SANTA MONICA COLLEGE
2024 MAIN CAMPUS MASTER PLAN UPDATE
DRAFT 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

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I. EXECUTIVE SUMMARY

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (Draft EIR) contains a brief summary of the Santa Monica College 2024 Main Campus Master Plan Update (Proposed Project) and its potential environmental effects, along with a listing of the recommended mitigation measures for each of the environmental topics addressed in Section IV, Environmental Impact Analysis of this Draft EIR. Also included herein is a brief discussion of areas of controversy; a description of the public review process to date for the Proposed Project; and a summary of the alternatives to the Proposed Project evaluated in this Draft EIR.

A. PURPOSE OF THIS DRAFT EIR

The purpose of this Draft EIR is to inform decision makers and the general public of the potential environmental impacts resulting from the Proposed Project.

The Proposed Project will require approval of certain discretionary actions by the Santa Monica Community College District (SMCCD or SMC), and therefore, is subject to environmental review requirements under CEQA. For purposes of complying with CEQA, the SMCCD is identified as the Lead Agency for the Proposed Project.

As described in Section 15121(a) and 15362 of the CEQA Guidelines, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to mitigate any significant environmental effects, and identify and evaluate a reasonable range of alternatives to the project that have the potential to mitigate or avoid the project's potential significant environmental effects while feasibly accomplishing most of the project's basic purposes. Therefore, the intent of this Draft EIR is to focus the discussion on the Proposed Project's potential physical effects on the environment, which may be significant under the methodology and thresholds of significance identified in CEQA Guidelines Section 15064. Where applicable, the Draft EIR recommends feasible mitigation measures that could potentially reduce or avoid significant environmental impacts.

This Draft EIR was prepared in accordance with Section 15151 of the CEQA Guidelines, which defines the standards for adequacy of an environmental impact report as follows:

> *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

B. DRAFT EIR FOCUS AND EFFECTS NOT FOUND TO BE SIGNIFICANT

1. Notice of Preparation/Scoping Meeting

In compliance with Section 15082 of the CEQA Guidelines, a Notice of Preparation (NOP) was prepared by the SMCCD and distributed to the State Clearinghouse, Governor's Office of Land Use and Climate Innovation, responsible agencies, and other interested parties on January 9, 2025. The NOP and Notice of a Public Scoping Meeting was circulated for public review and comments for a 30-day period beginning on January 9, 2025 and ending on February 10, 2025. Appendix A to this Draft EIR contains a copy of the NOP and the CEQA Initial Study Environmental Checklist, respectively.

A Public Scoping Meeting was held on January 30, 2025 to obtain the public's initial views about environmental issues that should be evaluated in the Draft EIR in connection with the Proposed Project. The NOP, agency and public response letters to the NOP and Initial Study Checklist are contained in Appendix A and B to this Draft EIR.

2. Issues Analyzed in the Draft EIR

Based on a review of environmental issues covered in the Initial Study (IS), the public and agency comments on the IS/NOP, and the input received at the public scoping meeting held on January 30, 2025, this Draft EIR addresses the potential for significant impacts and analyzes the following environmental issues:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise

The SMCCD determined through the Initial Study that the Proposed Project would not have the potential to cause significant impacts related to some environmental issues. Therefore, the following environmental issues are not analyzed in this Draft EIR.

- Agricultural and Forestry Resources
- Biological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

3. Organization of the Draft EIR

The Draft EIR is organized into eight sections as follows:

- **Section I (Executive Summary):** This section describes the purpose of the Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, areas of controversy and issues to be resolved, public review process, a summary of the project description, alternatives, environmental impacts, proposed PDFs, and mitigation measures.

- **Section II (Project Description):** This section provides a complete description of the proposed action including the Project's location, existing Project Site uses and environmental setting, Project characteristics, a statement of the Project's objectives, and required discretionary actions.

- **Section III (Environmental Setting):** This section provides an overview of the environmental setting of the Proposed Project is provided including a description of existing and surrounding land uses, and a list of related projects.

- **Section IV (Environmental Impact Analysis):** This section is the primary focus of the Draft EIR. Each environmental issue addressed within this chapter contains a discussion of the regulatory setting, existing baseline conditions, an analysis of the environmental impacts that are anticipated to occur as a result of the Project, mitigation measures capable of avoiding or reducing the Project's significant environmental impacts, an analysis of cumulative impacts, and the level of impact significance after mitigation.

- **Section V (Alternatives to the Project):** This section includes an analysis of a range of reasonable alternatives to the Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the Project and alternatives that would avoid or substantially lessen any of the significant effects of the Project. The Alternative Analysis includes the following development scenarios:

    - Alternative 1 – No Project Alternative

    - Alternative 2 – Reduced Density Alternative

- **Section VI (Other CEQA Considerations):** This section provides a summary of significant and unavoidable impacts of the Project, a summary of the impacts scoped out by the Initial Study, a discussion of potential growth inducing effects, and an explanation of the significant irreversible environmental changes.

- **Section VII (Preparers and Persons Consulted):** This section presents a list of City staff and consultant team members that contributed to the preparation of the Draft EIR.

- **Section VIII (References and Acronyms):** This section lists the references and sources, as well as the acronyms and abbreviations used in this Draft EIR.

Additionally, the Draft EIR includes technical appendices that include the NOP, public and governmental agency comment letters on the NOP, and various detailed analyses, reports, calculation worksheets and correspondences from various agencies and service providers involved in reviewing aspects of the Project.

4. Description of the Project

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. More detailed descriptions of the Project's architectural design, open space, landscaping, access/circulation, sustainability features, and construction schedule are provided in Section II, Project Description, of this Draft EIR.

5. Necessary Approvals

a) Lead Agency

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the "Lead Agency".[1] For purposes of the Project, the SMCCD is the primary governmental agency responsible for approving the Project and therefore constitutes the Lead Agency. The SMC Board of Trustees is the decision-making body of the District.

Discretionary approvals anticipated at this time could include, but are not limited to certification of this EIR, potential adoption of a statement of overriding considerations, final approval of the 2024 Main Campus Master Plan Update by the SMC Board of Trustees, and a potential vote to override municipal zoning. Other governmental approvals, as may be necessary, will be pursued in accordance with all applicable laws and regulations. SMC will be required to submit building plans to the Division the State Architect for structural safety, access compliance, and fire and life safety approvals.

Other discretionary and ministerial permits and approvals that may be deemed necessary, may include temporary street closure permits, and/or utility relocations and new service connections.

b) Other Public Agencies

As part of its environmental review, the Lead Agency consults with other public agencies that retain jurisdiction by law over natural resources affected by the Project. Such agencies that may review the EIR include, but are not limited to the following:

- Regional Water Quality Control Board, Los Angeles Region
- South Coast Air Quality Management District

6. Areas of Controversy

Potential areas of controversy and issues to be resolved by SMC'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.

[1] *State CEQA Guidelines Section 15367.*

7. Environmental Review Process

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. 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. The public comment period begins on July 24, 2025, and will end on September 8, 2025.

After completion of the 45 day review period, a Final EIR will be prepared that responds to written comments on the Draft EIR submitted during the review period and modifies the Draft EIR as may be required. Public hearings on the Project will be held after completion of the Final EIR. The SMCCD will make the Final EIR available to agencies and the public prior to considering certification of the Final EIR. Notice of the time and location will be published prior to the public hearing date.

C. SUMMARY OF PROJECT IMPACTS AND MITIGATION MEASURES

Table I-1 on the following pages summarizes the various environmental impacts associated with the construction and operation of the Project. Mitigation measures are proposed for potentially significant environmental impacts, and the level of impact significance after mitigation is also identified.

Table I-1
Summary of Project Impacts and Mitigation Measures

Environmental Issue	Mitigation Measures (MMs)	Level of Significance After Mitigation
IV.A AESTHETICS		
Threshold a) Would the Project have a substantial effect on a scenic vista? 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.
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? 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 such, the Proposed Project would have no impact related to scenic resources within a scenic highway.	None.	No Impact.

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? ***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 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	**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.

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.		
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? ***Construction*** 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. ***Operation*** 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 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	None	Less Than Significant.

shade and shadow impacts would be less than significant.		
IV.B AIR QUALITY		
Threshold (a) Would the Project conflict with or obstruct implementation of the applicable air quality plan? ***Consistency with 2022 Air Quality Management Plan (AQMP)*** 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 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.	None	Less Than Significant.

Consistency with SMC Air Quality-Related Programs and Policies 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.		
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? ***Regional Construction Impacts*** The peak daily regional emissions generated for reactive organic gases (ROG), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter greater than 10 microns in diameter (PM_{10}) and particulate matter greater than 2.5 microns in diameter ($PM_{2.5}$) during the construction phases of the Proposed Project would not	None	Less Than Significant.

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. ***Regional Operational Impacts*** 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. A 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.		
Threshold (c) Would the project expose sensitive receptors to substantial pollutant concentrations? ***Localized Construction Air Quality Impacts*** The closest receptor distance provided in the SCAQMD's Mass Rate Localized Significance Threshold (LST) Look-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	None	Less Than Significant.

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. ***Localized Operational Air Quality Impacts*** 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		
Threshold (a) Would the Project cause a substantial adverse change in significance of a historical resource pursuant to Section 15064.5? The Proposed Project includes the demolition of existing temporary and permanent buildings, totaling approximately	None	Less Than Significant.

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.		
Threshold (b) Would the Project cause a substantial adverse change in the significance of an 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	None	Less Than Significant.

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 remains, including those interred outside of dedicated cemeteries? 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	None	Less Than Significant.

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		
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? ***Construction*** 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 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	None	Less Than Significant.

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.		
Threshold (b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? 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, 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.	None	Less Than Significant.

IV.E GREENHOUSE GAS EMISSIONS		
Threshold (a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	None	Less Than Significant.
Threshold (b) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	None	Less Than Significant.
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 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.		
Consistency with the Climate Change Scoping Plan		
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. ***Consistency with SCAG 2020-2045 RTP/SCS and 2024-2050 RTP/SCS*** 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.		

SMC Board of Trustees – Climate Change Goals and Policies 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. ***Construction Emissions*** 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 $MTCO_2e$. The total construction emissions are amortized over 30 years and are incorporated into the Proposed Project's annualized operational emissions. Thus, the 4,462 $MTCO_2e$ of construction emissions equates to 149 $MTCO_2e$ per year during the life of the Proposed Project.		

Operational Emissions 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		
Threshold (a): Would the project physically divide an established community? 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
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? ***Consistency with the 2020-2045 RTP/SCS*** The Proposed Project would be consistent with applicable goals of the 2020-2045 RTP/SCS. The Project Site is located in a 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 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 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	None	Less Than Significant.

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.		

Consistency with the City of Santa Monica General Plan 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. ***Consistency with the City of Santa Monica Zoning Code*** 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		
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 Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ***Construction Noise Impacts*** *On-Site Construction Noise* 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.	**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.	Less Than Significant with Mitigation.

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. *Off-Site Haul Truck Construction Noise* 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 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.	**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. **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,	

Operational Noise Impacts *Operational Roadway Noise* 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. *Outdoor Activity Noise Levels* 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.	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 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.	

Mechanical Equipment and HVAC Noise Levels 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 ambient noise levels at the sensitive receptors. As such, noise impacts from mechanical equipment would be less than significant.		
Threshold (b): Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels? ***Construction Impacts*** *On-Site Construction Vibration* 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	None	Less Than Significant.

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. *Off-Site Construction Vibration* 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 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.		

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II. PROJECT DESCRIPTION

A. PROJECT SUMMARY

The Proposed Project consists of the adoption and implementation of the Santa Monica College (SMC) 2024 Main Campus Master Plan Update ("Proposed Project") by the Santa Monica Community College District (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.

Based on an evaluation by licensed professionals and industry standards, and the evolution of postsecondary educational programs, a number of existing buildings on the SMC Main Campus appear to be outdated or past their useful lives and should be replaced. The 2024 Main Campus Master Plan Update would include the demolition of certain 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) ("Proposed 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. ENVIRONMENTAL SETTING

1. Project Location

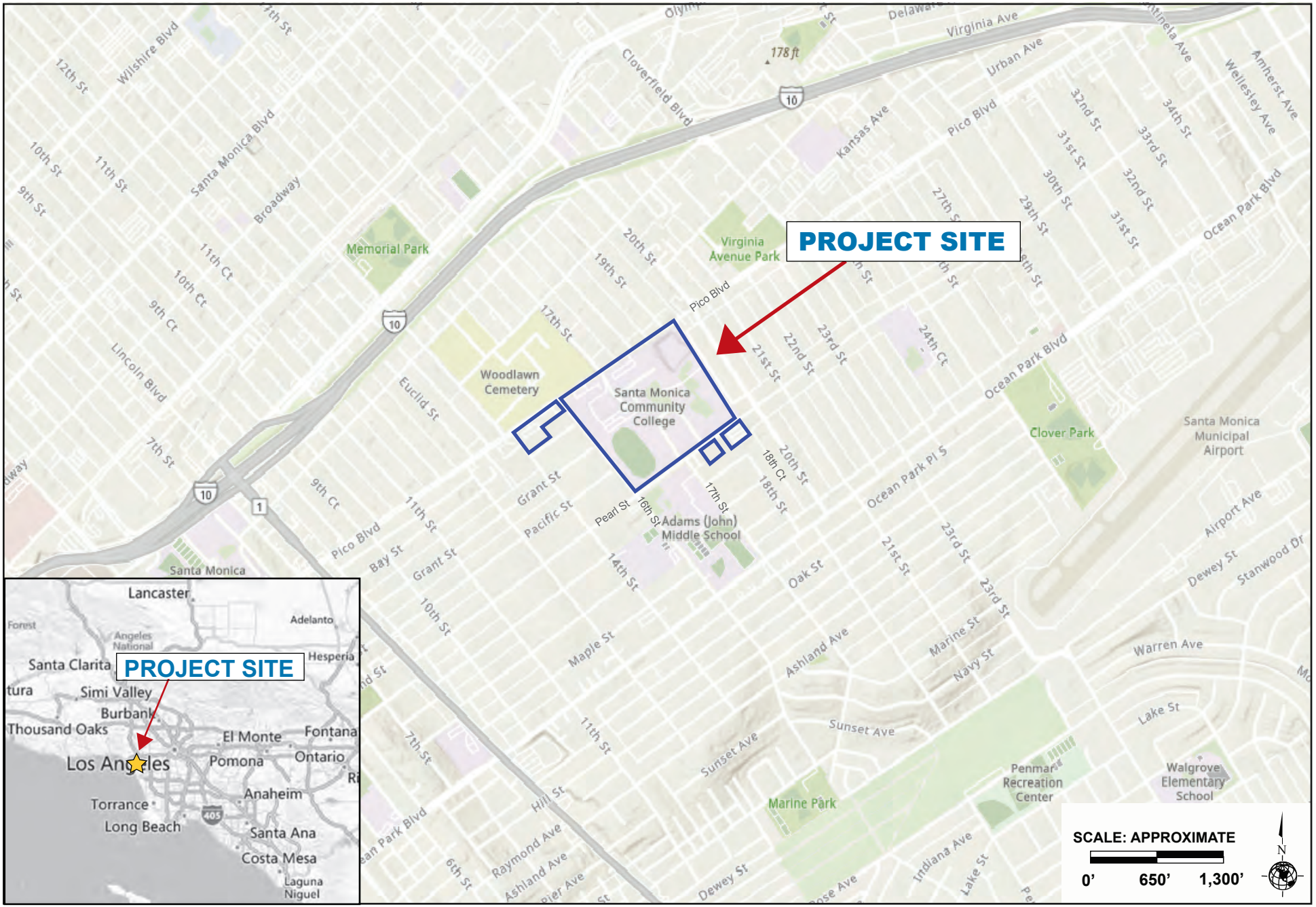
The Project Site includes SMC's Main Campus, located at 1900 Pico Boulevard[1] in the City of Santa Monica, CA. Santa Monica College's Main Campus encompasses approximately 43.98 acres generally bounded by Pico Boulevard to the north, 18th Court to the east, Pearl Street to the south, and 16th Street 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"). A summary of the Project Site's property addresses, Los Angeles County Assessor's Parcel Numbers (APNs), and associated lot areas are summarized in Table II-1, Summary of Project Site Area, below. The location of the Project Site is depicted Figure II-1, Project Location Map, on page II-3.

Table II-1
Summary of Project Site Area

Property Addresses	APN	Existing Land Use	Lot Area	
			(square feet)	(acres)
1702 Pico Boulevard	4273-001-908	SMC Main Campus	1,735,195	39.82
1530 Pico Boulevard 1516 Pico Boulevard	4284-034-905 4284-034-901	SMC Foundation and surface parking	15,940	0.37
1510 Pico Boulevard	4284-034-902	SMC Facilities Planning	9,820	0.23
1410 Pico Boulevard 2019 14th Street 2023 14th Street	4284-034-900 4284-034-904 4284-034-903	SMC Art Complex	71,860	1.65
1714 Pearl Street 1718 Pearl Street	4273-022-901 4273-022-900	SMC Campus Police Buildings A and B	13,000	0.30
1724 Pearl Street	4273-022-902	SMC Campus Police Annex	6,500	0.15
1734 Pearl Street	4273-022-903	SMC Campus Events	6,500	0.15
1738 Pearl Street	4273-022-905	SMC Auxiliary Services	6,500	0.15
1744 Pearl Street	4273-022-904	SMC Environmental Center and Greenhouse	7,765	0.18
NA	4273-021-901	SMC Parking Lot 5	42,550	0.98
		Total	**1,915,630**	**43.98**

Source(s):
City of Santa Monica, SaMoMAP, website: https://samomap.santamonica.gov, accessed December 2024; Los Angeles County Assessor map page, Main Campus, website: https://maps.assessor.lacounty.gov/Geocortex/Essentials/PAIS/REST/sites/PAIS/VirtualDirectory/AssessorMaps/ViewMap.html?val=4273-001; Pico Boulevard additional properties, website: https://maps.assessor.lacounty.gov/Geocortex/Essentials/PAIS/REST/sites/PAIS/VirtualDirectory/AssessorMaps/ViewMap.html?val=4284-034; Pearl Street additional properties, website: https://maps.assessor.lacounty.gov/Geocortex/Essentials/PAIS/REST/sites/PAIS/VirtualDirectory/AssessorMaps/ViewMap.html?val=4273-022, accessed December 2024.

[1] 1900 Pico Boulevard is the SMC Main Campus' primary address. For a list of all of the property addresses associated with the Main Campus, see Table II-1, Summary of Project Site Area.



Source: ArcGIS Maps, 2023.

Figure II-1
Project Location Map

As noted above, the Project Site is located within the City of Santa Monica. The Main Campus area bounded by Pico Boulevard to the north, 18th Court to the east, Pearl Street to the south, and 16th Street to the west is zoned PL – Institutional / Public Lands and has a Land Use and Circulation Element (LUCE) General Plan land use designation of Institutional / Public Lands. The properties along the south side of Pico Boulevard between 14th Street and 16th Street are zoned NC - Neighborhood Commercial and R1 - Single Unit Residential with corresponding General Plan land use designations of Neighborhood Commercial and Single Family Housing. The properties on the south side of Pearl Street are zoned R1 - Single Unit Residential with a corresponding General Plan land use designation of Single Family Housing. Figure II-2, Zoning and General Plan Land Use Designations, shows the existing land use designation on the Project Site and in the surrounding area.

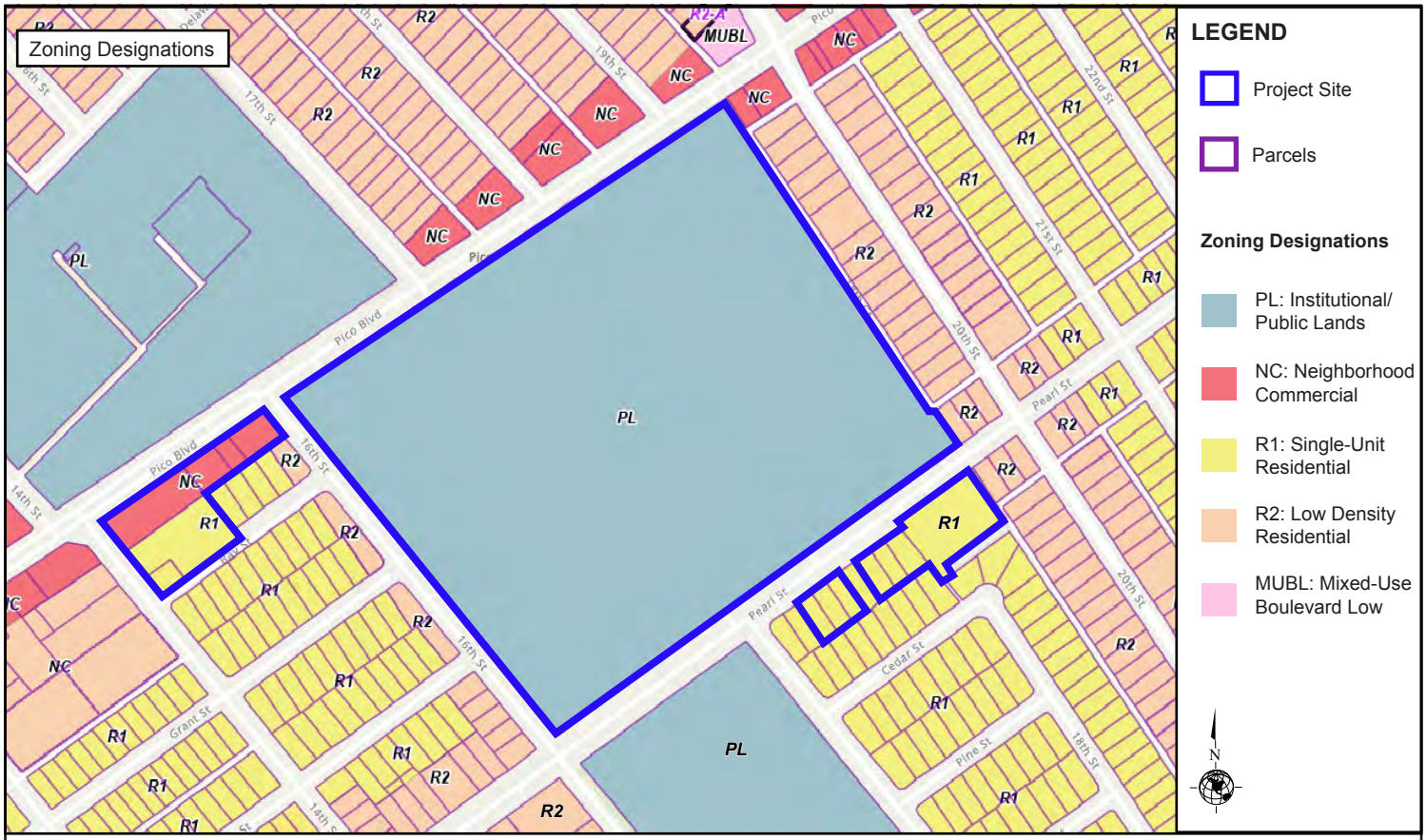
2. Regional and Local Access

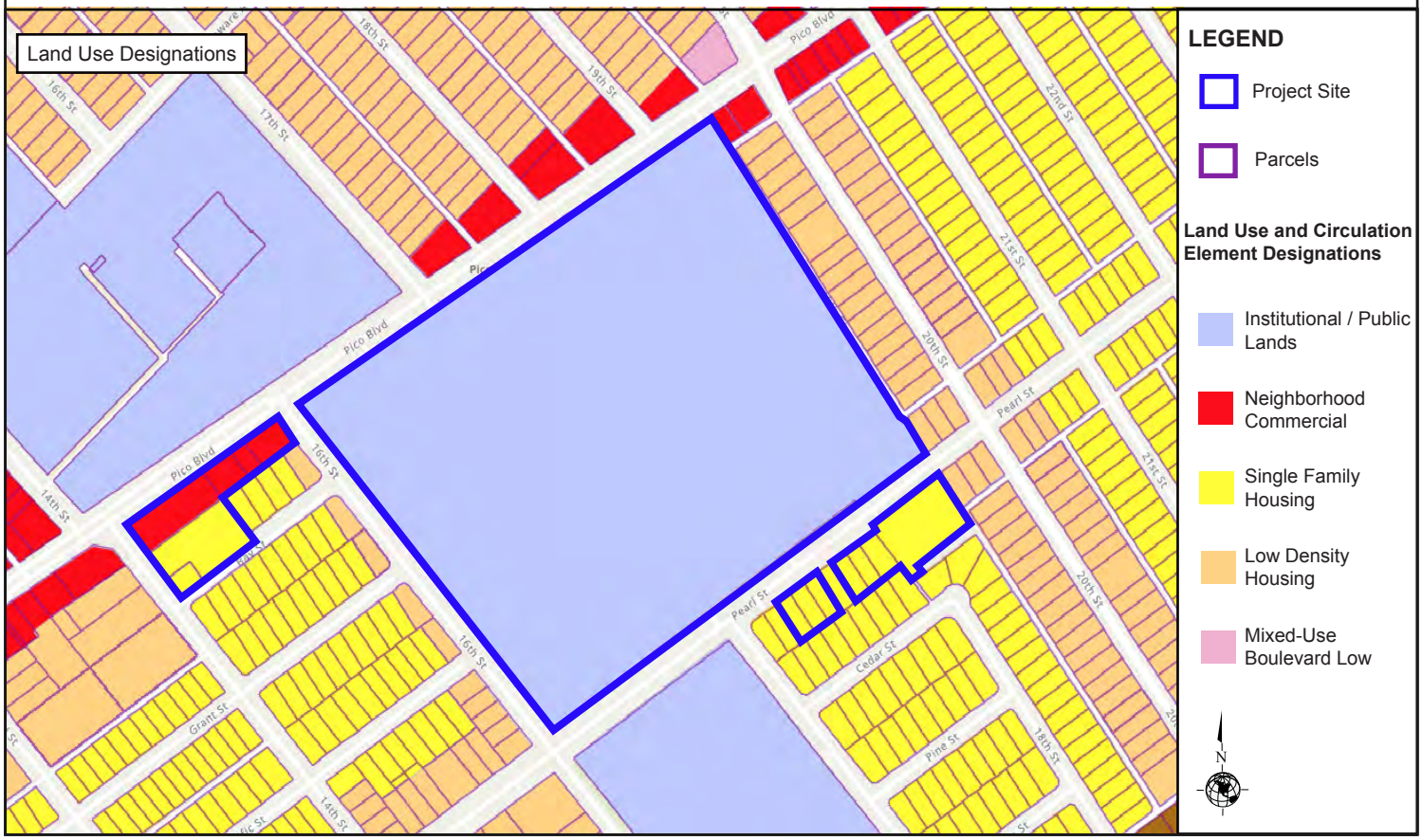
a) Regional Access

Regional access to the Project Site is provided by the Santa Monica Freeway (I-10). The Santa Monica Freeway generally runs in an east-west direction approximately 0.4 mile to the north of the Project Site. Regional access to the Project Site is also provided by the San Diego Freeway (I-405). The San Diego Freeway generally runs in a north-south direction approximately 2.8 miles to the east of the Project Site.

b) Local Access

Local street access to the Project Site is provided by Pico Boulevard, Pearl Street, 18th Court, and 16th Street. Pico Boulevard is a two-way street providing two travel lanes in each direction. Street parking is predominately restricted along Pico Boulevard adjacent to the Project Site, with the exception of minimal metered parking spaces. Pearl Street is a two-way street providing one travel lane in each direction. Street parking is provided along the north and south sides of Pearl Street. There is one designated bike lane on the south side of the street. 18th Court is a two-way alley providing access to residential parking spaces for the residences fronting 20th Street. 16th Street is a two-way street providing one travel lane in each direction with metered street parking on the east side of the street and permit only parking on the west side of the street. There is one designated bike lane on the east side of the street.





