result in high vibration levels. The Proposed Project would not introduce substantially more heavy-duty trucks and therefore would not result in a substantial use of heavy-duty vehicles on the public roadways that would generate excessive vibration impacts beyond existing conditions. Similarly, while refuse trucks would be used for the removal of solid waste at the Project Site, these trips already occur a few times a week to service the existing SMC Main Campus and would not be materially different than those presently occurring in the vicinity of and on the Project Site. As such, vibration impacts associated with operation of the Project would be less than significant.

III. RESPONSES TO COMMENTS

The section of the Final EIR provides written responses to comments received on the Draft EIR. The Draft EIR was available for a 45-day public review period between July 24, 2025 to September 8, 2025. During this period, one comment letter was received by the lead agency. A copy of this comment letter is provided below and is followed by the lead agency's response.

A. Comment Letter(s)

COMMENT LETTER 1

Jeff Modrzejewski
CREED LA
501 Shatto Place, Suite 200
Los Angeles, CA. 90020
August 28, 2025 [via email]
w/Attachment dated August 18, 2025

COMMENT LETTER No. 1

From: Amy Smith <amy@creedla.com>

Date: Monday, August 25, 2025 at 1:08 PM

To: YEN_CHARLIE <YEN_CHARLIE@smc.edu>

Subject: RE: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – SMC 2024 Main Campus Master Plan Project, 1900 Pico Blvd, SCH# 2025010279

CAUTION: This email originated outside SMC.

RE: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – SMC 2024 Main Campus Master Plan Project, 1900 Pico Blvd, SCH# 2025010279

To Whom It May Concern,

CREED LA is writing to request a copy of any and all records related to the Santa Monica College 2024 Main Campus Master Plan Update, located 1900 Pico Blvd in Santa Monica in Los Angeles County. The project will be the demolition of existing buildings and the construction of 5 new buildings totaling 265,216 sf of building space as well as building renovations and improvements to the physical and life sciences complex and the library and media center totaling 207,073 sf of improved space.

Our request for mailed notice of all hearings includes hearings, study sessions and community meetings related to the Project, certification of the MND (or recirculated DEIR), and approval of any Project entitlements. This request is made pursuant to Public Resources Code Sections 21092.2, 21080.4, 21083.9, 21092, 21108 and 21152 and Government Code Section 65092, which require local agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body. Our request includes notice to any City actions, hearings or other proceedings regarding the Project, Project approvals and any actions taken, or additional documents released pursuant to the California Environmental Quality Act.

Our request for all records related to the Project is made pursuant to the California Public Records Act. (Government Code § 6250 et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (877) 810-7473 with a cost estimate before copying/scanning the materials.

COMMENT LETTER No. 1 (Continued)

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments.

My contact information is:

U.S. Mail

Jeff Modrzejewski
CREED LA
501 Shatto Place, Suite 200
Los Angeles, CA. 90020

Email

creedla@creedla.com

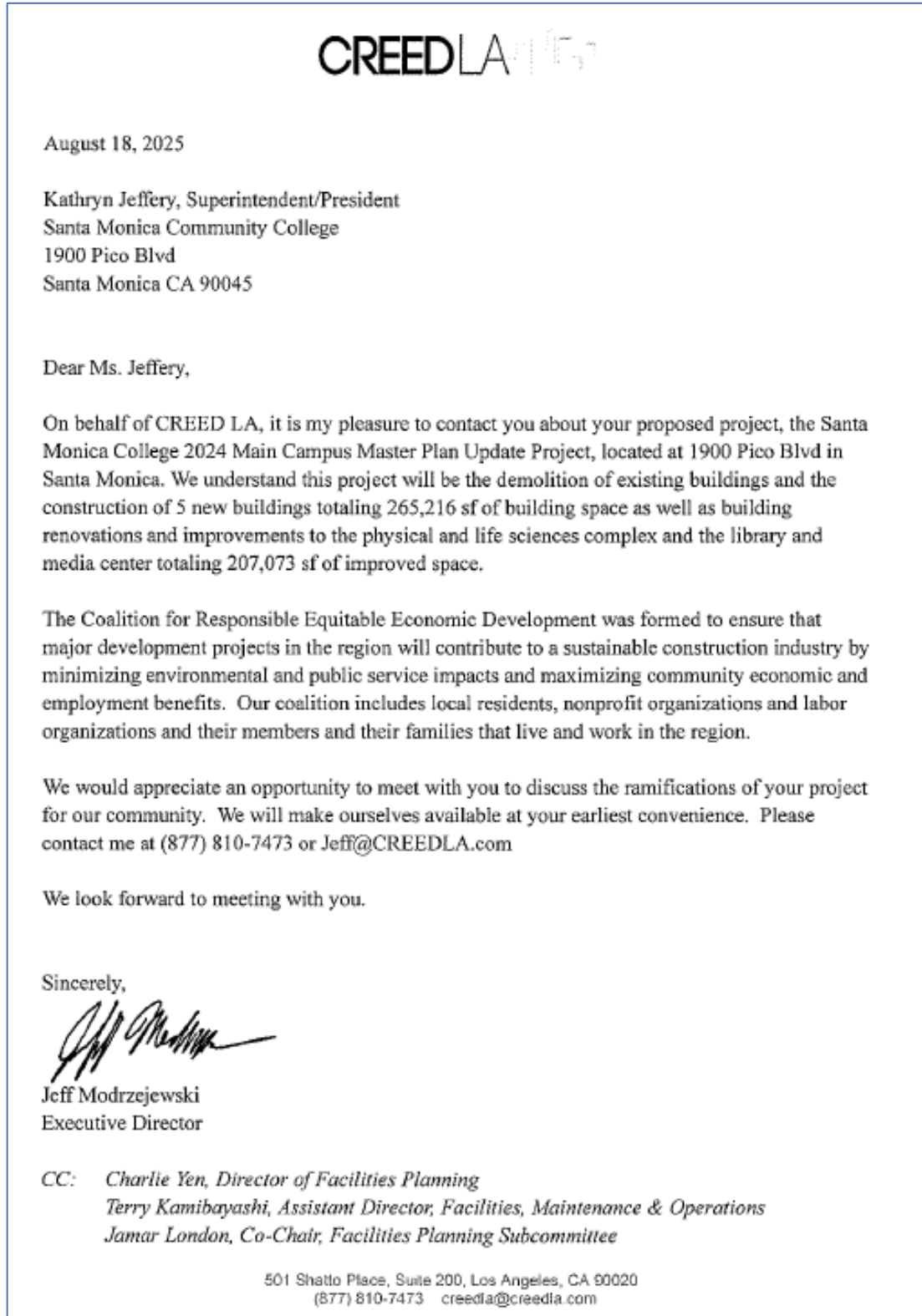
Please call me if you have any questions. Thank you for your assistance with this matter.

<image001.png>

Sincerely,

Jeff Modrzejewski
Executive Director

COMMENT LETTER No. 1 (Attachment)



RESPONSE TO COMMENT LETTER No.1

Comment Letter No 1 identifies the Coalition for Responsible Equitable Development (CREED LA) and includes a records request pursuant to Public Resources Code (P.R.C.) 21092.2, 21080.4, 21083.9, 21092, 21108, and 21152 and Government Code Section 65092. On behalf of the lead agency, Robert Myers, Campus Counsel, responded to CREED's records request and provided CREED with a website address to access the project-related documents online. A copy of SMC's response is provided below. No further communication was provided by CREED LA during the course of the Draft EIR public review period.

Lead Agency Response

From: Robert M. Myers <myers_robert@gapps.smc.edu>

Sent: Saturday, August 30, 2025 2:04 PM

To: creedla@creedla.com

Cc: 'Amy Smith' <amy@creedla.com>

Subject: Public Records Act Request and Request for Mailed Notice of Public Hearings and Actions – SMC 2024 Main Campus Master Plan Project, 1900 Pico Blvd, SCH# 2025010279

Mr. Modrzejewski:

On behalf of the Santa Monica Community College District, we acknowledge receipt of your email dated August 25, 2025, requesting certain public documents and mailed notice concerning the SMC Main Campus Master Plan Project. College staff have been instructed to provide you with future notice pursuant to your request as required by law.