Source: SaMoMAP, City of Santa Monica, Department of City Planning, 2023.

Figure II-2
Zoning and General Plan Land Use Designations

c) Project Site Access

As shown in Figures II-3 and II-4, vehicular access to the SMC Main Campus is provided from driveways along Pico Boulevard, 16th Street, and Pearl Street. The existing site driveways provide access to and from the parking structures and surface parking lots.

Along Pico Boulevard there is one separate ingress driveway to enter Parking Structure 4, located at the corner of Pico Boulevard and 16th Street, and one separate egress driveway to exit Parking Structure 4. Additionally, there is a one-lane ingress and two-lane egress driveway at the intersection of Pico Boulevard and 17th Street which provides access to Parking Structure 3. There is another ingress/egress driveway providing access to a surface parking lot along Pico Boulevard. There is an additional one-lane ingress and two-lane egress driveway along Pico Boulevard to provide access to the subterranean parking structure under the Student Services Center. There is one ingress/egress driveway along Pico Boulevard which provides access to the surface parking lot along the eastern border of the SMC Main Campus, along the north side of Pearl Street.

Along 16th Street there are four authorized personnel only ingress/egress driveways and one egress only driveway to exit the parking structure located at the corner of Pico Boulevard and 16th Street.

Along Pearl Street there is one ingress/egress driveway which provides access to the surface parking lot along the eastern border of the SMC Main Campus. There are three additional ingress/egress driveways for authorized personnel only.

Vehicular access to the additional properties located along Pico Boulevard is provided from an ingress/egress driveway along 16th Street, three ingress/egress driveways along Pico Boulevard, and one ingress/egress driveway along 16th Street.

Vehicular access to the additional properties located along Pearl Street is provided from six driveways along the south side of Pearl Street. There is one ingress/egress driveway which provides access to a surface parking lot on the south side of Pearl Street.

d) Public Transit

The Main Campus is supported by an extensive network of bus and light rail connections. The Project Site is served by bus lines operated by the City of Santa Monica's Big Blue Bus (BBB). Specifically, a total of six bus lines serve the Project Site and nearby area, including BBB local lines 7, 8, 16, 42, 44, and Rapid 7. These lines serve Santa Monica and the greater Los Angeles area and have stops located adjacent to the Project Site along Pico Boulevard and 20th Street. Additionally, Los Angeles County Metropolitan Transportation Authority's (Metro's) 17th Street Station at 17th Street and Colorado provides access to Metro's E Line. The 17th Street Station is located 0.7 miles to the north of the Project Site.

Ridership for SMC students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro.

3. Existing Uses

The SMC Main Campus is currently developed with 1,065,931 square feet of existing gross floor area (655,278 assignable square feet (asf)),[2] and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. A detailed inventory of the existing buildings and facilities is provided in Table II-2, Existing Development On-Site (2025 Baseline). Figure II-3, Existing Development On-Site, provides a building location map. Figure II-4, Aerial Photograph of the Project Site and Surrounding Land Uses, provides an aerial image of the existing conditions on-site and within the surrounding neighborhood.

As shown in Figure II-4, Aerial Photograph of the Project Site and Surrounding Land Uses, there are currently two ongoing building projects on the Project Site that are currently under construction. These active projects include Building 9, the new Math and Science building, which is expected to open by late 2024 and the new Art Replacement building (labeled as Building TBD in Table II-2 and Figure II-3), which is expected to open by late 2025. The environmental analysis in this EIR assumes a 2025 baseline for existing uses on the Project Site, which includes completion and full buildout of these two ongoing projects.

Including the two ongoing projects discussed above, there are a total of 2,860 vehicle parking spaces located in a combination of above grade and below grade parking structures and surface parking lots. A summary of the existing parking inventory is provided in Table II-3, Existing Parking Inventory, below. A location map depicting the location and access points to the existing on-site parking is provided in Figure II-5, Existing Parking Locations and Quantities.

As shown in Figure II-4, Aerial Photograph of the Project Site and Surrounding Land Uses, there are currently two ongoing building projects on the Project Site that are currently under construction. These active projects include Building 9, the new Math and Science building, which is expected to open by late 2024 and the new Art Replacement building (labeled as Building TBD in Table II-2 and Figure II-3), which is expected to open by late 2025. The environmental analysis in this EIR assumes a 2025 baseline for existing uses on the Project Site, which includes completion and full buildout of these two ongoing projects.

[2] The term "assignable square footage or "(asf)" is defined as usable square footage within a physical space (measured from finished wall to finished wall). The term "gross square footage" (or "gsf") is defined as the square footage that includes all unusable space within a building (i.e., corridors, custodian closets, inside walls, utility spaces, etc.).

Table II-2
Existing Development On-Site (2025 Baseline)

Bldg #	Land Uses	Floor Area	
		ASF	GSF
1	Pico Classroom Complex	12,175	18,014
3	Art Complex	15,065	22,127
5	Maintenance and Operation (M&O) Extension [a]	4,811	6,450
6	Business	36,332	53,772
7	Greenhouse	1,188	1,470
8	Gymnasium	32,628	48,618
9	New Math & Science [b]	69,565	110,991
12	Library & Media Center	78,020	108,673
13	Theater Arts	13,609	27,423
14	Core Performance Center	28,736	53,333
17	Math Complex	27,308	44,872
18	Stadium Shops / Facilities Offices	17,043	23,236
19	Student Health & Activities [c]	42,882	59,644
20	Life & Physical Sciences Complex	56,801	98,400
21	Humanities & Social Science	35,180	65,747
22	Drescher Hall	64,761	111,145
23	Pico Village	8,190	8,640
26	Campus Events	1,206	1,600
27	Campus Police B	1,111	1,400
27	Campus Police A	1,310	1,990
28	Campus Police Annex	1,877	2,000
28	Campus Police Sub-Annex	1,073	1,504
29	Environmental Center	959	1,400
30	Auxiliary Services	1,685	1,890
32	Pico Annex 1510	4,808	14,970
33	Pico Annex 1516	1,939	2,825
44	Faculty Village	1,177	1,920
45	Student Services Center	73,119	140,000
TBD	Art Replacement [b]	20,720	31,877
	Total	**655,278**	**1,065,931**

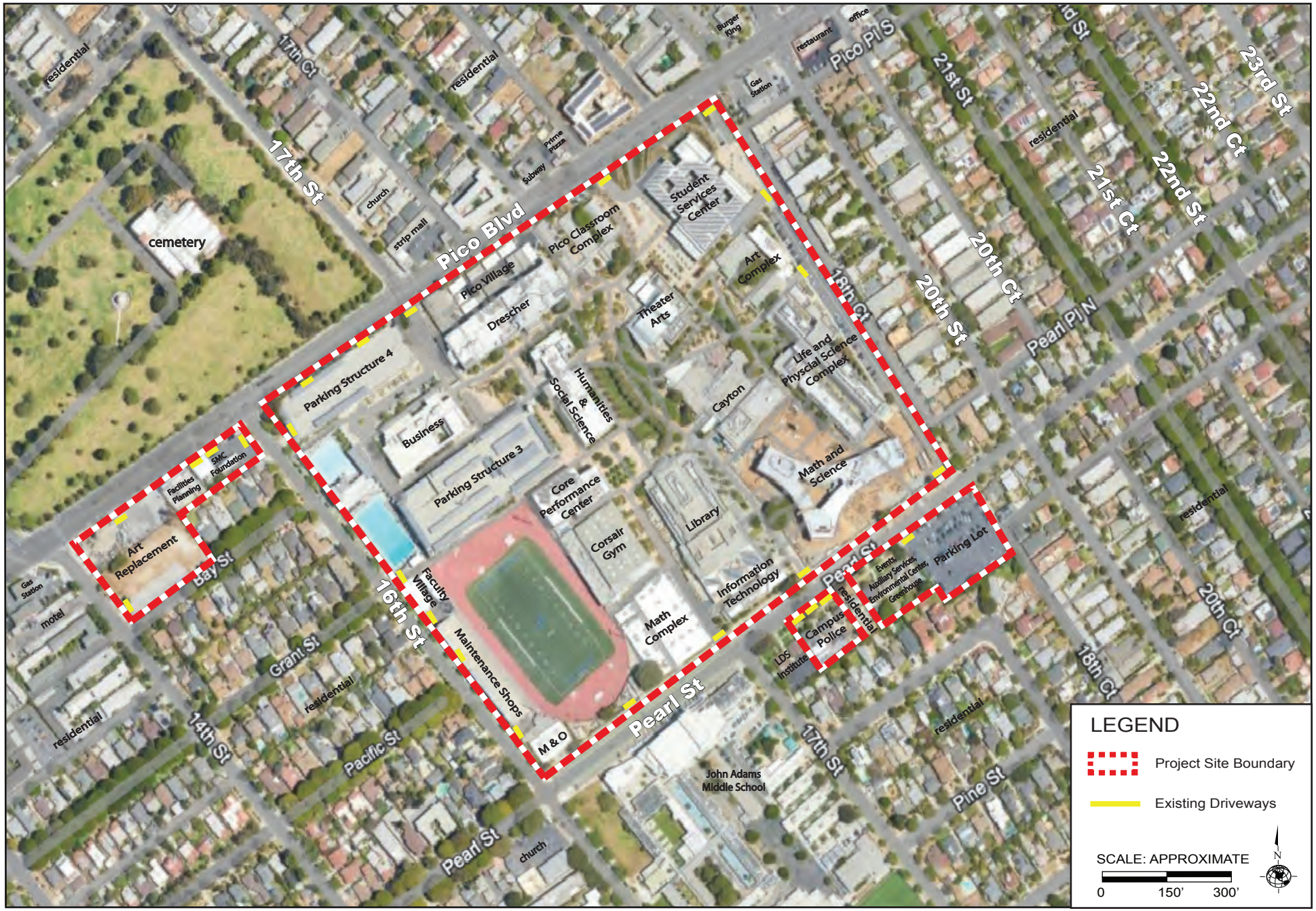
Notes: asf = assignable square feet, gsf = gross square feet.
[a] Formerly known as ESL.
[b] The 2025 Baseline conditions includes two projects that were under construction upon completion of this master plan report: Math and Science (9), which will open in late 2024 and the Art Replacement (TBD) which is scheduled to open late 2025.
[c] Also known as the Cayton Center or as the Cafeteria.
Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.



Note: A corresponding inventory of the existing buildings and facilities is provided in Table II-2.

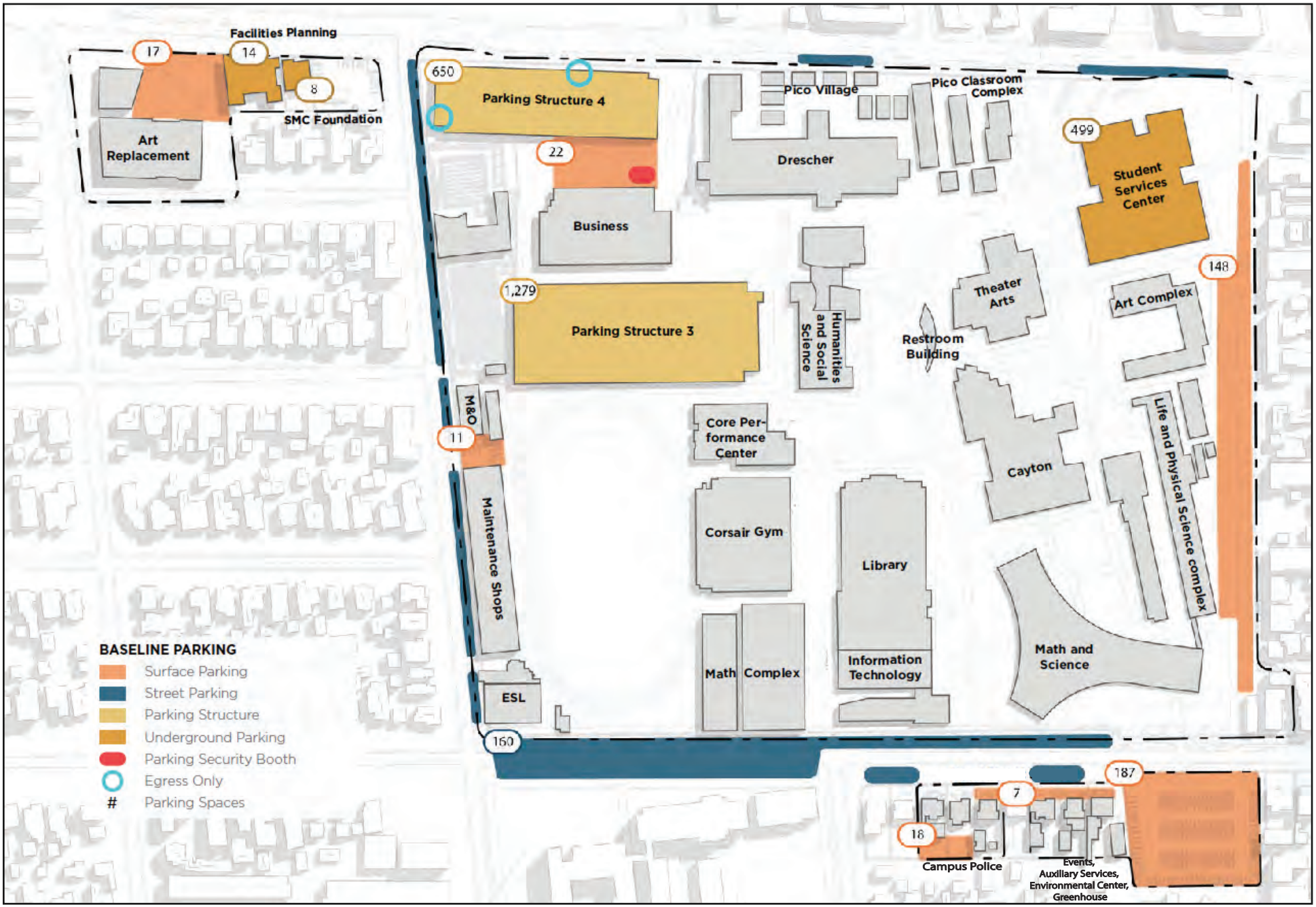
Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-3
Existing Development On-Site



Source: Google Earth, Aerial View, 2022.

Figure II-4
Aerial Photograph of the Project Site and Surrounding Land Uses



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-5
Existing Parking Locations and Quantities

Table II-3
Existing Parking Inventory

Parking Type	Location		Spaces
Parking Structures	Parking Structure 2		499
	Parking Structure 3		1,279
	Parking Structure 4		650
Surface Parking	North of Pearl Street	Lot 1	148
		North of Business	22
		Facilities	11
		1510 Pico (Facilities Planning)	14
		1516 Pico (SMC Foundation)	8
		Art Replacement	17
	South of Pearl Street	Lot 5	187
		Campus Police	18
		Individual Lots	7
		Total	**2,860**

Vegetation on the Main Campus consists of ornamental landscaping that includes trees, turf, and shrubs, garden areas, and the Main Quad green space. Vegetation on the Pico Boulevard properties consists of ornamental landscaping that includes trees and shrubs fronting the surrounding roadways. Vegetation on the Pearl Street properties consists of ornamental landscaping that includes trees, turf, and shrubs fronting the surrounding roadways and rear yards.

4. Surrounding Uses

As shown in Figure II-4, the properties surrounding the Project Site include commercial, retail, institutional, and residential land uses. Below is a description of the existing conditions surrounding the Main Campus portion of the Project Site.

North: Abutting the Project Site to the north is Pico Boulevard. There are commercial and residential properties fronting Pico Boulevard, which are zoned Neighborhood Commercial (NC) with a corresponding LUCE land use designation of Neighborhood Commercial. Further north, are residential properties which are zoned R2 with a LUCE land use designation of Low Density Housing. Also to the north of the Project Site fronting Pico Boulevard is the Woodlawn Cemetery. This property is zoned PL with a LUCE land use designation of Institutional/Public Lands.

West: Abutting the Project Site to the west is 16th Street. Further west, past 16th Street, are residential properties. These properties are zoned R2 and R1 and have LUCE land use designations of Low Density Housing and Single Family Housing, respectively. Also west of the Main Campus are the SMC Pico Boulevard properties (Art Complex, Facilities Planning, the SMC Foundation, and associated parking). These properties are zoned NC and R1 and have LUCE land use designations of Neighborhood Commercial and Single Family Housing, respectively.

East: Abutting the Project Site to the east is 18th Court. Further east, past 18th Court, are residential properties zoned R2 with a LUCE land use designation of Low Density Housing. Also east of 18th Court are commercial properties zoned NC with a LUCE land use designation of Neighborhood Commercial.

South: Abutting the Project Site to the south is Pearl Street. Further south, past Pearl Street, are residential properties zoned R1 and have a LUCE land use designation of Single Family Housing. John Adams Middle School is also located south of the Project Site, and is zoned PL with a LUCE land use designation of Institutional/Public Lands. Additionally, the SMC Pearl Street properties and an SMC surface parking lot are located south of the Main Campus and are zoned R1 with a LUCE land use designation of Single Family Housing.

C. PROJECT OBJECTIVES

California Environmental Quality Act (CEQA) Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” CEQA Guidelines Section 15124(b) further states that “the statement of objectives should include the underlying purpose of the project.” The Santa Monica College Main Campus Master Plan 2024 Update (“2024 Campus Master Plan Update”) builds on and retains the objectives of the SMC Career and Educational Facilities Master Plan 2010 Update (“2010 Master Plan Update”) and additionally lists eight goals that were developed as a guide to physical planning of the Main Campus.

The 2010 Master Plan Update identifies the guiding principles and parameters for future development; promotes sustainability; makes provisions for a superior educational environment; identifies long-term planning goals for SMC facilities that assist the District in preparing students for careers in a global economy, including the teaching of specific curricula; and identifies program improvements for specific projects.

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.

D. DESCRIPTION OF THE PROJECT

1. Project Overview

The SMC 2024 Main Campus Master Plan Update proposes the demolition of approximately 360,100 gsf of existing temporary and permanent buildings, and the new construction of approximately 265,216 gsf (172,990 asf) of new development including the Pico 1 Building (76,474 gsf), the Pico 2 Building (99,742 gsf), a new police headquarters (12,000 gsf), a new student union (42,000 gsf), a new maintenance and operations facility (26,000 gsf), and replacement structures for the existing Pearl Street buildings which will be programmed at a later date (9,000 gsf). The Proposed Project would also include a total of 207,073 gsf of renovations to two existing buildings: the Physical and Life Science Complex, and the Library and Media Center. Table II-4, Proposed Development Summary, provides a detailed summary of the proposed land uses and floor area being demolished, constructed, and renovated, as part of the Proposed Project. Figure II-6 shows the structures proposed for demolition. Figure II-7 depicts the 2024 Main Campus Master Plan Update Concept Plan.

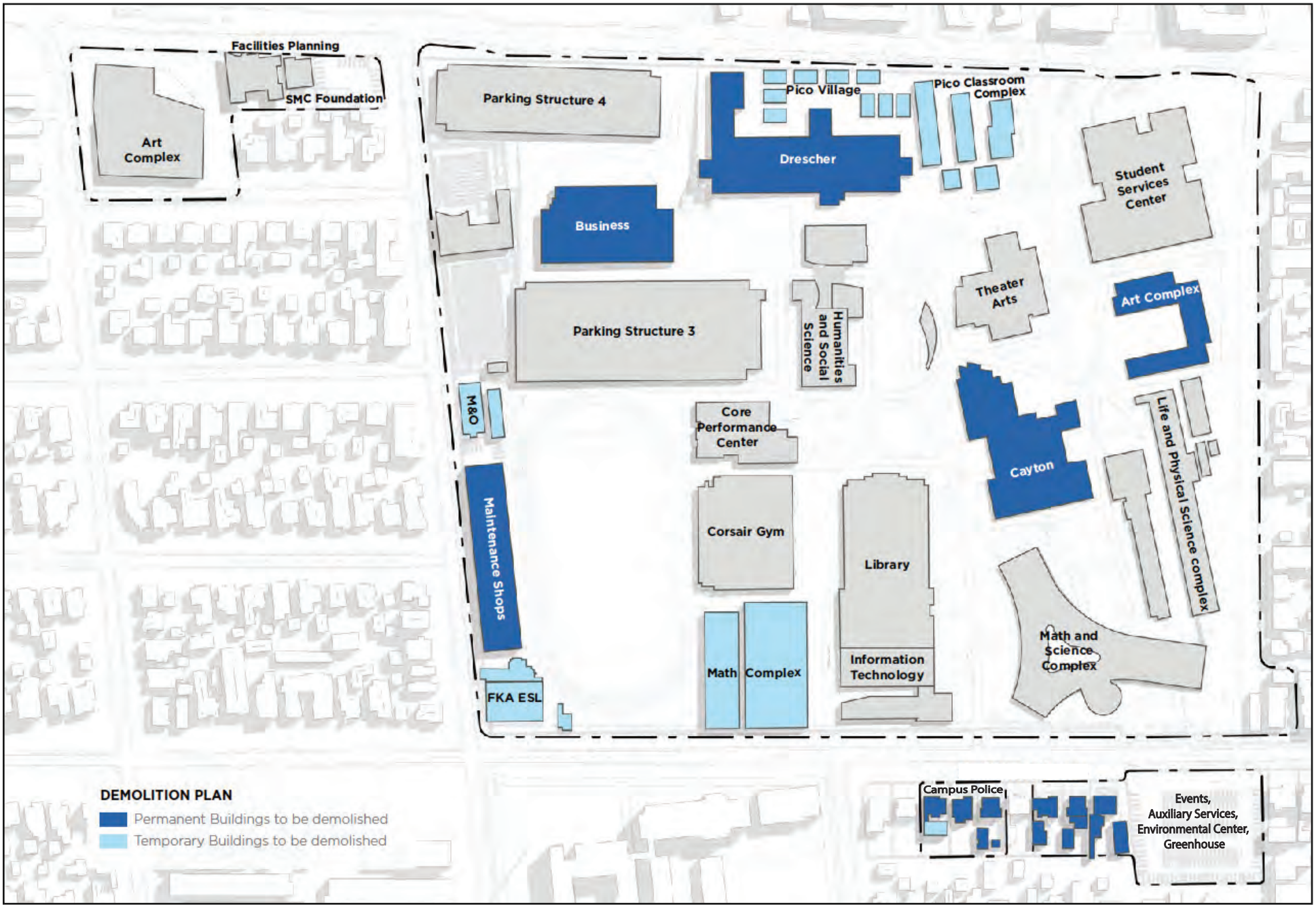
2. New Construction

The Proposed Project would consist of constructing five new major buildings on the Main Campus. The Pico 1, Business Replacement and Pico 2 Drescher Hall Replacement buildings will transform SMC's Pico Boulevard frontage, creating a welcoming front door to the campus and its edge with the local community. The proposed Business Replacement building will be located on the current site of the Pico Classroom Complex which will be demolished and will house critical services and programs for students in a prominent and visible location on campus. The Proposed Project will house academic departments currently located in the existing Business building such as Fashion, Cosmetology, Business and Commerce, Information Technology Lab, Accounting, Interdisciplinary Studies, and Photography Studios, as well as student-focused spaces that are currently housed in Cayton Center such as clubs, the Veteran's Resource Center, Associated Students, and the Equity Center.

Table II-4
Proposed Development Summary

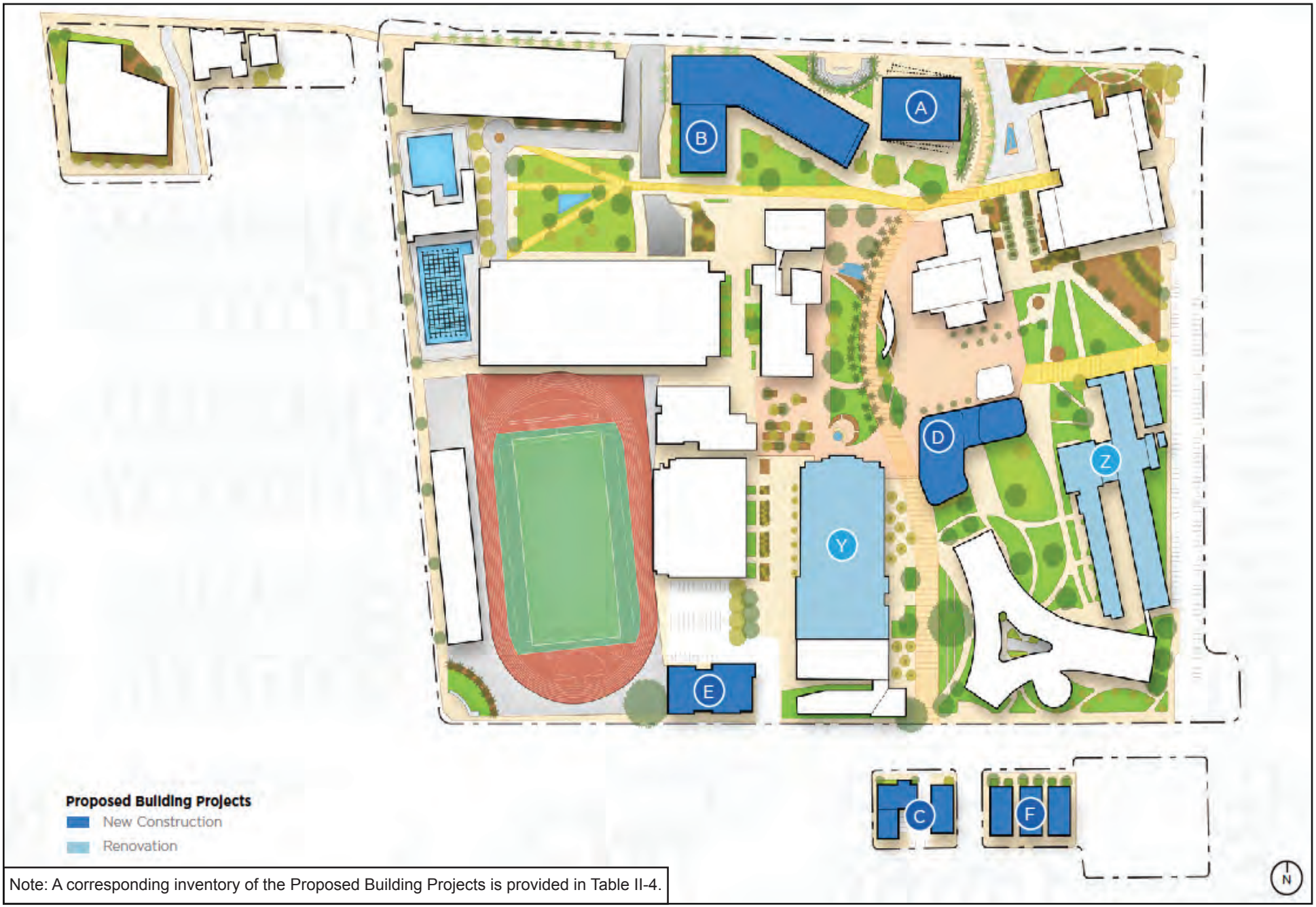
Bldg #	PHASES	ASF	GSF
	Proposed Demolitions		
1	Pico Classroom Complex	12,175	18,014
17	Math Complex	27,308	44,872
22	Drescher Hall	64,761	111,145
23	Pico Village	8,190	8,640
27	Campus Police A	1,111	1,400
27	Campus Police B	1,310	1,990
28	Campus Police Annex	1,877	2,000
44	Faculty Village	1,177	1,920
5	Maintenance and Operation (M&O) Extension	4,811	6,450
18	Stadium Shops / Facilities Offices	17,043	23,236
19	Student Health & Activities c	42,882	59,644
3	Art Complex	15,065	22,127
6	Business	36,332	53,772
26	Campus Events	1,206	1,600
29	Environmental Center	959	1,400
30	Auxiliary Services	1,685	1,890
	Total Demolition	**237,892**	**360,100**
	Proposed New Construction		
A	Pico 1 Business Replacement	49,708	76,474
B	Pico 2 Drescher Hall Replacement	64,832	99,742
C	Police Headquarters	8,400	12,000
D	Student Union	27,300	42,000
E	Maintenance and Operations	16,900	26,000
F	Pearl Street Replacements	5,850	9,000
	Total New Construction	**172,990**	**265,216**
	Proposed Renovation		
Z	Life & Physical Sciences Complex	56,801	98,400
Y	Library & Media Center	78,020	108,673
		134,821	**207,073**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-6
Proposed Demoliton Plan



Note: A corresponding inventory of the Proposed Building Projects is provided in Table II-4.

Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-7
2024 Main Campus Master Plan Update Conceptual Plan

Drescher Hall was constructed in 1969 and was identified as recommended for replacement in a Level 2 Assessment conducted by 3D/I in October 2002[3] and reaffirmed as in need of substantial investment in a Facilities Condition Assessment conducted by DLR group in 2020.[4] The proposed Drescher Hall Replacement Building will house the remaining academic departments currently located in the building (Earth Sciences, STEM, and Engineering will relocate to other locations, including Math and Science) as well as general assignment classrooms and a multipurpose room. The building will reinforce the campus boundary with Pico, protecting the core campus from traffic noise while still providing a welcoming and differentiated façade to the community. Academic programs intended to be housed in the Drescher Hall Replacement Building include Photography, English, English as a Second Language, Modern Languages, Communications and Media Studies, Speech and Debate, Bicycle Repair, Cheerleading, Learning Resource Center, GA classrooms, meeting rooms, and offices.

A new Student Union will be placed at the heart of campus to provide student-centered spaces. This will provide a consolidated Learning Resource Center to centralize tutoring spaces. The proposed Student Union will replace the outdated and underutilized Cayton Center, also called the Student Health and Activities building or the Cafeteria. The new Student Union will be a modern facility featuring updated dining vendors, a right-sized bookstore, health and wellness offices, the SMC Bodega food pantry, a maker space[5], as well as relocated uses from Pearl Street (Auxiliary Services, Campus Events, and the Environmental Center. Finally, the Proposed Project will bring together scattered tutoring resources into a centralized Learning Resource Center.

The new Maintenance and Operations (M&O) building on the site of the current Math Complex will consolidate M&O functions into a single facility with immediate campus access. The new M&O Facility will support the facilities team in their work to maintain the entire campus and allow for the removal of stadium shops, outbuildings, and modular offices that are in critical condition. The adjacent yard will provide parking and recharging for electric maintenance carts.

A new police and campus safety station will be a purpose-built modern facility to allow more effective police operations. The replacement police building will be located on the current site of the police headquarters on Pearl Street. The location enjoys a clear line of sight of the main pedestrian spine of the campus. The purpose-built modern facility will allow for more effective operations compared to the adapted houses the police operate from today. The Proposed Project would also allow for consolidation of the 24-hour police dispatch that is currently located in the Library and Media Center.

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3 https://admin.smc.edu/administration/planning/facilities-assesment-report.php

4 https://admin.smc.edu/administration/planning/documents/master-plans/R-07-Facilities-Conditions-Assessment-20240611.pdf

5 A maker's space is a lab classroom with various tools needed to make physical objects, such as a band saw, a drill press, a 3-D printing machine, etc.

Finally, there will be a replacement or wholesale renovation of the Pearl Street houses that currently house Auxiliary Services, the Environmental Center, and Campus Events. The Pearl Street Instructional buildings will be programmed at a later date. Depending on future building condition and proposed program, this proposed building project could also be a renovation of the existing structures or a single larger replacement structure. Under either scenario, the structure(s) will not exceed two stories in order to gracefully bridge to the adjacent residential neighborhood and could feature up to 9,000 gsf of instructional space.

3. Renovations

The Proposed Project proposes ongoing renewal of existing buildings. The Science renovation will update spaces vacated by occupants moving into the new Math and Science building, refresh building finishes like paint and flooring, replace the building roof, and modernize aging building systems.

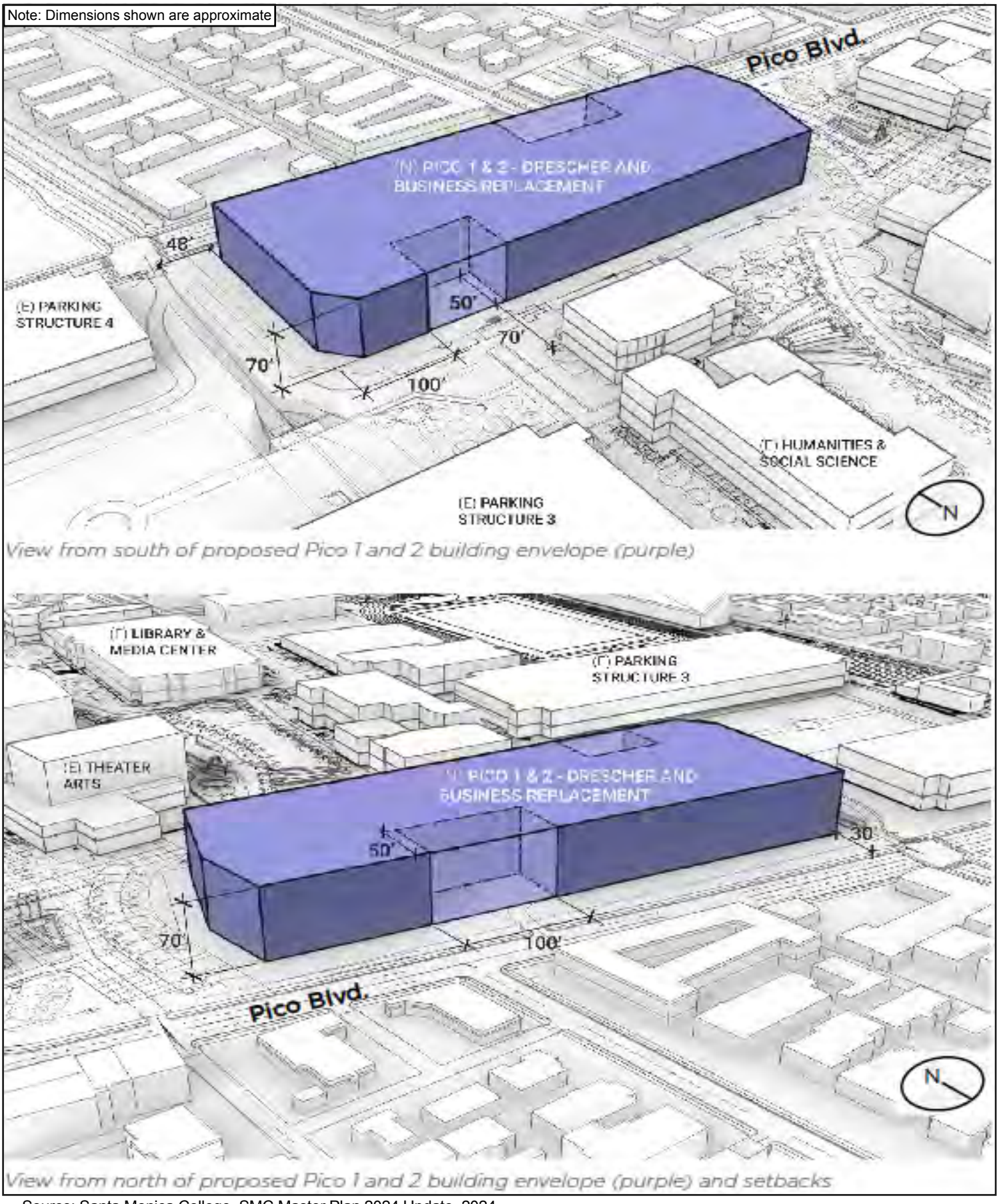
The Library renovation will focus on the main Library building and will upgrade the building HVAC system, replace the roof, and update building finishes to better serve the need for student study space and other activities and programs supported by the Library.

4. Campus Architecture

The Main Campus has a variety of architectural styles constructed at different points in time. The average age of buildings on the SMC Main Campus is 54 years old. The first structure constructed on the Main Campus was the stadium, which remains in use. This stadium opened in the late 1940's and hosts both campus events and local high school track and field events.

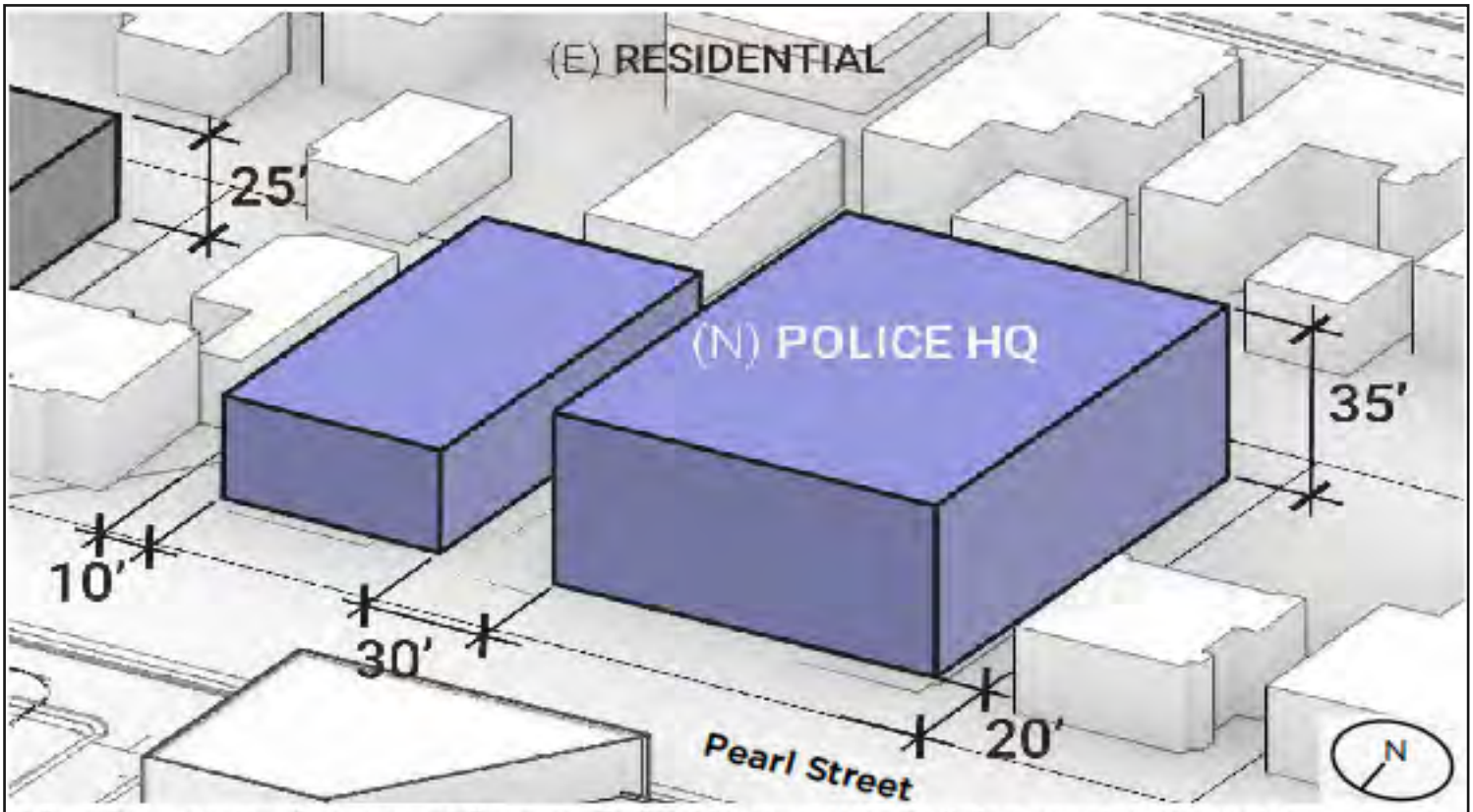
As part of the built environment, to address various needs over the years SMC has felt it necessary or expedient to install multiple temporary and modular buildings to the Main Campus, all of which are proposed for demolition during implementation of the 2024 Campus Master Plan Update. While these modular and temporary structures were originally slated to be in use for a limited amount of time, all modulars have overstayed that duration - some by as many as 20+ years. The demolition and removal of these prefabricated structures will provide greater flexibility, durability, and functionality on the campus. These prefabricated structures include the Math Complex, the Maintenance & Operations Extension (formerly known as the English as a Second Language building), the Pico Classroom Complex, Pico Village, Faculty Village, and the Facilities Offices building.

Illustrative massing diagrams representing conceptual modeling for each of the new Master Plan's buildings are shown in Figures II-8 through II-12 and are described in further detail below. The proposed illustrative massing diagrams are shown and will be used for master plan purposes only. The eventual architectural design and placement of buildings will be established during future design processes.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-8
Illustrative Massing Exhibit - Pico 1 and 2 Buildings



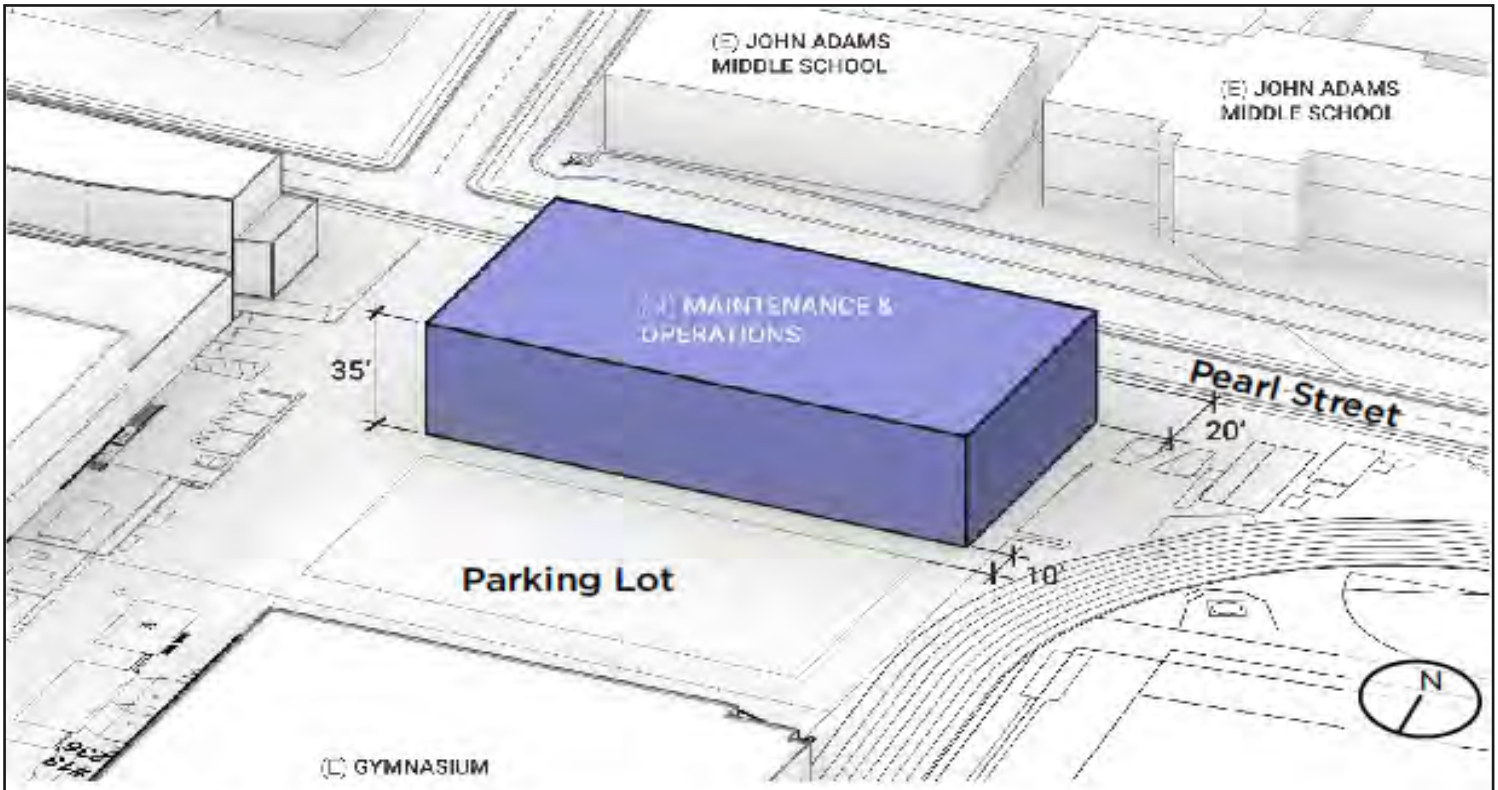
View from north of proposed Campus Police Headquarters building envelope (purple)



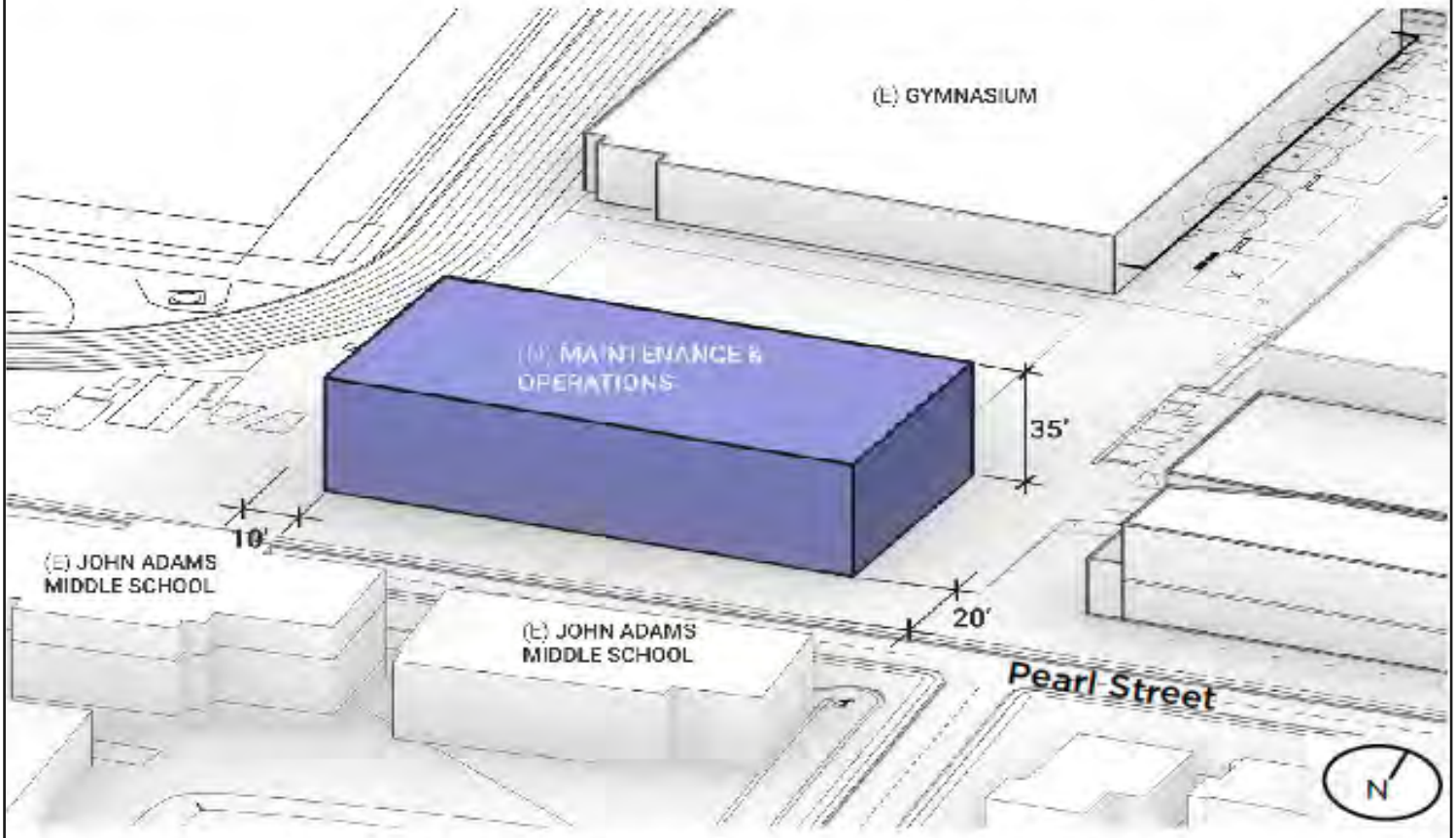
View from south of proposed Campus Police Headquarters building envelope (purple)

Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-9
Illustrative Massing Exhibit - Police Headquarters



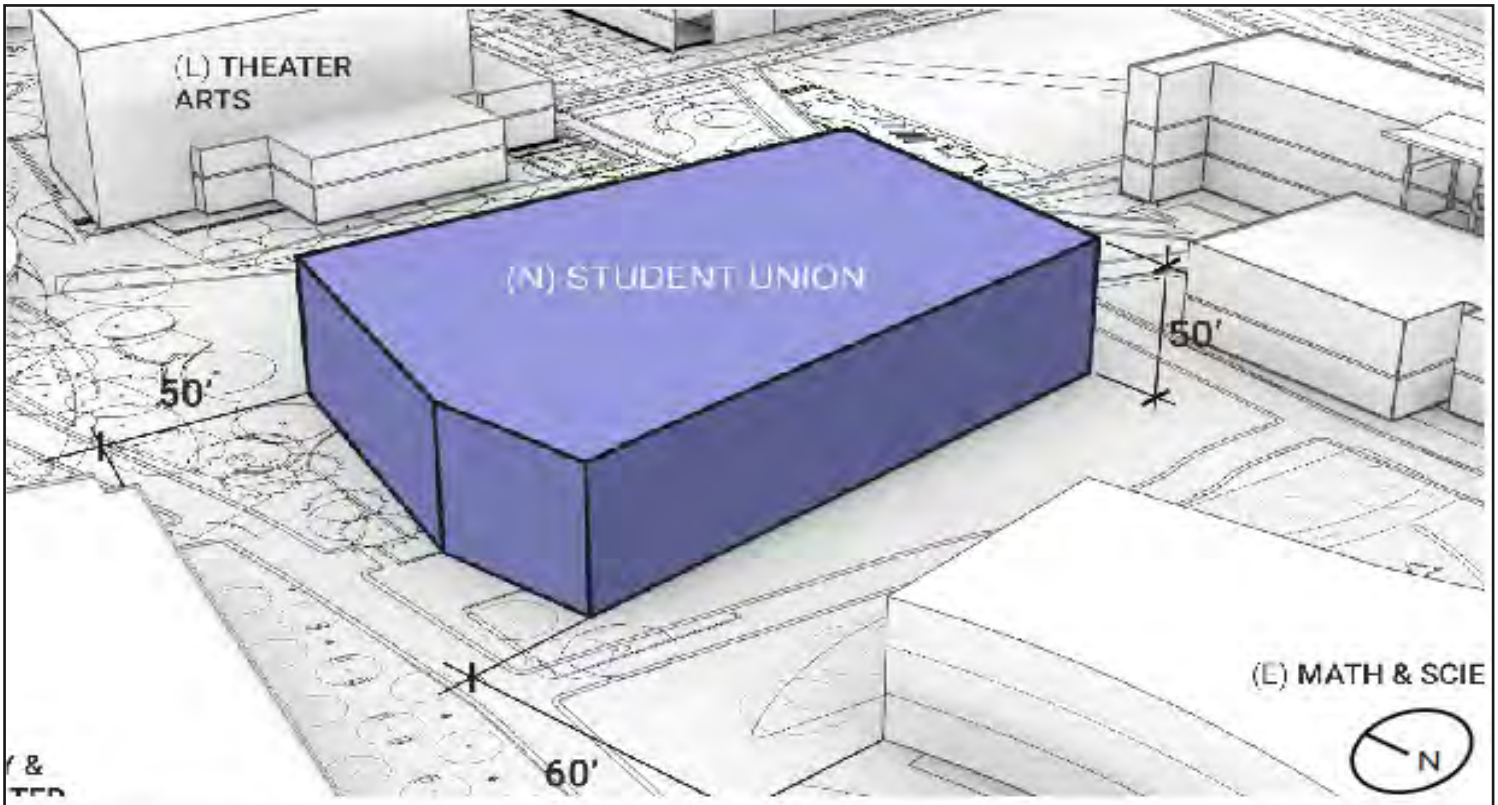
View from north of proposed Maintenance and Operations building envelope (purple)



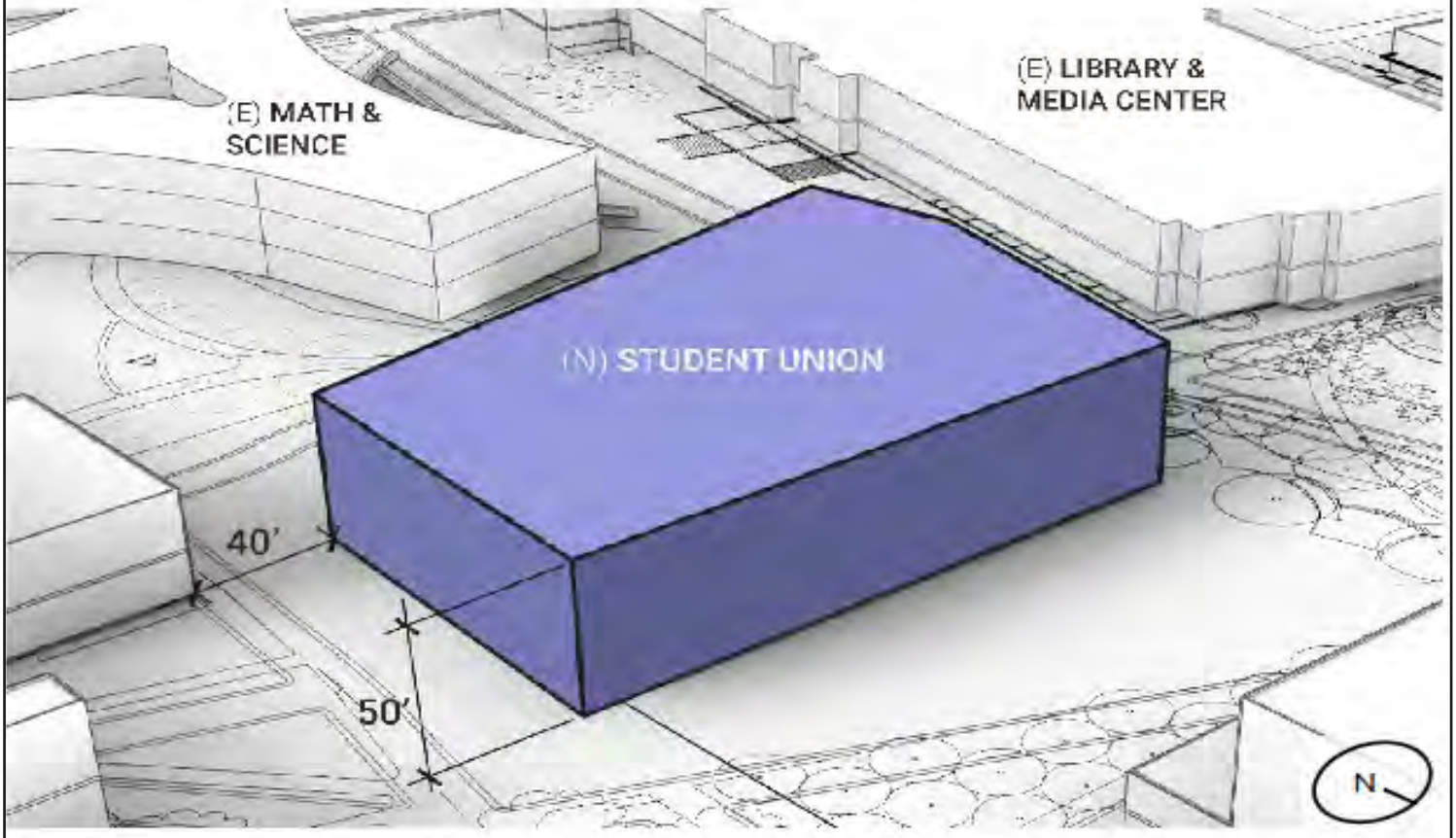
View from south of proposed Maintenance and Operations building envelope (purple)

Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-10
Illustrative Massing Exhibit - Maintenance and Operations



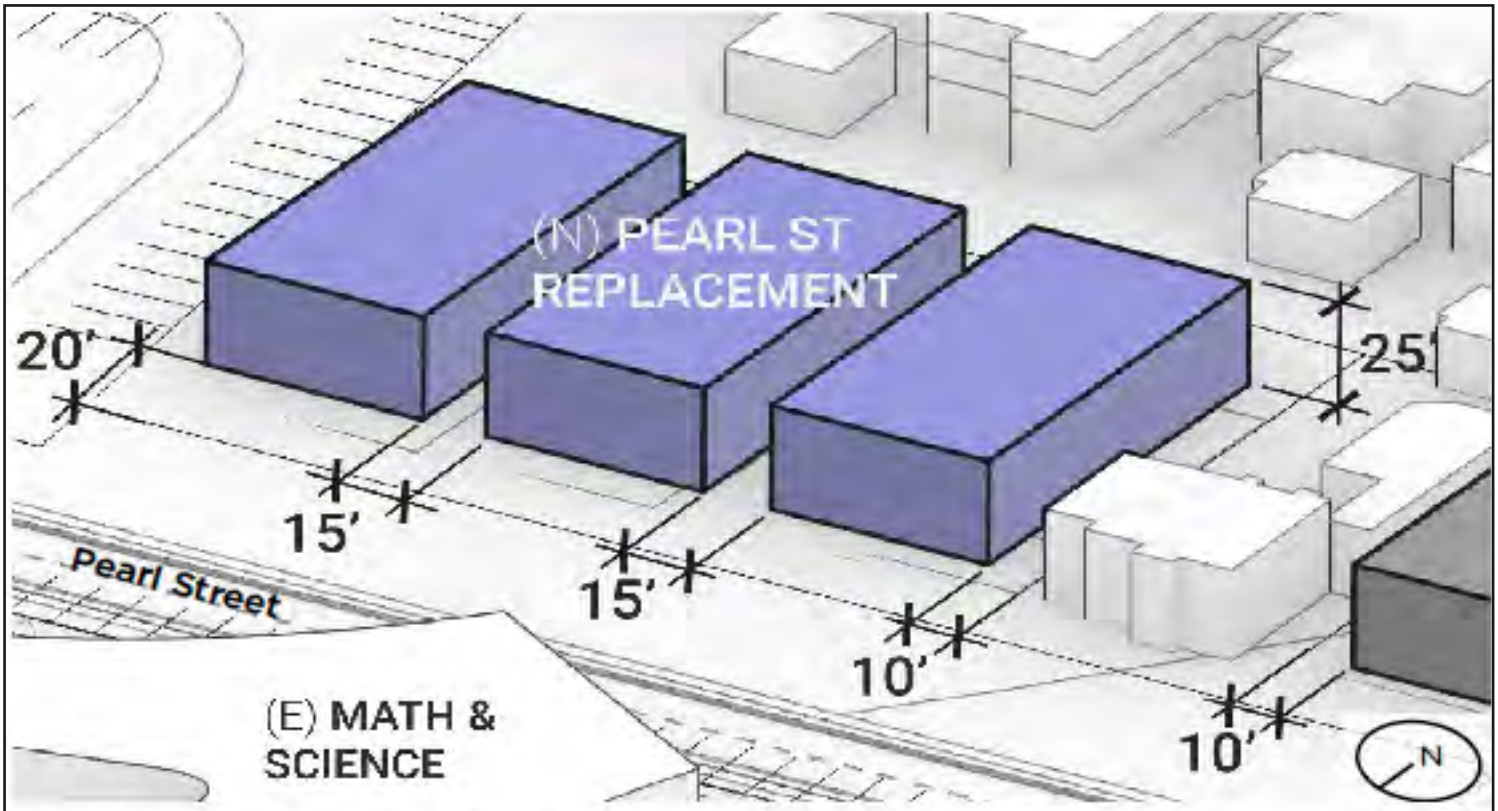
View from south of proposed Student Union building envelope (purple)



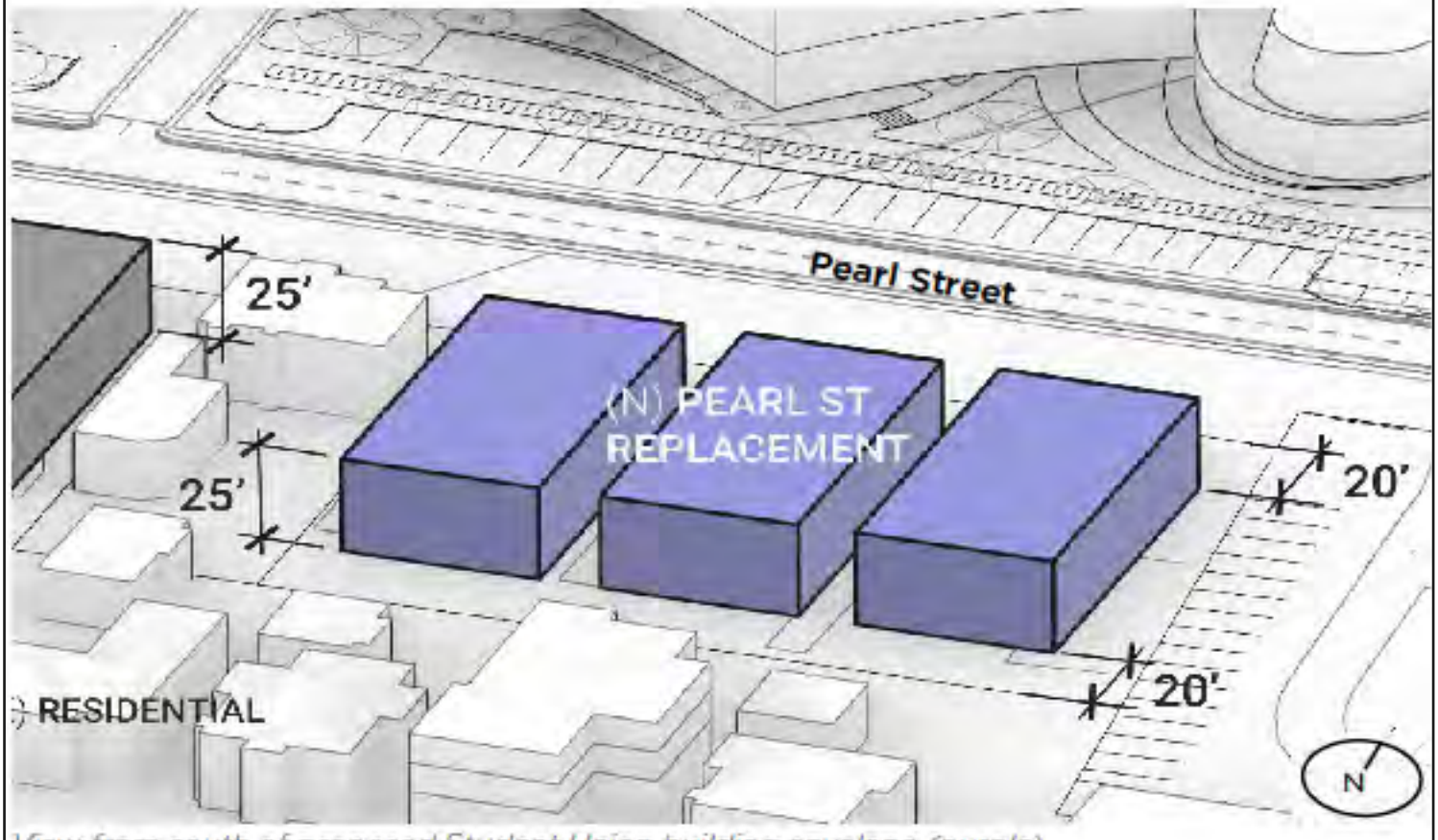
View from north of proposed Student Union building envelope (purple)

Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-11
Illustrative Massing Exhibit - Student Union



View from north of proposed Pearl Street building envelopes (purple)



View from south of proposed Student Union building envelope (purple)

Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-12
Illustrative Massing Exhibit - Pearl Street Replacement Buildings

a) Pico 1 and 2 Replacement Buildings

Pico 1 and 2 can be implemented as a single project or as two (or even three) separate building projects as funding allows. They are currently shown together as a single diagrammatic envelope to allow for design flexibility in splitting the program between the two (or three) buildings if needed. However, it is expected to be important that the Pico Replacement buildings are separated sufficiently from each other to account for pedestrian passage from the Bus Arrival Plaza to the Main Campus.

Pico 1 and 2 will be set back 30 feet from the curb to prevent these buildings from encroaching on the public realm. Currently, Drescher Hall appears to loom over pedestrians. To avoid this, the replacement buildings will be set back and incorporate meaningful separation between building volumes. Exact locations and dimensions of intended open space(s) will remain flexible for resolution during future architectural design of the replacement buildings.

Pico 1 and 2 will have a maximum height of 70 feet and allow up to 4 stories. This scale is needed as Pico 1 and 2 will house many academic and student centered functions. To prevent the feeling of an imposing building, the design is encouraged to terrace the upper floors and thereby allow for visual transition.

b) Campus Police Headquarters

The replacement police building will be located on the current site of the Police Headquarters on Pearl Street. To enable demolition and construction to occur without disruption of critical services, the one-story eastern building will be constructed first, followed by the two-story western building. By sequencing this construction, most of the current operations by campus police services will be able to remain on site during construction.

The Campus Police Headquarters is set back 20 feet from the curb to match the existing context. A 30 foot gap between the two police buildings allows for a driveway to accommodate parking at the rear of the eastern police buildings

The main police building on the west of the lot will have a maximum height of 35 feet, while the smaller building to the east transitions to a maximum height of 25 feet. This change in scale allows for a seamless transition to the neighboring buildings while also providing visual interest while traveling down Pearl Street.

c) Maintenance and Operations

The new M&O building is proposed to be located on the site of the current Math Complex north of Pearl Street with access to the campus between the Library and the Gymnasium. The main entrance of the M&O building will be located on the east side of the building with secondary entrances to the north.

The M&O building will be set back 20 feet from Pearl Street to allow a landscaping buffer and to match the existing context.

The M&O building will be a maximum height of 30 feet to match the existing context and allow the M&O building to blend seamlessly into the existing campus.

d) Student Union

The Student Union and Welcome Lawn will be situated in the center of campus directly adjacent to the Main Quad. This central space allows students to access various amenities and resources in a convenient space on campus. The Student Union will have an entrance in the breezeway on the first floor allowing students to access the entrance from both the north and south of the building.

The Student Union would provide generous setbacks (none less than 40 feet from a neighboring building) to achieve ample space for movement around the building. The large setbacks will accommodate occasional use of large trucks for campus events and allow for emergency vehicles to easily traverse the campus when necessary.

The new Student Union will be a maximum height of 50 feet to respect the existing fabric of the campus and to blend proportionally with its surrounding context.

e) Pearl Street Replacements

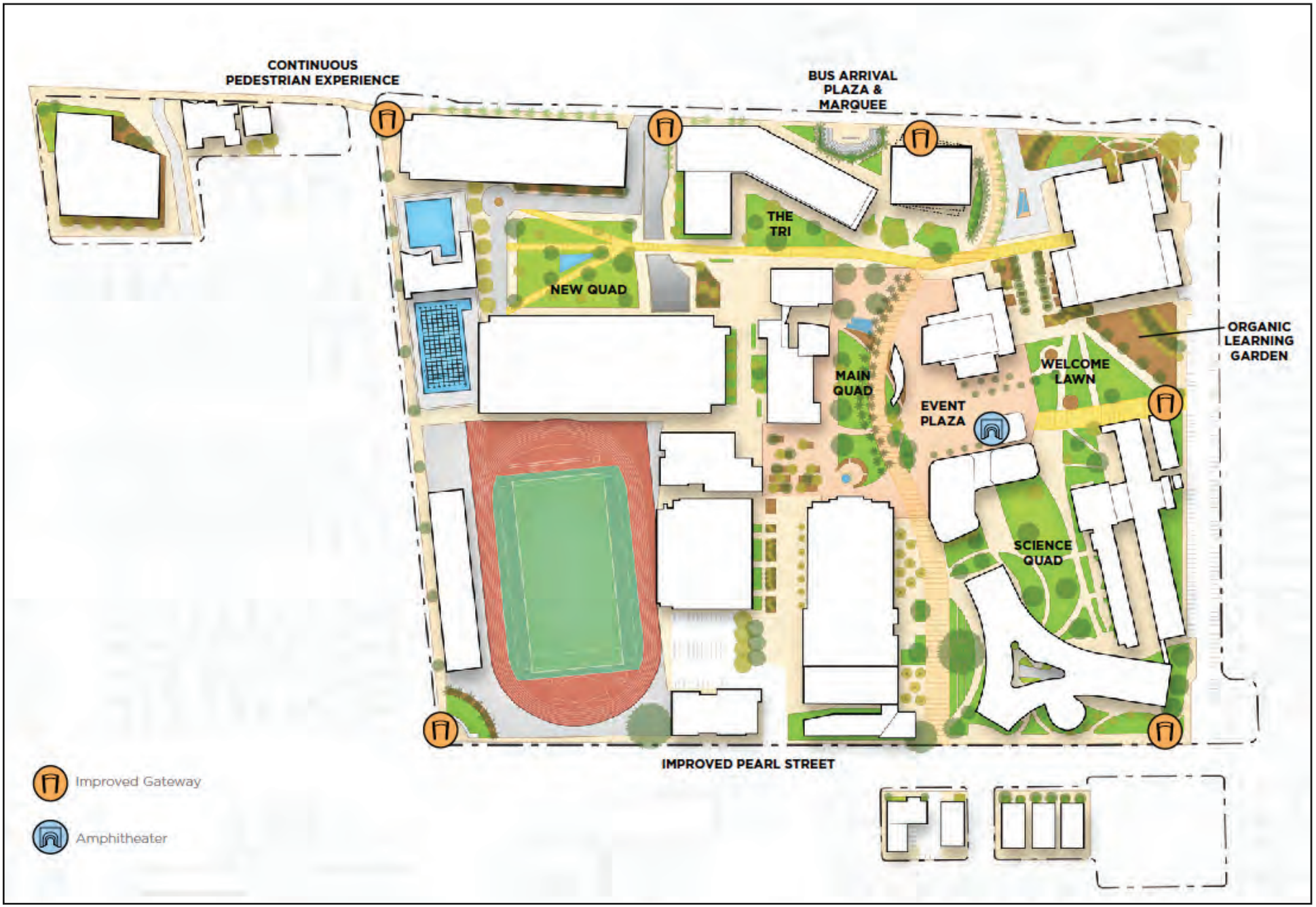
The Pearl Street replacement building(s) will be located south of Pearl Street and across from the Math and Science Building. Entrances to the replacement buildings will front on Pearl Street.

The buildings will be set back 20 feet from the street edge to match the existing context currently on Pearl Street.

The buildings will have a maximum height of 25 feet to respect the height of the neighboring residential homes and blend into the existing fabric surrounding the SMC campus.

5. Open Space and Recreational Amenities

The Proposed Project would include the development of six collaborative and complementary open space areas within the Main Campus: (1) Student Union Landscaping, (2) Art Complex Building Site – Welcome Lawn, (3) Amphitheater, (4) Science Quad, (5) The Tri, and (6) New Quad, which total approximately 90,000 square feet of new or repurposed and re-envisioned open space areas. Additional existing open spaces areas on the Project Site include the Corsair Field and the community swimming pools, which will remain with implementation of the Proposed Project. Figure II-13, Open Space Conceptual Plan, conceptually depicts the publicly accessible open space areas proposed within the Project area.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-13
Open Space Conceptual Plan

a) Student Union Landscaping

The proposed Student Union Landscaping will serve a pedestrian connection between the Science Quad and the Main Quad open spaces. The side facing the Science Quad will likely support the transition to a quieter, more academic secondary open space. The side facing the Main Quad and core of campus is the likely location of outdoor dining areas and a future socializing hub of the campus. The design of the Student Union Landscape will also create suitable connections with the adjacent amphitheater. An event plaza will bridge the Main Quad and the future Amphitheater, adding energy and capacity to the already-vibrant heart of campus.

b) Art Complex Building Site – Welcome Lawn

When the Art Complex building is eventually demolished it will free up a site for a small future building or for landscape development. The Master Plan recommends the site be cultivated as secondary campus quad. The outdoor space will serve the adjacent Student Services Center and it is also a campus gateway for anyone parking in Lot 1 to access the core of campus. Landscaping for the site should be well branded and welcoming and may also include an expansion of the Organic Learning Garden.

c) Amphitheater

The proposed amphitheater will be a multi-use outdoor venue intended to serve both the Santa Monica College student and teaching functions as well as greater Los Angeles performance communities. The covered amphitheater will serve as an informal flexible shaded space for student socializing when events are not taking place. Exact siting and design of the Proposed Project will be determined during the design phase, but the amphitheater will enjoy adjacencies to the proposed Student Union and the Main Quad as a new campus focal point. The Proposed Project has potential to be implemented as part of the Student Union project or as a standalone project. A structural covering will help protect from sun and rain as well as define the space.

d) Science Quad

The Science Quad, located between the Math and Science building and the existing Science complex, is home to SMC's iconic Clock Tower. This open space will likely have a quieter, more academic feel that gradually transitions to the social hub of the Student Union. The open space will feature drought tolerant landscape plantings and seating.

e) The Tri

The triangular open space formed as part of the project site for Drescher Replacement will serve as an approach to the building and will be the first open space that users encounter when arriving from Parking Structure 3 or 4 into Main Campus. When combined with the transitional landscapes to the south it will form a triangular open space that has a similar quiet quality to the Science Quad. A place slightly sheltered from the bustle of the Main Quad, this is a location where studying or napping under a tree might be possible.

f) New Quad

Once the existing Business building is eventually demolished it will free up a site for landscape development. The 2024 Main Campus Master Plan Update recommends the site be cultivated as a secondary campus quad with support for student recreation. New Quad will serve as a gateway for those parking in Structures 3 and 4 as well as those using the swimming pool. A water feature will continue SMC's unique branding and provide a cooling atmosphere.