In connection with your request for public records, the College has posted principal projected related documents at the following website:

<https://admin.smc.edu/administration/planning/2024-SMC-Campus-Master-Plan.php>

You should find everything you need to assess the project at this site. (Note: We do not post certain administrative record documents such as proof of publication; transmittal to State Clearinghouse, etc.) This site will be updated as additional documents related to the Master Plan are released.

If you require any other documents, please do not hesitate to contact me.

Sincerely yours,

Robert M. Myers

Campus Counsel
Santa Monica College
1900 Pico Boulevard
Santa Monica, California 90405

e-mail: Myers_Robert@smc.edu

Mobile: [REDACTED]

IV. ADDITIONS TO THE DRAFT EIR

A. Introduction

This section of the Final EIR provides changes to the Draft EIR that have been made to revise and clarify the environmental impact analysis related to the discussion of the environmentally superior alternative. This additional information is being provided to provide further discussion on the rationale for selecting the environmentally superior alternative and does not affect the environmental analysis or findings related to the Proposed Project or the environmental analysis related to the project alternatives.

B. Additions

Table of Contents: add the following section to follow Section V.2:

“V-3 Environmentally Superior Alternative.....V-41

Section V. Project Alternatives: Add the following subsection and text to follow page IV-41 of the Draft EIR.

“Section V.3, Environmentally Superior Alternative

As identified above on page V-8, Alternative 1 - No Project Alternative was selected as the first environmentally superior alternative on the basis of the minimization or avoidance of physical environmental impacts. However, CEQA Guidelines Section 15126.6(e)(2), provides that “if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Table V-1, Environmentally Superior Alternative Matrix presents a summary of the impact conclusions for each alternative relative to the impact statements for the impact areas evaluated in the EIR. As shown in Table V-I, Alternative 2 - Reduced Density Alternative would be a less impactful development than the Proposed Project, which would be effective in reducing the Proposed Project’s construction-related impacts associated with regional and localized air quality emissions, energy consumption, greenhouse gas emissions, and construction noise and vibration impacts. As compared to the Proposed Project, the reduction in construction related activities would be advantageous from an environmental perspective as it would minimize and reduce construction impacts associated with the final phase of development. For these reasons, the Reduced Density Alternative was identified as the Environmentally Superior Alternative.”

V. MITIGATION MONITORING PROGRAM

A. Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The purpose of the MMP is to ensure that mitigation measures provided in the Environmental Impact Report (EIR) minimize or avoid significant adverse effects. The MMP is also a working guide to facilitate not only the implementation of mitigation measures by the project’s proponent, but also the monitoring, compliance, and reporting activities of the implementing agency and any monitors it may designate.

In response to established CEQA requirements, the proposed MMP shall be submitted to the Santa Monica Community College District (the designated Lead Agency) for consideration prior to completion of the environmental review process to enable the decision-makers appropriate response to the Proposed Project. Although the Lead Agency may delegate reporting or monitoring responsibilities to other agencies or entities, it “...remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.” (State CEQA Guidelines Section 15097(a).)

The MMP describes the procedures for the implementation of the mitigation measures to be adopted for the Proposed Project as identified in the EIR. The MMP for the Proposed Project will be in place through all phases of the Proposed Project, including design (pre-construction), construction, and operation (post-construction both prior to and post-occupancy). SMCCD shall be responsible for administering the MMP activities or delegating them to staff, other responsible agencies, consultants, or contractors. SMCCD will also ensure that monitoring is documented through reports (to the extent required) and that deficiencies are promptly corrected. The designated environmental monitor (e.g. project contractor, certified professionals, etc.) will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

B. Organization

Each mitigation measure (MM) is categorized by environmental topic area and corresponding number, with identification of:

- **Enforcement Agency:** the agency with the power to enforce the MM.
- **Monitoring Agency:** the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase:** the phase of the Project during which the MM shall be monitored.
- **Monitoring Frequency:** the frequency at which the MM shall be monitored.
- **Action(s) Indicating Compliance:** the action(s) by which the Enforcement or Monitoring Agency indicates that compliance with the required MM has been implemented

C. Mitigation Monitoring Program

A. AESTHETICS

AES-MM-1 The Project contractors shall ensure the perimeter of active construction areas are securely fenced off and screened from public view. Perimeter fencing shall provide a visual barrier to effectively block the line of sight from the pedestrian viewshed. Fencing and plywood barriers, if used, shall be periodically inspected for graffiti and illegal postings.

- **Enforcement Agency:** SMCCD
- **Monitoring Agency:** SMCCD
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Throughout construction activities
- **Action(s) Indicating Compliance:** Field inspection sign-off

G. NOISE

NOI-MM-1 **Phase 1 – Police Headquarters.** Temporary construction sound barriers shall be erected along the eastern, western, and southern boundaries of the Campus Police Headquarters site prior to demolition and remain in place throughout construction activities. The construction sound barriers shall be a minimum of 8 feet in height and designed to provide a minimum 5 dBA reduction in noise level at Sensitive Receptors 1, 2, and 3.

Alternatively, the Applicant may utilize other means and methods to ensure the construction activities do not exceed 20 dBA L_{eq} during construction activities. Such means and methods may include but are not limited to installing temporary noise shields or baffles around heavy duty construction equipment, limiting the number of pieces of heavy-duty equipment operating within the same time and space, and minimizing construction noise activity levels to the maximum extent feasible.

- **Enforcement Agency:** SMCCD
- **Monitoring Agency:** SMCCD
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Throughout construction activities
- **Action(s) Indicating Compliance:** Field inspection sign-off

NOI-MM-2 Phase 3 – Pearl Street Replacement Buildings. Temporary construction sound barriers shall be erected along the eastern, western, and southern boundaries of the Pearl Street Replacement Buildings prior to demolition and will remain in place throughout construction activities. The construction sound barriers shall be a minimum of 8 feet in height and designed to provide a minimum 5 dBA reduction in noise level at Sensitive Receptors 1 and 3.

Alternatively, the Applicant may utilize other means and methods to ensure the construction activities do not exceed 20 dBA L_{eq} during construction activities. Such means and methods may include but are not limited to installing temporary noise shields or baffles around heavy duty construction equipment, limiting the number of pieces of heavy-duty equipment operating within the same time and space, and minimizing construction noise activity levels to the maximum extent feasible.

- **Enforcement Agency:** SMCCD
- **Monitoring Agency:** SMCCD
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Throughout construction activities
- **Action(s) Indicating Compliance:** Field inspection sign-off

NOI-MM-3 Phase 3 - Art Complex and Welcome Lawn. Temporary construction sound barriers shall be erected along the eastern boundary of the Art Complex construction site during building demolition and surface grading activities. The construction barrier shall be a minimum of 8 feet in height and designed to provide a minimum 5 dBA reduction in noise at Sensitive Receptor 13.

Alternatively, the Applicant may utilize other means and methods to ensure the construction activities do not exceed 20 dBA L_{eq} during construction activities. Such means and methods may include but are not limited to installing temporary noise shields or baffles around heavy duty construction equipment, limiting the number of pieces of heavy-duty equipment operating within the same time and space, and minimizing construction noise activity levels to the maximum extent feasible.

- **Enforcement Agency:** SMCCD
- **Monitoring Agency:** SMCCD
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Throughout construction activities
- **Action(s) Indicating Compliance:** Field inspection sign-off

NOI-MM-4 On-Site Sensitive Receptors. The following measures shall be implemented to reduce potential impacts to on-site noise sensitive receptors.

- During the active construction periods, equipment and trucks used for construction shall utilize the best available noise control techniques (e.g., improved mufflers, intake silencers, ducts, engine enclosures, acoustically attenuating shields or shrouds) wherever feasible.
- Stationary equipment such as generators and air compressors, construction staging areas, and material stockpiling area should be located as far away from on-site instructional areas as feasible.
- Temporary sound walls and/or acoustic blankets shall be installed as necessary to block the line-of-sight between the sensitive receptor and the noise source to ensure an interior noise level of 50 dBA or lower is achieved for any occupied interior classroom spaces.

- **Enforcement Agency:** SMCCD
- **Monitoring Agency:** SMCCD
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Throughout construction activities
- **Action(s) Indicating Compliance:** Field inspection sign-off