6. Access and Circulation

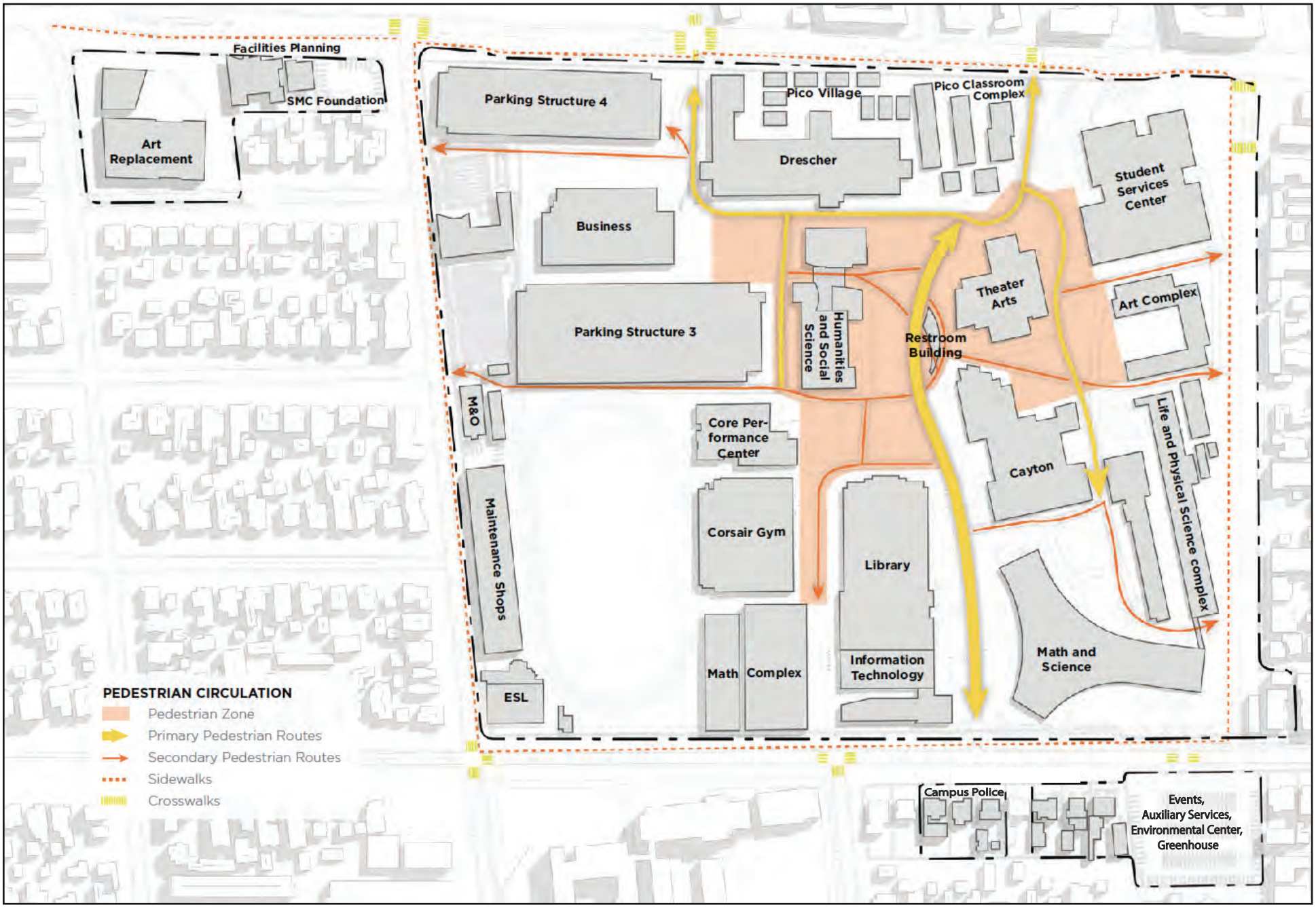
a) Pedestrian Circulation

An illustration of the proposed pedestrian circulation plan is shown in Figure II-14, Proposed Pedestrian Circulation Plan. As shown in Figure II-14, the main pedestrian promenade at SMC begins at the primary drop-off circle along Pico Boulevard and terminates adjacent to the Library and Media center on Pearl Street. While pedestrian movement is mostly oriented north-south through the Main Campus, there are opportunities to better define secondary east-west routes. The 16th Street connection to campus should be improved to provide a clear and distinct access route to campus for both maintenance and operations staff, as well as other SMC staff, students, and visitors. Additionally, a secondary north-south pedestrian route paralleling the existing primary route should move users from Drescher Hall on the north to Pearl Street on the south. Figure II-14, Proposed Pedestrian Circulation Plan.

b) Vehicle Access and Parking

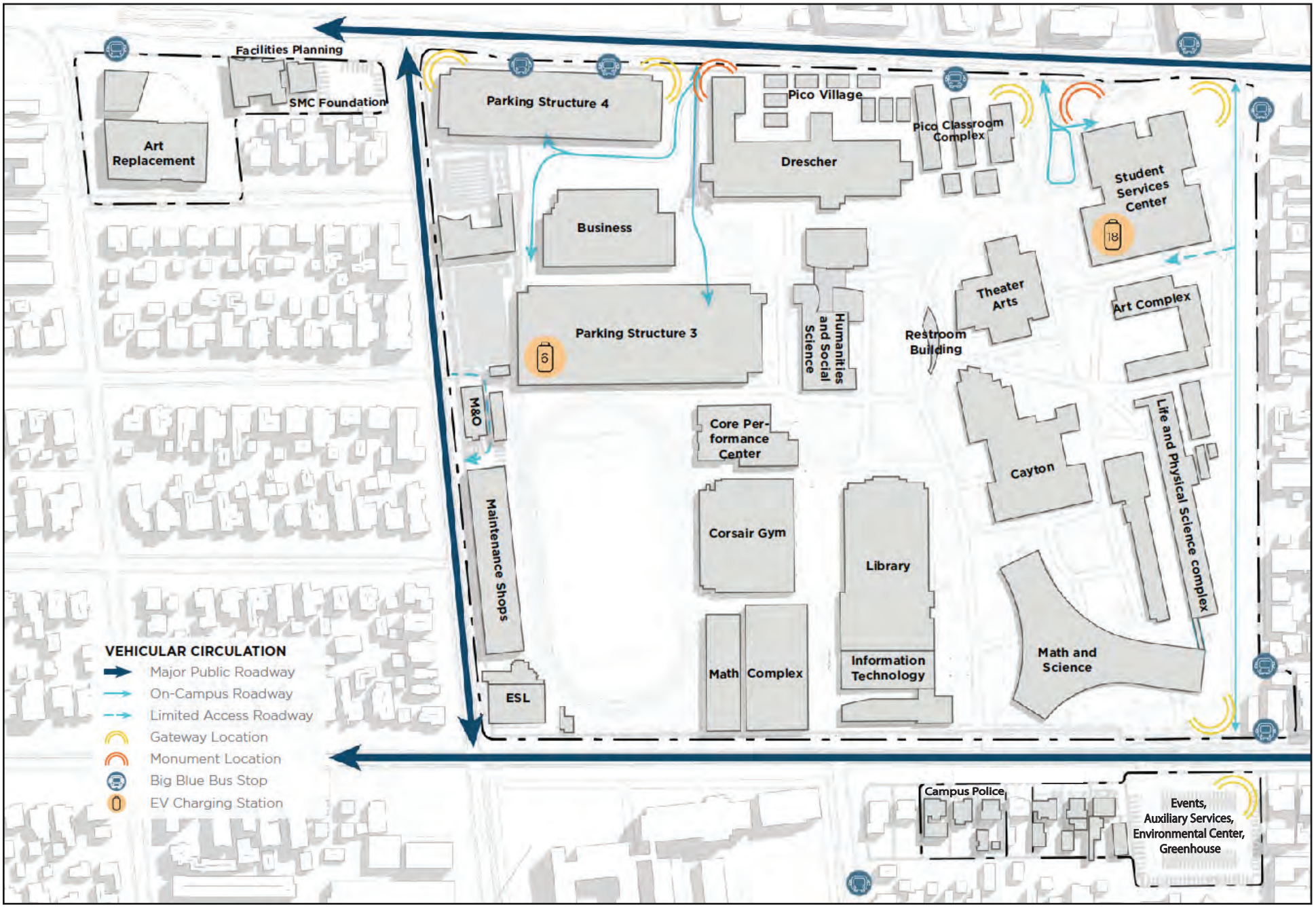
An illustration of the proposed vehicular access and parking plan is shown in Figure II-15, Proposed Vehicle Circulation Plan. As shown in Figure II-15, the main vehicular entrance point into the campus is along Pico Boulevard, which leads to a drop-off area and access into the underground parking garage. This primary drop-off is also host to the BBB bus stop. Currently, the BBB routes 7, 7R, 8, 16, 41, and Metro's Expo Train serve the campus. A secondary drop-off area is located along 18th Street and less frequently used.

There are currently 2,860 vehicle parking spaces located in surface parking lots and parking structures within the Main Campus. With the implementation of the Proposed Project, the total parking provided on campus would be 2,858 vehicle spaces, resulting in a net reduction of two parking spaces. Parking is deemed to be sufficient to accommodate both current usage and future demand. Minimal parking realignments are planned by relocating existing parking to be adjacent to the new M&O building once constructed.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-14
Proposed Pedestrian Circulation Plan



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-15
Proposed Vehicle Circulation Plan

c) Bicycle Access and Parking

An illustration of the proposed bicycle access and circulation plan is provided in Figure II-16, Proposed Bicycle Circulation Plan. Currently there are 302 bicycle parking spaces on campus. As shown in Figure II-16, bicycle parking is located along the perimeter of the campus and adjacent to bike lanes along 16th Street and Pearl Street. There are a total of three Metro bike sharing locations on campus, one on Pico Boulevard with 12 bikes available, one on Pearl Street with six bikes available, and one adjacent to the Math and Science building. A bicycle repair station will be constructed within the new Pico 2 building.

The Project Site does not provide bicycle routes on internal roadways or on-campus pathways. There are bike lanes along 16th Street and Pearl Street adjacent to the Project Site. The City of Santa Monica added a protected bike lane on 17th Street from Wilshire Boulevard to the Project Site. The Proposed Project does not include changes to the current bicycle access and circulation patterns.

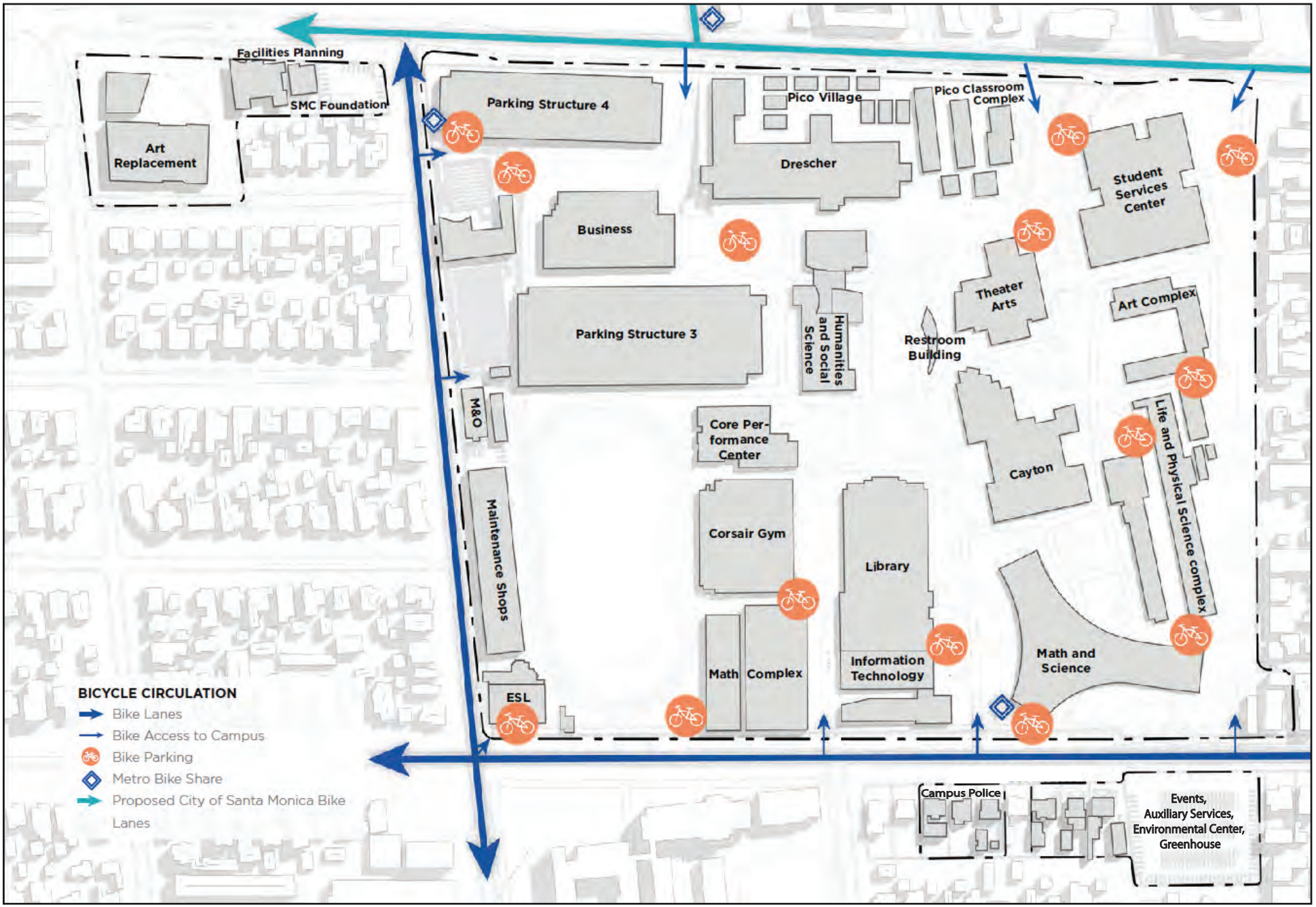
7. Sustainability

In 2018, SMC President Jeffery signed on to the American College and University President's Climate Commitment, reaffirming a previous administration's commitment to carbon neutrality by 2040. As such, the SMC 2024 Main Campus Master Plan Update would include sustainable building designs and would be consistent with local and statewide goals and policies aimed at reducing the generation of greenhouse gas emissions, including SB 32, SB 375, SCAG's RTP/SCS, and CARB's Scoping Plan.

All recently constructed buildings on campus are LEED certified: the Student Services and CORE Performance Center are LEED Platinum, the Center for Media and Design and the Performing Arts Center are LEED Gold and the IT/Media Building and the HSS building are LEED Silver. Considerations for LEED include building energy performance, daylighting, indoor environmental air quality, stormwater, and renewable energy.

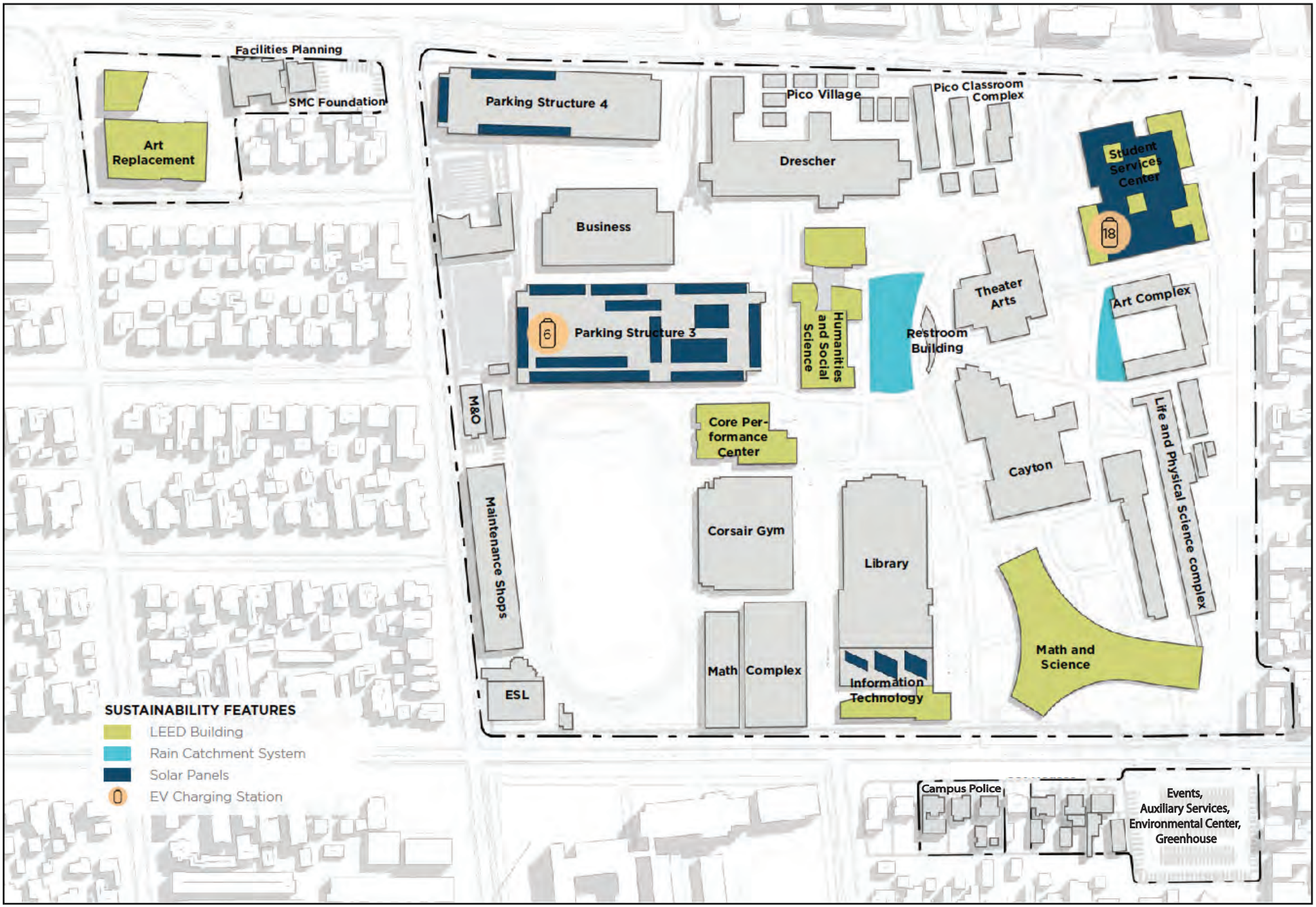
As existing campus buildings are renovated and maintained, they are upgraded to energy efficient fixtures whenever possible. This includes replacing lighting in interior and exterior fixtures, and adding occupancy sensors to reduce energy use when buildings are not occupied. Condensing boilers and other more sustainable building systems are added as existing systems reach the end of their useful life. Projects are also underway to add energy management systems to optimize building operations across campus.

SMC's central plant uses chillers to freeze liquid in off-peak hours and then use the chilled water as refrigerant during the day to provide cooling to all buildings on Main Campus. These systems provide energy efficiency by centrally cooling, using off-peak electricity, and by replacing harmful CFS (a powerful greenhouse gas) with chilled water as a refrigerant. An illustrative exhibit of the sustainability features on the Main Campus is shown in Figure II-17, SMC Main Campus Sustainability Features.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-16
Proposed Bicycle Circulation Plan



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-17
SMC Main Campus Sustainability Features

SMC encourages the use of alternative fueled vehicles. There are currently 18 Electric Vehicle Charging Stations (EVCS) within SMC's Main Campus to support electric and electric-hybrid fuel vehicles. Six level II charging stations are located in the Student Services Center parking garage on the first floor and there are six additional EVCS on each of the two floors below grade. Additionally, there are 29 Electric Vehicle (EV)-reserved parking spaces within SMC's Main Campus. There are 21 parking spaces designated for EVs and zero emission vehicles (ZEVs) for staging before and after charging in the Student Services Center parking garage and another 8 EV-reserved spaces located on the bottom level of the Lot 3 parking garage.

8. Project Construction and Scheduling

It is anticipated that full build-out of the Proposed Project would occur over a 10-year period with an anticipated start of construction in 2025 and final build-out occurring in year 2035. Phasing for full build-out of the Proposed Project is subject to change depending on the scope and timing of each component/phase proposed within the limits of the Project Site. However, full buildout of the entire Proposed Project would be accomplished over the 10-year build-out horizon.

Construction activities associated with each individual development phase would generally involve five main steps: (1) demolition, (2) excavation including grading and shoring, (3) building construction, (4) architectural coating/finishing, and (5) paving and landscaping. A detailed description of the proposed endpoints for each phase of construction is discussed below.

a) Phase 1 Endpoint

As shown in Table II-5, Phase 1 Endpoint would include the demolition of eight buildings on the Project Site (totaling 189,981 gsf of floor area) and the construction three new buildings totaling approximately 188,216 gsf. New uses constructed during this phase include the Pico 1 building, Pico 2 building, and Police Headquarters, totaling 188,216 gsf. Interior renovations to the Life & Physical Sciences Complex would also occur during Phase 1. Interim uses of the Art Complex and Business building will support occupants during the demolition and construction of Phase 1. An illustrative rendering of the Phase I Endpoint is shown in Figure II-18.

Table II-5
Phase 1 Endpoint

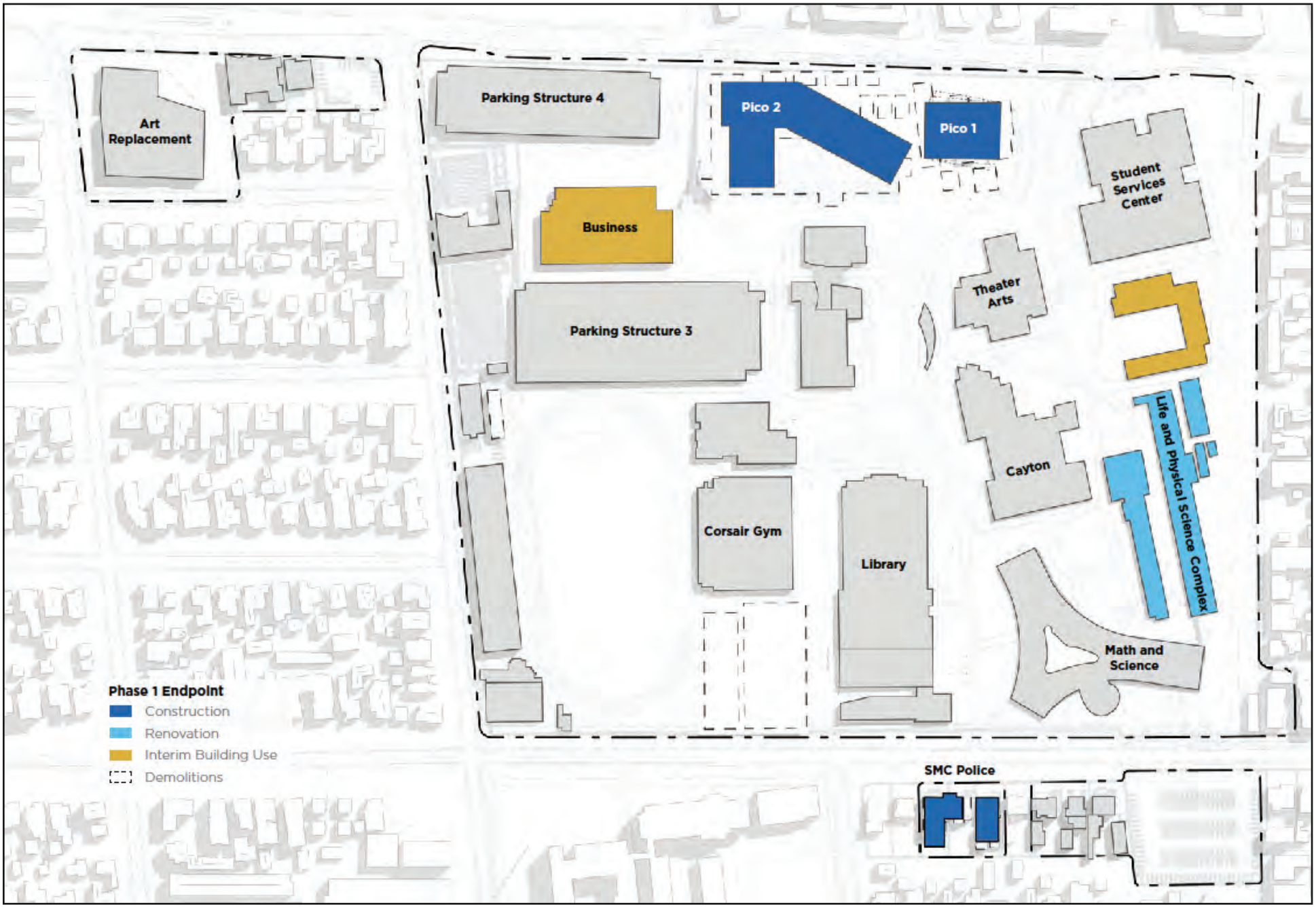
Bldg #	ACTIVITIES	AREA	
		ASF	GSF
	Demolition		
1	Pico Classroom Complex	12,175	18,014
17	Math Complex	27,308	44,872
22	Drescher Hall	64,761	111,145
23	Pico Village	8,190	8,640
27	Campus Police A	1,111	1,400
27	Campus Police B	1,310	1,990
28	Campus Police Annex	1,877	2,000
44	Faculty Village	1,177	1,920
	Subtotal	**117,909**	**189,981**
	New Construction		
A	Pico 1 Business Replacement	49,708	76,474
B	Pico 2 Drescher Replacement	64,832	99,742
C	Police Headquarters	8,400	12,000
	Subtotal	**122,940**	**188,216**
	Renovation		
Z	Life & Physical Sciences Complex	56,801	98,400
	Subtotal	**56,801**	**98,400**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.

a) Phase 2 Endpoint

As shown in Table II-6, the endpoint of Phase 2 would include the demolition of three buildings on the Project Site (totaling 89,330 gsf of floor area) and the construction of the M&O Building and the Student Union (68,000 gsf). Interior renovations to the Library & Media Center would also take place during Phase 2 to address aging finishes and building systems. The construction of a new Student Union and Amphitheater will reinvigorate the heart of campus and open up east west pedestrian flow into the Main Quad. A new M&O building will consolidate functions that are currently spread across buildings, impacting efficiency.

Interim uses of the Art Complex and Business building will continue to support occupants during the demolition and construction of Phase 2. The Business building is already suitable for office and administrative uses. The Art Complex would be adapted to accommodate other Cayton users. An illustrative rendering of the Phase 2 Endpoint is shown in Figure II-19.



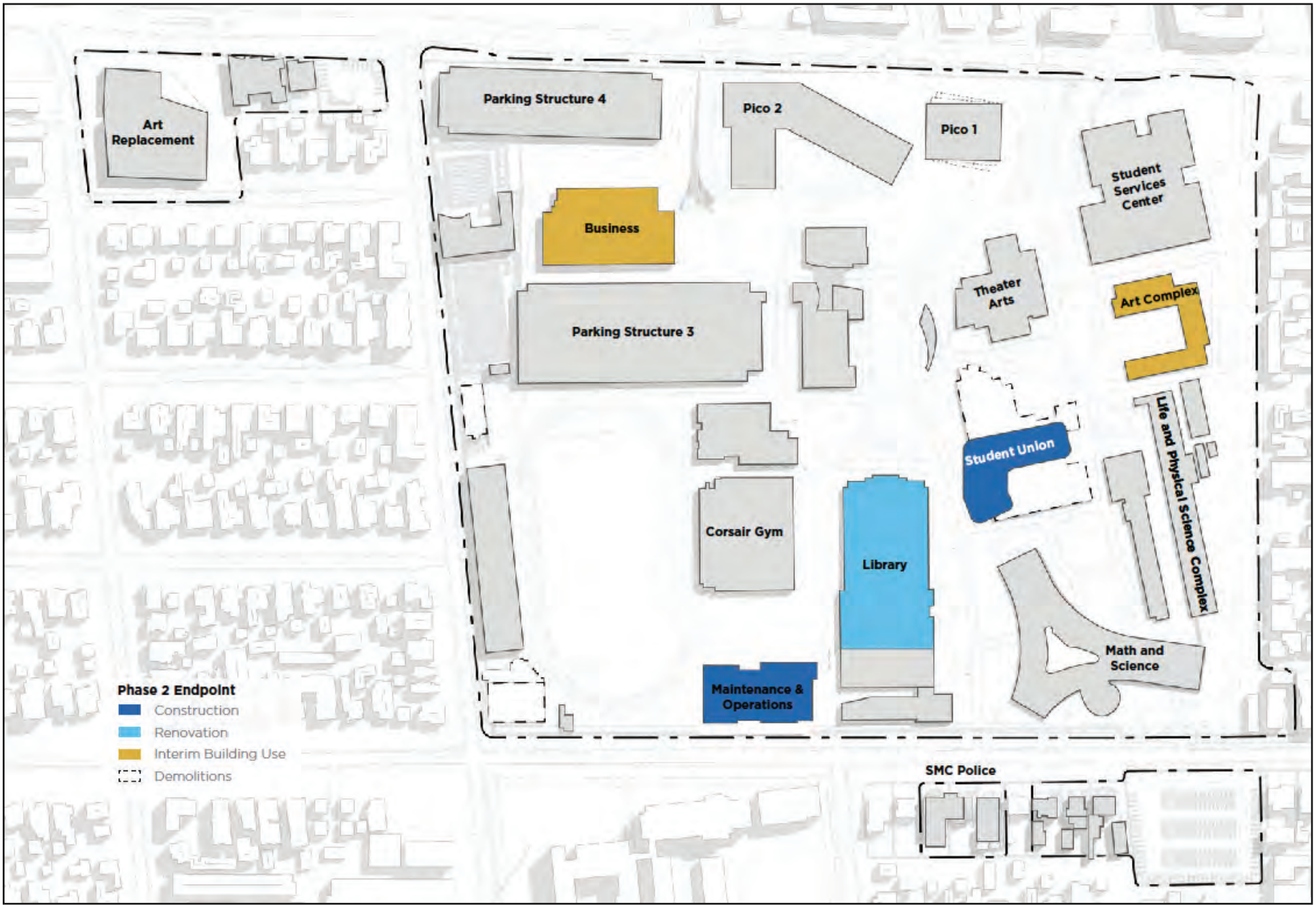
Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-18
Phase 1 Endpoint

Table II-6
Phase 2 Endpoint

Bldg #	ACTIVITIES	AREA	
		ASF	GSF
	Demolition		
5	Maintenance and Operation (M&O) Extension [a]	4,811	6,450
18	Stadium Shops / Facilities Offices	17,043	23,236
19	Student Health & Activities	42,882	59,644
	Subtotal	**64,736**	**89,330**
	New Construction		
D	Student Union	27,300	42,000
E	Maintenance and Operations	16,900	26,000
	Subtotal	**44,200**	**68,000**
	Renovation		
Y	Library & Media Center	78,020	108,673
	Subtotal	**78,020**	**108,673**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-19
Phase 2 Endpoint

b) Phase 3 Endpoint

As shown in Table II-7, Phase 3 would include the demolition of five buildings on the Project Site (Business, Art Complex, Campus Events, Environmental Center, and Auxiliary Services) totaling 80,789 gsf, and the construction of the Pearl Street Replacements (9,000 gsf).

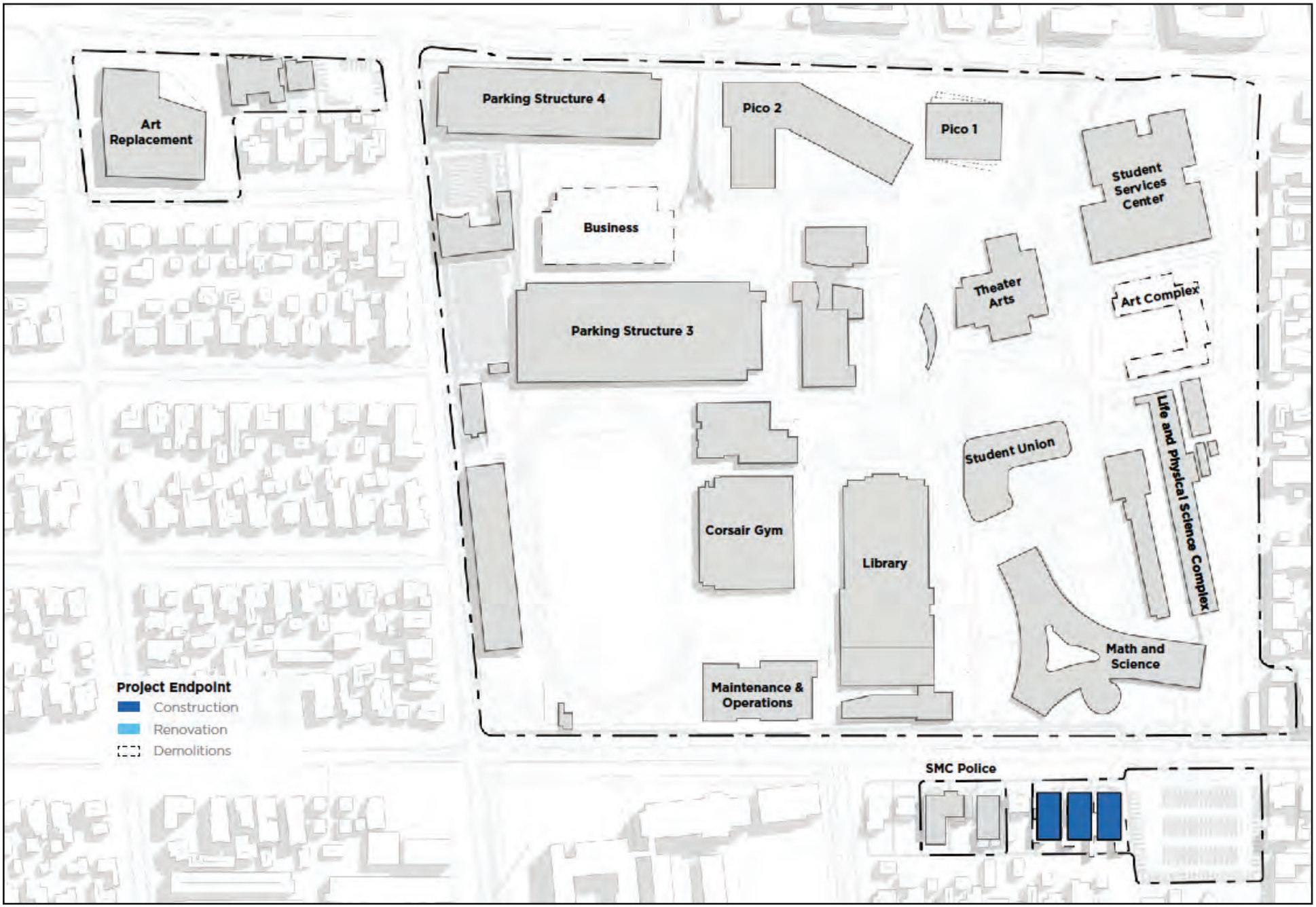
Following demolition of the Art Complex, a new Welcome Lawn and relocated Organic Learning Garden will create an improved campus gateway from Lot 1 to access the core of campus. The outdoor space will serve events in the adjacent Student Services Center. Landscaping for the site should be well branded and welcoming. It will also connect seamlessly to the new Amphitheater and event plaza.

Demolition of the existing Business building will create space for a new Quad with a water feature. This Quad will form a new campus gateway for those parking in Lots 3 and 4 and will also serve visitors to the pool. An illustrative rendering of the Phase 3 Endpoint is shown in Figure II-20.

Table II-7
Phase 3 Endpoint

Bldg #	ACTIVITIES	AREA	
		ASF	GSF
	Demolition		
3	Art Complex	15,065	22,127
6	Business	36,332	53,772
26	Campus Events	1,206	1,600
29	Environmental Center	959	1,400
30	Auxiliary Services	1,685	1,890
	Subtotal	**55,247**	**80,789**
	New Construction		
F	Pearl Street Replacements	5,850	9,000
	Subtotal	**5,850**	**9,000**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024.

Figure II-20
Phase 3 Endpoint

c) Haul Route

During build-out of the Proposed Project, construction and demolition debris would be recycled to the maximum extent feasible. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation, and all construction and demolition debris would be delivered to a certified construction and demolition waste processing facility. The Proposed Project would also comply with AB 939, AB 341, AB 1826, and DSA waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

It is estimated that full build-out of the Proposed Project over the projected 10 year period, would require the excavation and export of approximately 10,000 cubic yards ("cy") of soil. Haul truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. Hauling activities would be limited to off-peak commuter hours between 9:00 a.m. and 3 p.m. Monday through Saturday. Export material would be transported to a designated fill site or privately owned landfill facility within Los Angeles County which accepts inert soil material.

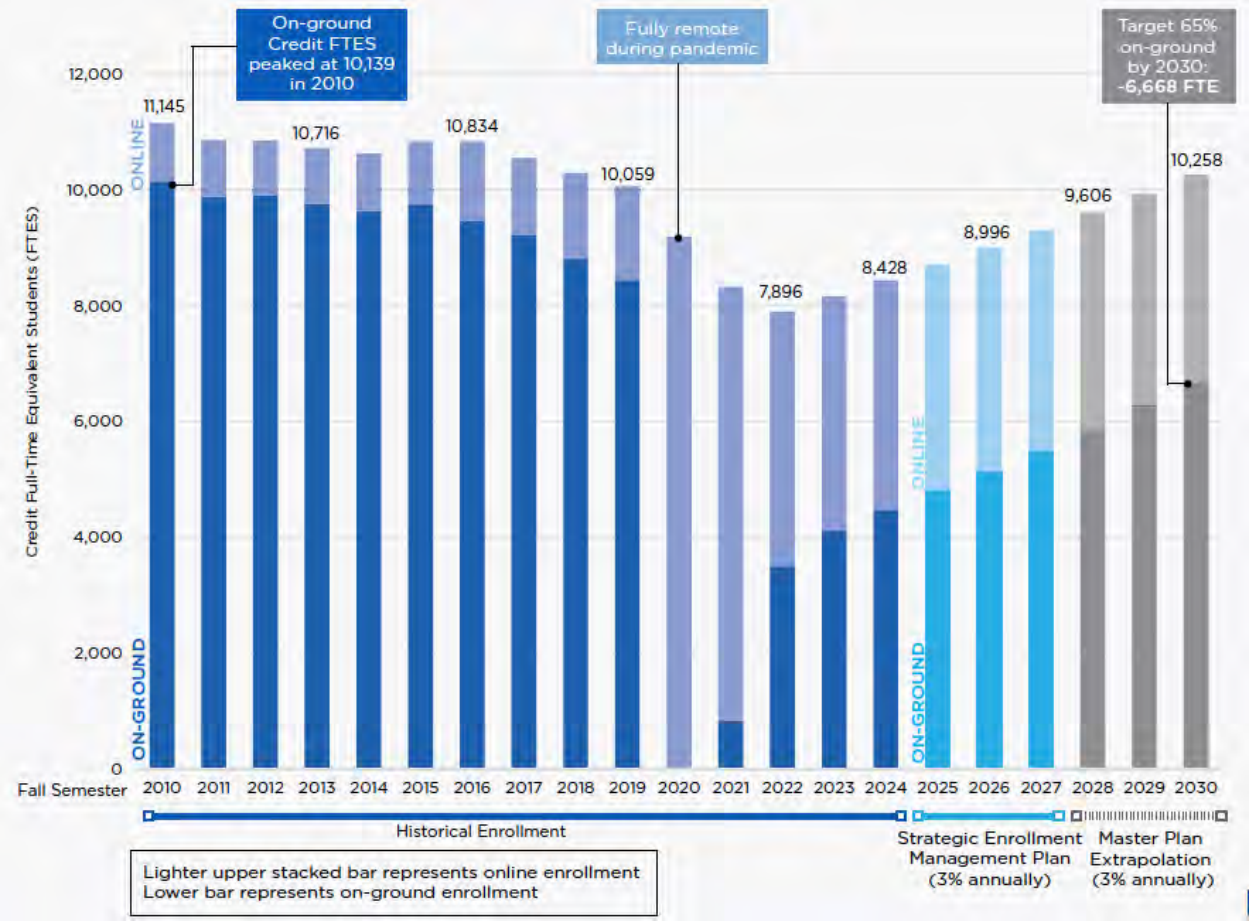
The haul route to and from the landfill facilities would likely involve traveling eastbound on Pico Boulevard, and northbound on Cloverfield Boulevard to access the I-10 Freeway. Returning trips would likely utilize the same route but travel southbound on Cloverfield Boulevard and westbound on Pico Boulevard. The haul routes specified above may be modified in compliance with City policies, as applicable to each development phase.

9. Enrollment Projections

As noted in the SMC 2024 Main Master Plan Update, SMC's Strategic Enrollment Management (SEM) Plan projects enrollment growth of 3% annually through 2027. This growth projection was extrapolated through 2030 for master planning purposes. Space needs are determined by breaking down the target enrollment projection to focus on students that are likely to be on campus (on-ground instruction students and an additional factor to support online students that may come to campus to access services). This adapted measurement results in the Full-Time Equivalent Students (FTES) used as the baseline for future space needs calculations. Student FTE metrics are used to interpolate faculty and staff needs to support the target enrollment.

As shown in Table II-8, enrollment on the Main Campus has fluctuated widely over the past decade. In 2010 the on-ground credit FTES on the Main Campus peaked at 10,139 students. With the increase in online learning courses and the buildout of other satellite campuses the on-ground student enrollment levels gradually decreased to just over 8,000 FTES in 2019. In 2020 as a result of the Covid-19 pandemic, SMC went fully remote and the on-ground FTES fell to zero. Since 2021 the on-ground student enrollment has been steadily increasing and is currently estimated to be approximately 5,500 FTES. While the Main Campus is expected to experience an annual enrollment growth of 3% through 2030, with a target of approximately 6,668 FTES, the on-ground student enrollment is projected to remain below SMC's historical on-ground student enrollment of 10,139 students in 2010 and SMC's pre-pandemic enrollment levels in 2019.

Table II-8
Historical and Projected Enrollment (Full Time Equivalent Students)



E. Discretionary Approvals

1. Lead Agency

Under CEQA, the public agency that has the principal responsibility for carrying out or approving a project is referred to as the "Lead Agency". For purposes of the Proposed Project, Santa Monica Community College District (SMC) is the primary governmental agency responsible for approving the Proposed Project and therefore constitutes the Lead Agency. The SMC Board of Trustees is the decision-making body of the District.

Discretionary approvals anticipated at this time could include, but are not limited to, certification of this EIR, potential adoption of a statement of overriding considerations, final approval of the 2024 Main Campus Master Plan Update by the SMC Board of Trustees, and a potential vote to override municipal zoning. Other governmental approvals, as may be necessary, will be pursued in accordance with all applicable laws and regulations. SMC will be required to submit building plans to the Division the State Architect for structural safety, access compliance, and fire and life safety approvals.

Other discretionary and ministerial permits and approvals that may be deemed necessary, may include temporary street closure permits, and/or utility relocations and new service connections.

2. Other Public Agencies

As part of its environmental review, the Lead Agency consults with other public agencies that retain jurisdiction by law over natural resources affected by the Proposed Project. Such agencies that may review the EIR include, but are not limited to the following:

- Regional Water Quality Control Board, Los Angeles Region
- South Coast Air Quality Management District

III. ENVIRONMNETAL SETTING

A. INTRODUCTION

This section of the Draft EIR provides an overview of the existing regional and local setting in which the Project Site is located, and a brief description of the existing conditions at the Project Site. Detailed environmental setting information is provided in each of the environmental issue analyses found in Section IV, Environmental Impact Analysis, of this Draft EIR. In addition, Section II, Project Description, of this Draft EIR, provides additional information regarding existing conditions at the Project Site.

B. PROJECT LOCATION AND ENVIRONMENTAL SETTING

1. Project Location

The Project Site includes SMC's Main Campus, located at 1900 Pico Boulevard in the City of Santa Monica, CA. Santa Monica College's Main Campus encompasses approximately 43 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. Figure II-1, in Section II, Project Description, shows the location of the Project Site in relation to the City of Santa Monica and the greater Los Angeles area. Table II-1, in Section II, Project Description, provides a summary of development within SMC's Main Campus.

2. On-Site Conditions

As shown in Figure II-3, in Section II, Project Description, the Project Site is currently improved with 1,065,931 square feet of existing gross floor area and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. A detailed inventory of the existing buildings and facilities on the Project Site is provided in Table II-2 in Section II, Project Description.

As shown in Figures II-3 and II-4, in Section II, Project Description, vehicular access to the SMC Main Campus is provided from driveways along Pico Boulevard, 16th Street, and Pearl Street. The existing site driveways provide access to and from the parking structures and surface parking lots.

Along Pico Boulevard there is one separate ingress driveway to enter Parking Structure 4, located at the corner of Pico Boulevard and 16th Street, and one separate egress driveway to exit Parking Structure 4. Additionally, there is a one-lane ingress and two-lane egress driveway at the intersection of Pico Boulevard and 17th Street which provides access to Parking Structure 3. There is another ingress/egress driveway providing access to a surface parking lot along Pico

Boulevard. There is an additional one-lane ingress and two-lane egress driveway along Pico Boulevard to provide access to the subterranean parking structure under the Student Services Center. There is one ingress/egress driveway along Pico Boulevard which provides access to the surface parking lot along the eastern border of the SMC Main Campus, along the north side of Pearl Street.

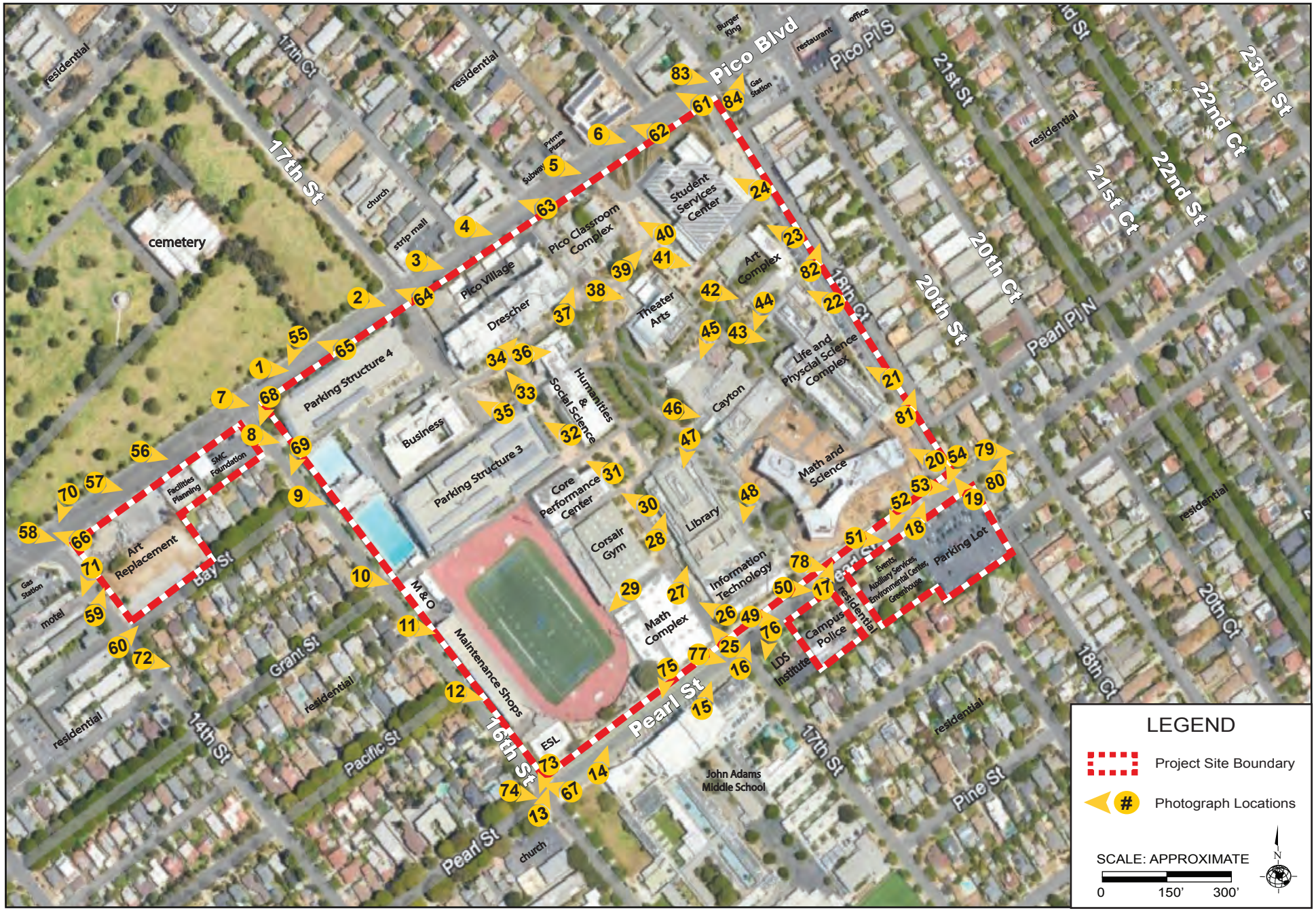
Along 16th Street there are four authorized personnel only ingress/egress driveways and one egress only driveway to exit the parking structure located at the corner of Pico Boulevard and 16th Street.

Along Pearl Street there is one ingress/egress driveway which provides access to the surface parking lot along the eastern border of the SMC Main Campus. There is one ingress/egress driveway which provides access to a surface parking lot adjacent to the Library and Media Center. There are two additional ingress/egress driveways for authorized personnel only.

Vehicular access to the additional properties located along Pico Boulevard is provided from an ingress/egress driveway along 16th Street, three ingress/egress driveways along Pico Boulevard, and one ingress/egress driveway along 16th Street.

Vehicular access to the additional properties located along Pearl Street is provided from six driveways along the south side of Pearl Street. There is one ingress/egress driveway which provides access to a surface parking lot on the south side of Pearl Street.

Photographs depicting the current conditions of the Project Site are provided in Figures III-2 through III-11. Photographs depicting the current conditions of the surrounding land uses are provided in Figures III-12 through III-15. An aerial image with the photograph locations is provided in Figure III-1.



Source: Google Earth, Aerial View, 2022.

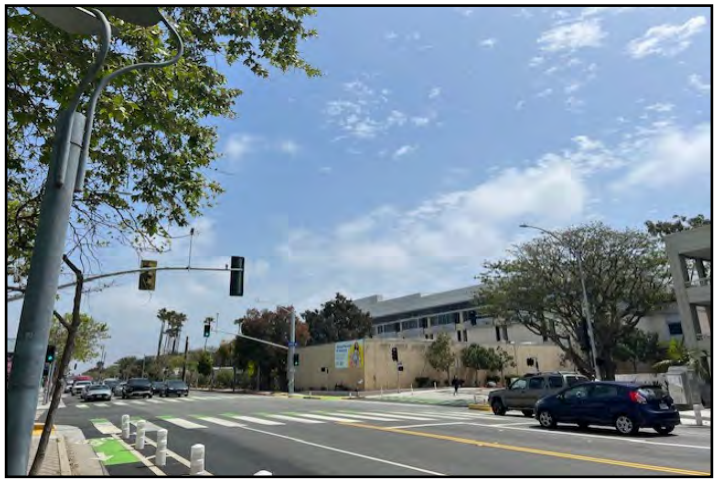
Figure III-1
Aerial Photograph and Photograph Locations Key



View 1: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 2: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 3: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 4: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 5: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 6: From the north side of Pico Boulevard, looking southeast at the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-2
Photographs of the Project Site
Northern Perimeter



View 7: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 8: From the west side of 16th Street, looking southeast at the Project Site.



View 9: From the west side of 16th Street, looking southeast at the Project Site.



View 10: From the west side of 16th Street, looking southeast at the Project Site.



View 11: From the west side of 16th Street, looking southeast at the Project Site.



View 12: From the west side of 16th Street, looking southeast at the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-3
Photographs of the Project Site
Western Perimeter



View 13: From the south side of Pearl Street, looking northeast at the Project Site.



View 14: From the south side of Pearl Street, looking northeast at the Project Site.



View 15: From the south side of Pearl Street, looking northeast at the Project Site.



View 16: From the south side of Pearl Street, looking northeast at the Project Site.



View 17: From the south side of Pearl Street, looking northeast at the Project Site.



View 18: From the south side of Pearl Street, looking northeast at the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-4
Photographs of the Project Site
Southern Perimeter



View 19: From the south side of Pearl Street, looking northwest at the Project Site.



View 20: From the eastern boundary of the Project Site, looking northwest at the Project Site.



View 21: From the eastern boundary of the Project Site, looking northwest at the Project Site.



View 22: From the eastern boundary of the Project Site, looking northwest at the Project Site.



View 23: From the eastern boundary of the Project Site, looking northwest at the Project Site.



View 24: From the eastern boundary of the Project Site, looking northwest at the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-5
Photographs of the Project Site
Eastern Perimeter



View 25: From the south side of Pearl Street, looking northwest at the Math Complex and Information Technology buildings.



View 26: Looking northwest at the Math Complex building.



View 27: Looking northeast at the Information Technology and Library buildings.



View 28: Looking northeast at the Library building.



View 29: Looking west at the Corsair Field.



View 30: Looking northwest at the Corsair Gym and Core Performance Center.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-6
Photographs of the Project Site
Southwest Campus



View 31: Looking northwest at the Core Performance Center and Drescher building.



View 32: Looking northwest at Parking Structure 3.



View 33: Looking north at the Drescher building and Parking Structure 4.



View 34: Looking east at the Drescher building.



View 35: Looking northwest at the Business building, Parking Structure 4, and Drescher building.



View 36: Looking east at the Humanities and Social Science building.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-7
Photographs of the Project Site
Northwest Campus







View 39: Looking east at the Student Services Center.



View 40: Looking northwest at the Pico Clssroom Complex.



View 41: Looking southeast at the Student Services Center and the Art Complex.



View 42: Looking southeast at the Art Complex.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-8
Photographs of the Project Site
Northeast Campus



View 43: Looking southeast at the Life and Physical Science Complex.



View 44: Looking southwest at the Cayton building.



View 45: Looking southwest at the Cayton building.



View 46: Looking southeast at the Cayton and Math and Science buildings.



View 47: Looking southwest at the library building.



View 48: Looking southwest at the library and Information Technology building.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-9
Photographs of the Project Site
Southeast Campus



View 49: From the north side of Pearl Street, looking southeast at the Project Site.



View 50: From the north side of Pearl Street, looking southeast at the Project Site.



View 51: From the north side of Pearl Street, looking southeast at the Project Site.



View 52: From the north side of Pearl Street, looking southwest at the Project Site.



View 53: From the north side of Pearl Street, looking southeast at the Project Site.



View 54: From the north side of Pearl Street, looking southwest at the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-10
Photographs of the Project Site
Pearl Street Properties



View 55: From the north side of Pico Boulevard, looking southwest at the Project Site.



View 56: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 57: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 58: From the north side of Pico Boulevard, looking southeast at the Project Site.



View 59: From the west side of 14th Street, looking northeast at the Project Site.



View 60: From the west side of 14th Street, looking east at the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-11
Photographs of the Project Site
Pico Boulevard Properties

3. Zoning and Land Use Plans

Land use development within the City of Santa Monica is regulated by the Santa Monica Municipal Code (SMMC) and the City of Santa Monica General Plan (General Plan). For purposes of the Proposed Project, Santa Monica Community College District (SMC) is the primary governmental agency responsible for approving the Proposed Project. The SMC Board of Trustees is the decision-making body of the District.

The Main Campus area bounded by Pico Boulevard to the north, 18th Court to the east, Pearl Street to the south, and 16th Street to the west is zoned PL – Institutional / Public Lands and has a Land Use and Circulation Element (LUCE) General Plan land use designation of Institutional / Public Lands. The properties along south side of Pico Boulevard between 14th Street and 16th Street are zoned NC - Neighborhood Commercial and R1 - Single Unit Residential with corresponding General Plan land use designations of Neighborhood Commercial and Single Family Housing. The properties on the south side of Pearl Street are zoned R1 - Single Unit Residential with a corresponding General Plan land use designation of Single Family Housing. A description of the applicable development regulations and policies set forth by the SMMC and applicable planning documents is provided in Section IV.F, Land Use and Planning. Figure II-2, in Section II. Project Description, shows the existing zoning and land use designation on the Project Site and in the surrounding area.

Public colleges are expressly permitted in the Institutional/Public Lands land use designation. In addition, pre-existing SMC uses are located on the NC and R1 lots. Thus, the land use of the Project Site is consistent with the allowable land uses under the existing land use designation.

4. Transit Systems

The Project Site is served by bus lines operated by the City of Santa Monica's Big Blue Bus and the Los Angeles Metro Rail. As depicted in Figure II-15 in Section II, Project Description, there are a number of Big Blue Bus stops located in the immediate Project Site vicinity along Pico Boulevard, Pearl Street, 20th Street, and 14th Street. Multiple bus lines service the Project Site and nearby area, including Big Blue Bus lines 7, R7, 8, 16, 41, and 43. These lines service Santa Monica, in addition to having stops with connections in the city of Los Angeles. Additionally, the Los Angeles Metro 17th Street / SMC Station (Metro E line) serves the Project Site.

5. Surrounding Land Uses

As shown in Figure II-4, Aerial Photograph of the Project Site and Surrounding Land Uses, in Section II, Project Description, the properties surrounding the Project Site include commercial, retail, institutional, and residential land uses. Below is a description of the existing conditions surrounding the Main Campus portion of the Project Site. Zoning and General Plan land use designations for the surrounding land uses are depicted in Figure II-2, in Section II, Project Description.

To the north of the Project Site is Pico Boulevard. There are commercial and residential properties fronting Pico Boulevard. Further north, are residential properties and the Woodlawn Cemetery.

To the west of the Project Site is 16th Street. Further west, past 16th Street, are residential properties. Also west of the Main Campus are the SMC Pico Boulevard properties (Art Complex, Facilities Planning, the SMC Foundation, and associated parking).

To the east of the Project Site is 18th Court. Further east, past 18th Court, are residential and commercial properties.

To the south of the Project Site is Pearl Street. Further south, past Pearl Street, are residential properties and John Adams Middle School. Additionally, the SMC Pearl Street properties and an SMC surface parking lot are located south of the Main Campus.



View 61: From the south side of Pico Boulevard, looking northwest at the properties north of the Project Site.



View 62: From the south side of Pico Boulevard, looking northwest at the properties north of the Project Site.



View 63: From the south side of Pico Boulevard, looking northwest at the properties north of the Project Site.



View 64: From the south side of Pico Boulevard, looking northwest at the properties north of the Project Site.



View 65: From the south side of Pico Boulevard, looking northwest at the properties north of the Project Site.



View 66: From the south side of Pico Boulevard, looking northwest at the properties north of the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-12
Photographs of the Surrounding Land Uses
North



View 67: From the south side of Pearl Street, looking northwest at the properties west of the Project Site.



View 68: From the east side of 16th Street, looking southwest at the properties west of the Project Site.



View 69: From the east side of 16th Street, looking southwest at the properties west of the Project Site.



View 70: From the north side of Pico Boulevard, looking southwest at the properties west of the Project Site.



View 71: From the east side of 14th Street, looking southwest at the properties west of the Project Site.



View 72: From the west side of 14th Street, looking southeast at the properties west of the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-13
Photographs of the Surrounding Land Uses
West



View 73: From the north side of Pearl Street, looking southwest at the properties south and west of the Project Site.



View 74: From the north side of Pearl Street, looking southeast at the properties south of the Project Site.



View 75: From the north side of Pearl Street, looking southwest at the properties south of the Project Site.



View 76: From the north side of Pearl Street, looking southwest at the properties south of the Project Site.



View 77: From the north side of Pearl Street, looking southeast at the properties south of the Project Site.



View 78: From the north side of Pearl Street, looking southeast at the properties south of the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-14
Photographs of the Surrounding Land Uses
South



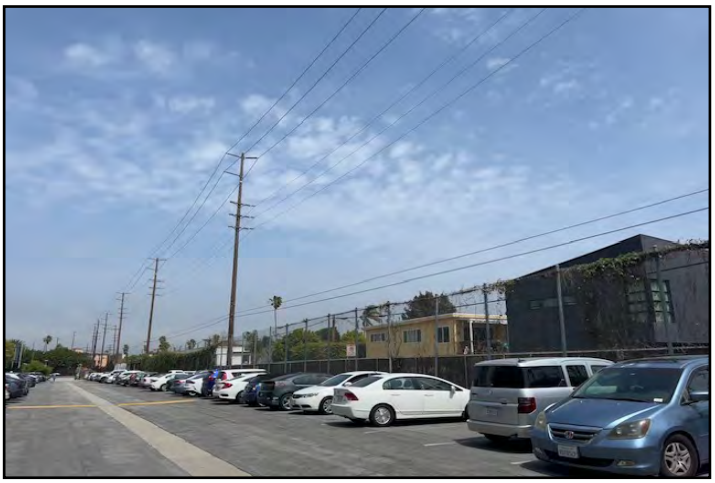
View 79: From the north side of Pearl Street, looking south-east at the properties south and east of the Project Site.



View 80: From the south side of Pearl Street, looking north-east at the properties east of the Project Site.



View 81: From the eastern border of the Project Site, looking northeast at the properties east of the Project Site.



View 82: From the eastern border of the Project Site, looking northeast at the properties east of the Project Site.



View 83: From the north side of Pico Boulevard, looking southeast at the properties east of the Project Site.



View 84: From the south side of Pico Boulevard, looking northeast at the properties northeast of the Project Site.

Source: Parker Environmental Consultants, April 18, 2024.

Figure III-15
Photographs of the Surrounding Land Uses
East

C. Related Projects

Sections 15126 and 15130 of the State CEQA Guidelines require EIRs to consider the significant cumulative environmental effects of a project. As defined in CEQA Guidelines Section 15355, "cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

Cumulative impacts may be analyzed by considering growth assumptions in adopted plans or a list of past, present, and probable future projects producing related or cumulative impacts [CEQA Guidelines Section 15130 (b)(1)(A)]. EIRs may use either approach or employ each approach as warranted to the environmental issue being analyzed.

CEQA Guidelines Section 15130(b) provides that the discussion of cumulative impacts reflect "the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:

1. Either:

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

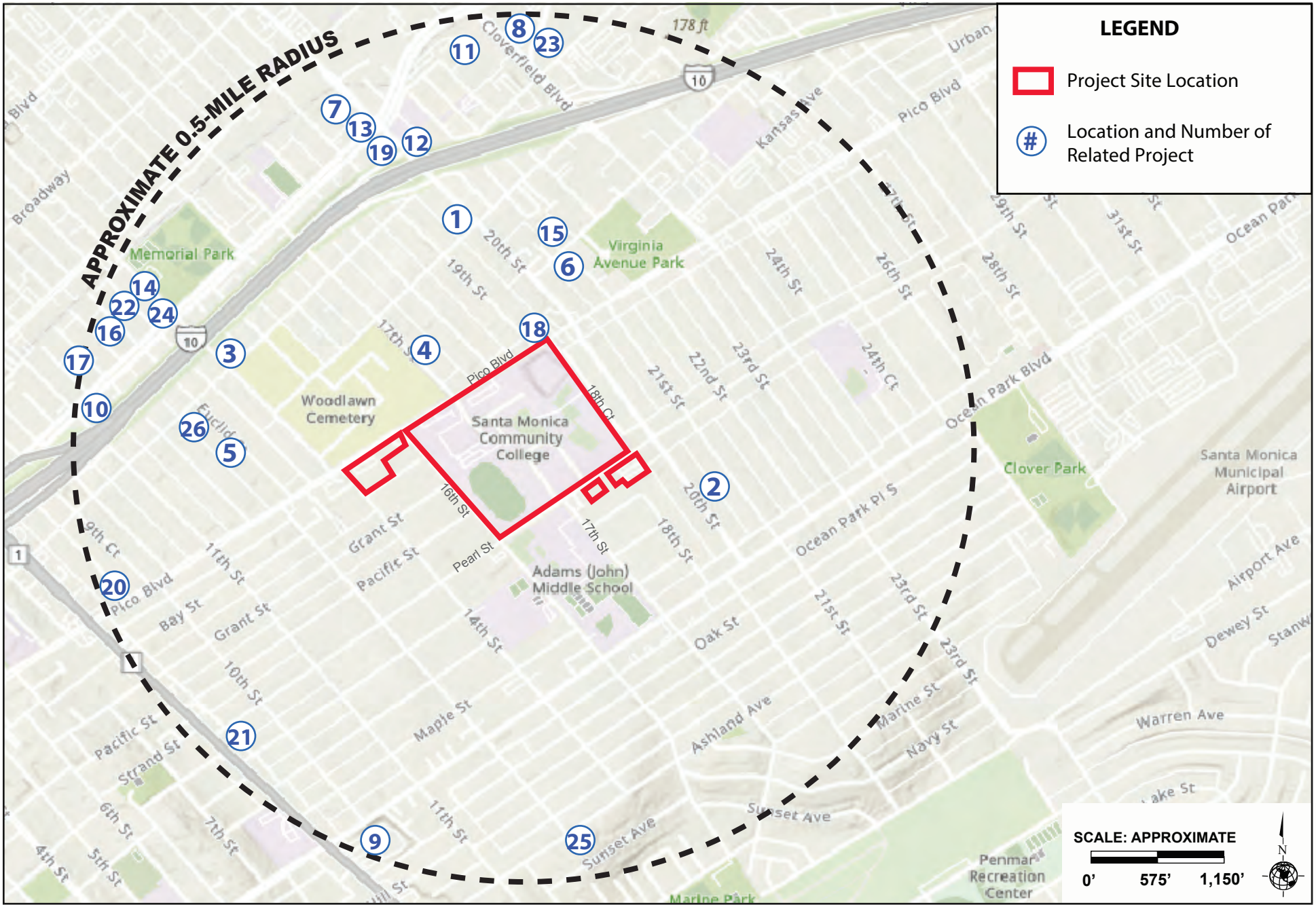
(B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency."

Under this guidance, the Lead Agency has identified a total of 26 pending, recently approved, under construction, or reasonably foreseeable development projects within a one-half mile radius of the Project Site that could be considered related projects with the potential to produce localized cumulative impacts on the environment when considered in conjunction with the Proposed Project. These related projects are identified in Table III-1, Related Projects List, below. The location of each related project is identified in Figure III-16, Related Projects Location Map. In instances where cumulative impacts may be affected by projects located further than one-half mile (such as greenhouse gas emissions, regional air quality impacts, and energy conservation), the cumulative impact analysis is more appropriately addressed through a consistency analysis in accordance with approved planning policies, programs, or ordinances. The cumulative impact analysis is presented under a Cumulative Impact subheading in each respective environmental impact category in Section IV, Environmental Impact Analysis, of this Draft EIR.

Table III-1
Related Projects List

Project Number	Address	Project Description	Size	Units	Status
City of Santa Monica					
1	1900 20th St.	Residential	3	du	Under Construction
2	2425 20th St.	Residential	3	du	Under Construction
3	1413 Michigan Ave.	Residential Commercial	58 36,796	du sf	Under Construction
4	1949 17th St.	Residential	5	du	Approved
5	1902 Euclid St.	Residential	3	du	Approved
6	2002-2008 21st St.	Residential	19	du	Under Construction
7	1634 20th St.	Residential	80	du	Approved
8	1707 Cloverfield Blvd.	Residential Commercial	63 74,665	du sf	Approved
9	2601-2645 Lincoln Blvd	Residential Commercial	521 30,870	du sf	Approved
10	1713 11th St.	Lumber Storage	2,191	sf	Approved
11	1736 22nd St.	Institutional	32,688	sf	Approved
12	1731 20th St.	Institutional	29,356	sf	Approved
13	1674 20th St.	Self-Storage Facility	50,539	sf	Approved
14	1640 14th St.	Commercial	18,750	sf	Approved
15	2033 Virginia Ave.	Commercial	1,000	sf	Approved
16	1650 Euclid St.	Office	39,380	sf	Approved
17	1643 12th St.	Residential	2,609	sf	Approved
18	1819 Pico Blvd.	Residential	48	du	Approved
19	1718 20th St.	Commercial	1,189	sf	Approved
20	901-913 Pico Blvd.	Residential	45	du	Approved
21	2307 Lincoln Blvd.	Residential Commercial	69 1,800	du sf	Pending
22	1645 Euclid St.	Office	35,773	sf	Approved
23	1745 26th St.	Office	26,800	sf	Pending
24	1399 Olympic Blvd.	Residential Commercial	222 9,484	du sf	Pending
25	1230 Ashland Ave.	Residential	8	du	Approved
26	1814 Euclid St.	Residential	4	du	Pending

Notes: du = dwelling unit, sf = square feet
Source: City of Santa Monica, Santa Monica's Housing Progress, accessed January 16, 2025; City of Santa Monica, Major Development Projects, Current Development Tracking List, January 16, 2025.



Source: ArcGIS Maps, 2023.

Figure III-16
Related Projects Location Map

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IV.A AESTHETICS

A. Introduction

This section describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community; identifies applicable laws, regulations, guidelines and policies relating to aesthetics; and evaluates potential aesthetic impacts related to implementation of the Proposed Project. Since the scope of the aesthetics analysis is qualitative in nature, the following terms are defined to provide an objective framework for assessing aesthetic impacts.

1. Scenic Vistas

The term “scenic vista” generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The City of Santa Monica (City) recognizes the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects of valued or recognized views may be focal (meaning of specific individual resources), or panoramic (meaning broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage point or particular angle. Existing views may be focused on a single feature, such as a building or garden, or panoramic encompassing a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

2. Scenic Resources

Scenic resources refer to natural or manmade features of high aesthetic quality. Such features can include landscaping, heritage trees, or natural trees and landforms, as well as historic buildings and other structures with aesthetic value. Pursuant to CEQA Guidelines Appendix G, this area of consideration includes specific mention of such natural or manmade features when they are located within the viewshed of a State scenic highway.

3. Scenic Quality

Scenic quality refers to the visual appeal of an area and is informed by features that contribute to overall aesthetic character. Aesthetic features may include unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. The City has plans, policies and regulations that are relevant to the assessment of scenic quality, such as requirements for street trees, building setbacks, building heights, exterior lighting and signage.

4. Light and Glare

Sources of artificial light that operate during evening and nighttime hours may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses, such as residences and hotels, are considered light-sensitive since they are typically occupied by persons who have an expectation of darkness and privacy during evening hours and who can be disturbed by bright light sources.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Activities, such as driving, and land uses, such as parks and residences, are considered glare sensitive as the presence of glare could interfere with vision and/or result in an irritant to these activities/uses.

5. Shade and Shadow

In an urban environment, shadows are a function of the angle of the sun and the orientation, height, and massing of buildings and other elements of the built environment. The angle of the sun varies based on the time of day (reflecting the rotation of the earth) and the change in seasons (reflecting the orbit of the earth around the sun). The longest shadows are cast during the winter, when the sun reaches its lowest point in the sky, and the shortest shadows are cast during the summer, when the sun reaches its highest point in the sky.

In the Northern Hemisphere, the longest day and the shortest night occur on the summer solstice (typically around June 21), and the shortest day and longest night occur on the winter solstice (typically around December 21). The vernal and autumnal (i.e., spring and fall) equinoxes, on which the day and night are of equal length, occur around March 20 and September 23, respectively, and represent the midway points between the solstices. Thus, measuring shadow lengths during the summer and winter solstices captures the extremes of shadow patterns that occur throughout the year.

Shadow conditions are described with reference to the Theoretical Available Annual Sunlight, the amount of sunlight that would be available in a park or open space in the course of a year if there were no shadows from structures, trees, or other objects. Shadows can provide cooling effects during warm weather. Shadows can also result in loss of natural light necessary for solar energy purposes or the loss of warmth during cool weather. Factors that can influence shadow effects include the local topography, height and bulk of a project's structural elements, sensitivity of adjacent land uses, existing conditions on adjacent land uses, season, and duration of shadow projection. Facilities and operations sensitive to shadow effects include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (i.e., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or

restaurants with outdoor dining areas; nurseries; and existing solar collectors. For these sensitive uses, sunlight can be important to function, physical comfort, or commerce.

B. Environmental Setting

1. Regulatory Framework

There are several laws, regulations, as well as local land use plans that include policies, requirements, and guidelines that relate to Aesthetics at the state and local levels. As described below, these laws, regulations and plans include the following:

- California Scenic Highways
- California Historic Parkways
- California Art Preservation Act
- Certain Elements of the City of Santa Monica General Plan
- Santa Monica Municipal Code (as to lighting)
- Santa Monica College Career & Educational Facilities Master Plan 2010 Update

a) State

1) California Scenic Highways

Appendix G of the CEQA Statute & Guidelines identifies substantial damage to a scenic resource within a California Scenic Highway as a potentially significant impact on the environment. As such the regulations for the establishment and maintenance of State Scenic Highways are set forth in Streets & Highways Code, section 260 et seq. The intent of the system is to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty by identifying those portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. By designating scenic highways, the California Legislature assigns responsibility for the development of such scenic highways and for the establishment and application of specific planning and design standards and procedures appropriate to the location and extent of routes and areas requiring continuing and careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies, in order to protect the social and economic values provided by the State's scenic resources. Streets & Highways Code, Section 263 establishes the system of State Scenic Highways and composes a list of the highways specified under the system.

There are no State Scenic Highways within the City of Santa Monica. The closest State Scenic Highway to the Project Site is the Topanga Canyon State Scenic Highway (State Route 27, between mile markers 1.0 and 3.5) whose boundaries lie within Topanga State Park. Note that road segments that are listed as "eligible" for scenic highway designation in the Scenic Highway System List, such as the Pacific Coast Highway, do not fit the CEQA criteria for State scenic

highways.

2) California Historic Parkways

Streets & Highways Code, Section 280 regulates the designation and maintenance of the system of California Historic Parkways. In order to be designated as a Historic Parkway, a freeway must have: (1) original construction completed prior to 1945; (2) features of historical significance as recognized by the State Office of Historic Preservation, including notable landmarks, historical sites, or natural or human achievements that exist or have occurred during the original construction of the parkway or in the immediately adjacent land area through which the parkway currently passes; (3) any portion of the highway or corridor bound on one or both sides by federal, State, or local parkland, Native American lands or monuments, or other open space, greenbelt areas, natural habitat or wildlife preserves, or similar acreage used for or dedicated to historical or recreational uses; and (4) any portion of the highway traversed, at the time of designation and by Caltrans's best count or estimate using existing information, by not less than 40,000 vehicles per day on an annual daily average basis.

There are no designated Historic Parkways within the City of Santa Monica. The closest designated Historic Parkway to the Project Site is the Arroyo Seco Parkway in the City of Los Angeles (California State Route 110) which runs northeasterly from the four-level interchange with U.S. 101 just outside of downtown Los Angeles (milepost 23.69) to East Glenarm Street in the City of Pasadena (milepost 31.89).

b) City of Santa Monica

1) General Plan

The City of Santa Monica General Plan includes the following elements: Land Use and Circulation Element (LUCE), Housing Element, Open Space Element, Conservation Element, Noise Element, and Safety Element. Santa Monica has also adopted a Historic Preservation Element. In addition to the General Plan, the City has also adopted the Sustainable City Plan, Creative Capital (Santa Monica's cultural arts master plan), the Parks and Recreation Master Plan, and the Urban Forest Master Plan. The elements of the City's General Plan that could inform Aesthetics and the Proposed Project are the LUCE, the Open Space Element, and the Conservation Element.

2) General Plan Land Use and Circulation Element

The City of Santa Monica Land Use and Circulation Element (LUCE), amended in 2023, provides the basic policy direction for the City's development and conservation for the next 20 years. The purpose of the LUCE is to establish the community's vision for the future. Its goal is to provide a flexible framework for long-term decision making that will determine how the community will look and function as it evolves over time.[1] The Land Use Policy and Designations Chapter of the Santa Monica LUCE outlines what is allowed in terms of uses as well as the intensity of development for each parcel of land within the City. Citywide goals and policies are designed to implement the core values of the community that form the basis of the City's land use policy. The following Citywide Land Use Goals and Policies help to inform evaluation of aesthetics and the Proposed Project.

Goal LU4: **Complete Sustainable Neighborhoods** – Create complete neighborhoods that exemplify sustainable living practices with open spaces, green connections, diverse housing, local employment, and local-serving businesses that meet the daily needs of residents and reduce vehicle trips and GHG emissions.

Goal LU12: **Encourage Historic Preservation Citywide –** Preserve buildings and features which characterize and represent the City's rich heritage.

Goal LU13: **Preserve Community Identity –** Preserve and enhance the City's unique character and identity, and support the diversity of neighborhoods, boulevards, and districts within the City.

Goal LU15: **Enhance Santa Monica's Urban Form –** Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.

Goal LU17: **Increase Open Space –** Increase the amount of open space in the City and improve the quality and character of existing open space areas ensuring access for all residents.

Goal LU20: **Promote the Urban Forest –** Maintain a citywide pattern of street trees to reduce greenhouse gases (GHG) and heat gain, provide biodiversity, and provide shade to create a comfortable pedestrian environment.

[1] City of Santa Monica, Planning and Community Development Department, Santa Monica Land Use and Circulation Element, Amended May 2023.

3) General Plan Open Space Element

The City of Santa Monica Open Space Element, adopted in 1997, establishes a long-range vision for the future development of parks and open spaces within the City of Santa Monica. The Open Space Element categorizes open space for the preservation of natural resources, for managed production of resources, for outdoor recreation, and for public health and safety.[2] Open space for outdoor recreation includes, but is not limited to, areas of outstanding scenic historic and cultural value and areas particularly suited for park and recreation purposes including trails and scenic highway corridors. The Open Space Element recognizes the role that schools play in contributing to the community's open spaces. The conversion of paved surfaces into fields and greens and the improvement of school entries as public gathering places is set forth in the policies of the Element. The following Objectives of the Open Space Element help to inform evaluation of aesthetics and the Proposed Project.

Objective 1: Develop and maintain a diversified and balanced system of high-quality open space. A diversity of public open spaces need to be developed and maintained, created by a hierarchy of role and function and balancing the need for natural open spaces, developed parks, public gathering spaces and open space linkages within the community.

Objective 2: Expand the open space system through use of public properties. Many public properties are potentially valuable open space assets, because of their size, location and adjacency to parks. To the extent possible, City lands should be considered for open space, through more efficient use and configuration of existing lands or through shared use. Collaborative planning to expand facility sharing among the City, Santa Monica/Malibu School District, Santa Monica College and other public entities should be given the highest priority.

Objective 7: Clarify City form and structure: Open space is a key element in defining City form and identity. It can help shape the urban landscape and develop a sense of place. Landscape elements can distinguish a community from its neighbors and mark important entry points.

Objective 8: Heighten the sense of nature in the City. Most Santa Monicans place a high value on access to the natural world. However, most of our time is spent within the City – an area where the natural world has been significantly altered. By heightening the sense of nature in the City, the opportunity to forge contacts with natural elements – trees, earth, water, fresh air and sky – is provided to a population increasingly isolated from nature.

[2] City of Santa Monica, Open Space Element, March 1997.

Objective 9: Increase the accessibility of open space. Consideration should be given to enhancing accessibility in the largest sense of the word. It implies physical access and the reduction of barriers; visual access with treatments that punctuate the horizon and increase the legibility of open spaces; as well as environmental access and the need of each park and open space to have access to the sun and a sense of nature.

Objective 10: Incorporate art and cultural events into park design. Art in public places plays an important role in adding depth and meaning to open space. Public art can work at many levels, contributing an enhanced understanding of social context, heightening environmental awareness and clarifying community intent. Public visual art as well as cultural events should be integrated into City open spaces.

4) General Plan Conservation Element

The City of Santa Monica Conservation Element, adopted in 1975, evaluated the City's natural resources as a basis for future decision-making with regard to the City's development.[3] Conservation is defined as the planned management, preparation and wise utilization of natural resources. The following Goals and Objectives of the Conservation Element help to inform evaluation of aesthetics and the Proposed Project.

Goal: Preservation of the ecological balance and natural resources of the city and conservation of the energies and materials without serious interference with community needs.

Objective 1: Preserve areas that should be protected for future generations due to their unique structure, historical importance, and natural beauty.

Goal: A community whose appearance is in harmony with itself and its setting:

Objective 1: Establish certain areas as visually important due to location, architectural or natural beauty, and establish general design criteria for new development in these areas.

Objective 2: Conserve and enhance the appearance of our oceanfront.

[3] City of Santa Monica, Conservation Element, 1975.

c) Urban Forest Master Plan

The City of Santa Monica Urban Forest Master Plan (UFMP), revised in 2017, seeks to increase age and species diversity in the public tree population, augment biomass and canopy coverage citywide, enhance the character and aesthetics of our neighborhoods and achieve exemplary stewardship of the forest from all who live and work in the City. The UFMP establishes guiding principles and associated goals that result in specific strategies for addressing the needs of the urban forest.[4] Additionally, the UFMP states that the urban forest is the aesthetic setting for our schools, businesses, cultural attractions, and places of recreation and renewal.

The Santa Monica Tree Code (7.40) protects trees on public property within the City. The Tree Code states the public's obligation to obtain a permit to plant; remove or maintain any public tree; generally outlaws intentional damage to public trees; and enforces protection of public trees throughout construction activity. The Public Landscape Division is responsible for the management of the City's publicly owned urban forest. The Urban Forest Task Force will evaluate the effectiveness of the goals and strategies of the Master Plan including the Street Tree Designations List, the effectiveness of the public tree removal appeals process and the effectiveness of the public review process for tree relocations and removals in City public improvement projects.

d) Santa Monica Municipal Code

The Santa Monica Municipal Code (SMMC) regulates all aspects of building development in the City, including aesthetic aspects, such as lighting, architectural review, and signage. The code sections applicable to aesthetic concerns include the following:

Chapter 9.21.080 Lighting

1. New Lighting. All new exterior lighting, including lighting fixtures attached to buildings, structures, poles, or self-supporting structures. Exterior lighting may be found on parking lots, walkways, building entrances, outdoor sales areas, landscaping, recreational fields, and building faces.

2. Replacement Lighting. Additions or replacements of existing exterior lighting, including upgrades and replacements of damaged or destroyed fixtures.

   Exemptions

   The following specific types of lighting are exempt from the requirements of this Section:

   1. Lighting required by a health or life safety statute, ordinance or regulation, including emergency lighting; temporary lighting used by law enforcement or emergency services personnel.

[4] City of Santa Monica, Urban Forest Master Plan, 2017.

2. Temporary lighting used for the construction or repair of roadways, utilities, and other public infrastructure.

3. Underwater lighting used in or for the purpose of lighting swimming pools, hot tubs, decorative fountains and other water features.

4. Sign lighting (See SMMC Chapter 9.61, Signs).

5. Security lighting for public facilities, including hospitals.

e) Santa Monica College Career & Educational Facilities Master Plan 2010 Update

The 2010 Master Plan Update incorporates an understanding of SMC, projects future needs and provides for an approach to implementation. It is an update to the 1998 Master Plan. The 2010 Master Plan Update identifies the guiding principles and parameters for future development; promotes sustainability; makes provisions for a superior educational environment; identifies long-term planning goals for SMC facilities that assist the District in preparing students for careers in a global economy, including the teaching of specific curricula; and identifies program improvements for specific projects.

The 2024 Campus Master Plan Update builds on and retains the objectives of the 2010 Master Plan Update.

The 2010 Master Plan Update includes Guiding Principles that describe intent, action, or desired character of the future environment and have served to establish a program and direction for arranging the key design elements on the site and providing a framework to evaluate design solutions.

The following Guiding Principles of the 2010 Master Plan Update help to inform evaluation of aesthetics and the Proposed Project.

Identity

- Image: Celebrate unique assets; express cultural diversity; establish each campus as a jewel in a system of citywide educational resources
- Visibility: Prominent arrival and entry sequence; legible signage and wayfinding graphics

Land Use

- Organize campus with zones of development: Commercial, recreational, academic, student activity zone
- Invigorate heart of campuses

Open Space

- Balance built and open space
- Ensure a variety of open space sizes and uses
- Create a hierarchy of open space and pathways
- Promote connectivity with clear and distinct linkages
- Use open space and landscape as organizing elements

2. Existing Conditions

a) Scenic Vistas

Scenic vistas may be generally described as panoramic views of a large geographic area for which the field of view can be wide and extend into the distance. Scenic vistas are also often associated with vantage points that provide an orientation not commonly available. Examples of scenic vistas include urban skylines, valleys, mountain ranges, or large bodies of water.

The Project Site is currently developed with the SMC Main Campus. 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. For reference, photographs of the Project Site and surrounding area are provided in Section III, Environmental Setting. (see Figure III-1 through III-15). There are no scenic views or vistas within the Project area. The Project Site is not located within or adjacent to a State-designated scenic highway. The nearest Officially Designated State Scenic Highway to the Project Site is Topanga Canyon (from State Route 1 to Mulholland Highway).[5],[6] Topanga Canyon is located approximately 6.25 miles from the SMC Main Campus. The segment of State Route 1 (Lincoln Boulevard) between Venice Boulevard and the I-10 Freeway is designated as an Eligible State Scenic Highway. However, the SMC Main Campus is not within the viewshed of Lincoln Boulevard.

b) Scenic Resources

Scenic resources typically involve prominent, unique, and identifiable natural features in the environment (e.g., trees, rock outcroppings, islands, ridgelines, and aesthetically appealing open spaces) and cultural features or resources (e.g., regional or architecturally distinctive buildings or structures that serve as focal points of interest). Scenic visual resources can be of either natural or urban features that contribute to the overall visual character of the area. Natural features that may be scenic visual resources include open space, vegetation and landscaping, topographic and geologic features, and natural water sources. Urban features that may be scenic visual

[5] Caltrans, Arc GIS database of California Scenic Highways, https://www.arcgis.com/apps/mapviewer/index.html?layers=f0259b1ad0fe4093a5604c9b838a486a, accessed January 2025.

[6] Caltrans, Scenic Highway System Lists, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed January 2025.

resources consist of structures of architectural or historical significance or visual prominence, building design and façade treatments, transportation facilities, overhead utility structures and lighting, public plazas, art gardens, trees and plants protected by the City, consistent design elements along a street or district, pedestrian amenities, and landscaped or park areas.

As mentioned above, the Project Site is currently developed with the SMC Main Campus. 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, institutional, and cemetery land uses that surround the Project Site. The Project Site is visible from the following adjacent streets: Pico Boulevard, Pearl Street, 16th Street, 14th Street, and 18th Court. The City of Santa Monica Woodlawn Cemetery is considered a scenic resource/area adjacent to the Project Site. The Woodlawn Cemetery is located north of the Project Site, across Pico Boulevard. Development of the Proposed Project would not directly impact or adversely affect views of the Woodlawn Cemetery. Additionally, because of the density of the existing buildings on the SMC Main Campus, views of any potential scenic resource would not be visible from or across the Project Site.

c) Visual Character/Scenic Quality

"Visual character" in the CEQA context is an impartial description of the defining physical features, landscape patterns, and distinctive physical qualities within a landscape. Visual character is informed by the composition of land, vegetation, water, and structures and their relationship (or dominance) to one another, and by prominent elements of form, line, color, and texture that combine to define the composition of visual character. Changes in visual character can be identified by how visually compatible a project would be with the existing condition by using visual character attributes as an indicator.

The Project Site is located in a highly urbanized area within the City of Santa Monica. Land uses surrounding the Project Site include a mix of commercial, office, residential, motel, religious, restaurant, gas station, cemetery, and educational land uses. Figure II-4 depicts an aerial photograph of the Project Site and labels the surrounding land uses. Figures III-12 through III-15 depict views of the land uses surrounding the Project Site. The public streets surrounding the Project Site include Pico Boulevard, 14th Street, 16th Street, Pearl Street, and 18th Court.

The following discussion provides detailed descriptions of the visual character of land uses and public streets immediately adjacent to the Project Site.

1) Pico Boulevard

The Pico Boulevard corridor is located north of the Project Site. The portion of Pico Boulevard adjacent to the Project Site consists of a mix of land uses including residential, commercial, office, restaurant, and cemetery uses. The buildings fronting Pico Boulevard range from one- to four-stories in height.

2) 14th Street and 16th Street

14th Street and 16th Street are adjacent to the Project Site on the west. Fronting both 14th Street and 16th Street are single-family and multi-family residential properties ranging in height from one- to two-stories. There is a single-story motel fronting 14th Street.

3) Pearl Street

Pearl Street is located south of the Project Site and consists of institutional and residential land uses adjacent to the Project Site. The Santa Monica LDS Institute is a one-story building south of the Project Site fronting Pearl Street. John Adams Middle School is also located south of the Project Site and ranges in height from one- to two-stories. The Church on Pearl is also located south of the Project Site and ranges in height from one- to two-stories. There are single-family residential buildings adjacent to the Project Site fronting Pearl Street which range from one- to two-stories in height.

4) 18th Court

18th Court is adjacent to the Project Site on the east. Multi-family residential buildings front 18th Court.

3. Project Site

The SMC Main Campus is currently developed with 1,065,931 square feet of existing gross floor area and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. A detailed inventory of the existing buildings and facilities is provided in Chapter II. Project Description, Table II-2, Existing Development On-Site (2025 Baseline). Figure II-3, Existing Development On-Site, provides a building location map. As shown in Figure II-4, Aerial Photograph of the Project Site and Surrounding Land Uses, there are currently two ongoing building projects on the Project Site that are currently under construction. These active projects include Building 9, the new Math and Science building, which is expected to open by late 2024 and the new Art Replacement building (labeled as Building TBD in Table II-2 and Figure II-3), which is expected to open by late 2025. The environmental analysis in this EIR assumes a 2025 baseline for existing uses on the Project Site, which includes completion and full buildout of these two ongoing projects.

1) Views of, Through, Toward, and From the Project Site

Public views are those that can be seen from vantage points which are publicly accessible, such as streets, freeways, parks, and vista points. Public vantage points within the Project vicinity include those views from the public streets in the vicinity of the Project Site, including Pico Boulevard, 18th Court, Pearl Street, 17th Street, 16th Street, and 14th Street. The majority of the views from these public streets are short in range and are generally limited to the immediate surrounding development given that surrounding development blocks longer range views.

A site survey of the Main Campus was conducted on April 18, 2024, to identify and document the existing visual quality and character of the area. Figures III-2, III-3, III-4, and III-5 depict a cross-section of visual images and information about the existing aesthetic conditions of the Project Site. Figure III-2 (Views 1-6) depicts the existing view looking southeast toward the northern perimeter of the Project Site from Pico Boulevard. Figure III-3 (Views 7-12) shows the existing view looking southeast toward the western perimeter of the Project Site from Pico Boulevard and 16th Street. Figure III-4 (Views 13-18) details the existing view looking northeast toward the southern Perimeter of the Project Site from Pearl Street. Figure III-5 (Views 19-24) portrays the existing view looking northwest toward the eastern perimeter of the Project Site from Pearl Street and the eastern surface parking lot on the Project Site. These locations represent publicly accessible views of the Project Site that may be seen by a variety of observers in the area, including pedestrians walking along sidewalks. As the topography in the Project Site vicinity is generally level, elevated vantage points are limited to views from adjacent mid-rise multi-family residential buildings. These views are considered private views as they are only available from vantage points located on private property. As summarized above, there are various publicly accessible locations in the Santa Monica area with views toward and/or through the Project Site.

2) Light and Glare

In CEQA context, light is nighttime illumination that stimulates sight and makes things visible, and glare is difficulty seeing in the presence of bright light such as direct or reflected sunlight.

Nighttime illumination of varying intensities is a characteristic of most urban and suburban land uses, including those in the City of Santa Monica, which is highly urbanized and is characterized by medium to high ambient nighttime artificial light levels. During nighttime hours, the surrounding area in the vicinity of the Project Site typically uses moderate levels of interior and exterior lighting for street lighting, security, parking, billboards, signage, architectural highlighting, and landscaping purposes. Traffic on local streets also contributes to the overall ambient artificial light levels in the area. Buildings with reflective surfaces such as glass and metal also produce sources of glare in the Project Site's vicinity.

The Project Site is currently developed with the SMC Main Campus and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. For safety purposes, nighttime lighting occurring outdoors within the Project Site currently comprises traffic lights, pedestrian circulation lighting, wayfinding pole-mounted lighting, and lighting within the parking garages and surface parking lots.

The Main Campus has a variety of architectural styles. Glare at the Project Site is limited to glass, windows, metal, and the sun's brief reflection on passing vehicles. The concrete hardscapes of the remainder of the Project Site do not have reflective qualities and do not produce daytime glare. Surrounding land uses developed with buildings utilizing reflective materials may reflect glare into the Project Site.

3) Shade and Shadow

As described above, the City of Santa Monica is highly urbanized. Given the density and number of mid-rise buildings and the number of mature trees throughout the area, shadow is a common and expected occurrence. Facilities and operations sensitive to the effects of shading include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses. The surrounding commercial, office, restaurant, parking, , and gas station uses do not possess outdoor areas that could be routinely used as outdoor spaces as they are not associated with residential, recreational, or institutional land uses. However, there are residential, cemetery, and institutional uses in the vicinity of the Project Site, which are sensitive to shadow effects. Within the Project Site, the existing buildings on the SMC Main Campus contribute to localized shade and shadow effects.

C. Thresholds of Significance

According to the State CEQA Guidelines Appendix G, aesthetics impacts resulting from the implementation of the Proposed Project would be considered significant if the Proposed Project would:

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

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway;

c) In non-urbanized areas, 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; or

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

D. Methodology

Proposed Project impacts related to aesthetics and visual resources (scenic vistas/resource, visual character/scenic quality, light, glare and shadow) were evaluated through visual site reconnaissance and review of applicable plans and policies. The Project Site and surrounding area was visually surveyed on April 18, 2024, and the site conditions were documented through photographs.

1. Scenic Vistas and Resources

As stated in threshold c) above, the determination of whether a project would substantially degrade the existing visual character or quality of public views of the site and its surroundings is based on whether a project is located in an urbanized or non-urbanized setting. For urbanized areas, the impact determination is appropriately based on whether the project would conflict with applicable policies and regulations governing urban design and protection of scenic resources. The City of Santa Monica General Plan and Municipal Code were reviewed to help inform policies and design criteria for the Proposed Project. Section 3.2 (Guiding Principles) and 4.5 (Campus Open Space Concept) from SMC's 2010 Career & Educational Facilities Master Plan 2010 Update are also useful. Impacts were determined by comparing existing views and visual character as seen from publicly accessible locations to views and visual character that would result from Proposed Project implementation and determining if an adverse change would occur.

2. Light and Glare

New nighttime light sources can potentially result in spillover of light onto adjacent properties and create a nuisance. Spillover of light has the potential to interfere with certain functions, such as vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of such impact is determined by the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Land uses that are considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas. These land uses are typically occupied by persons who have expectations of privacy during evening hours and who are subject to disturbance by bright light sources (or in the case of natural areas, biological resources that are subject to disturbance by bright light sources). The analysis of light and glare evaluates the existing level of nighttime urban lighting in the vicinity and assesses the potential for Proposed Project-related nighttime lighting sources to impact nearby light-sensitive uses.

Daytime glare is caused by the reflection of sunlight or artificial light from highly reflective surfaces, such as window glass or polished materials. Broad expanses of light-colored surfaces also have the potential to reflect sunlight and cause glare. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles and glare resulting from reflected sunlight can occur regularly at certain times of the year. The analysis of glare assesses the Proposed Project's potential impact on glare-sensitive uses, which include light-sensitive uses and transportation corridors such as roadways.

3. Shade and Shadow

Sensitive uses to shade and shadow impacts include routinely usable outdoor spaces associated with recreational or institutional uses, commercial uses such as pedestrian-oriented outdoor

spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors.[7] These uses are considered sensitive, because sunlight is important to function, physical comfort, or commerce. The evaluation includes shadow that would occur on the winter solstice (December 21) between 9:00 a.m. and 3:00 p.m. Pacific Standard Time and on the spring equinox (June 21), summer solstice (September 22), and fall equinox (March 21) between 9:00 a.m. and 5:00 p.m. Pacific Daylight Time. A project would have a significant impact if the shadow shaded by project-related structures lasts for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early March and early November).

For the purpose of establishing the hours in which significant impacts may occur, winter is described as occurring during Pacific Standard Time, which occurs between the first Sunday of November through the second Sunday in March; and spring, summer, and fall are described as occurring during Pacific Daylight Time, which occurs between the second Sunday in March and the first Sunday of November.

E. Project Impacts

Threshold a) Would the Project have a substantial effect on a scenic vista?

1. Impact Analysis

A significant impact would occur if the Proposed Project would have a substantial adverse effect on a scenic vista. 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.

2. Mitigation Measures

No mitigation measures are required.

3. Level of Significance After Mitigation

As no impacts to scenic vistas would occur no mitigation measures are required.

[7] City of Santa Monica Land Use and Circulation Element Final Environmental Impact Report, June 2010.

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?

1. Impact Analysis

The Project Site is developed with educational buildings, improved pedestrian pathways, open space courtyards and plazas, parking structure and surface parking lots, and supporting facilities such as an outdoor swimming pool and the Corsair track and field. The Project Site does contain scenic visual resources such as 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 such, the Proposed Project would have no impact related to scenic resources within a scenic highway.

1. Mitigation Measures

No mitigation measures are required.

2. Level of Significance After Mitigation

As no impacts to scenic resources would occur no mitigation measures are required.

Threshold c: Would the project conflict with applicable zoning and other regulations governing scenic quality?

1. Impact Analysis

1) Construction

The Proposed Project would involve intermittent and temporary construction activities within the Main Campus that would have the potential to create unsightly views which can negatively affect the environment. While much of the planned construction activity would be internal to the SMC Main Campus and would not be visible from the surrounding areas, some demolition and construction activities are located along the Pico Boulevard and Peal Street frontages and thus would be visible to surrounding land uses and passing motorists. The Proposed Project include the demolition of Dresher Hall, Pico Village, and Pico Classroom Complex, which are prominently seen from the Pico Boulevard corridor. The Proposed Project would also involve demolition of the Math Complex, the Maintenance and Operations Extension building, and single-family homes along 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.

2) Operation

The Proposed Project includes the demolition of existing temporary and permanent buildings, and the new construction of 265,216 gross square feet of building area including the Pico 1 Business Replacement Building, the Pico 2 Dresher Hall Replacement Building, a new police headquarters, a new student union, a new maintenance and operations facility, and replacement structures along Peal Street. An overview of the campus architecture and the scale and massing of the proposed replacement structures is provided in Section II, Project Description. In addition to the structural buildings, the Master Plan Update would include the development of six collaborative and complementary open space areas, comprising a total of approximately 90,000 square feet of new or repurposed and re-envisioned open space areas.

While detailed architectural renderings are not included within the 2024 Master Plan Update, the Plan provides general locations and scale and massing of structural replacement buildings to be implemented in three development endpoints. For purposes of providing a contextual overview of visual impacts, Figures IV.A-1 through IV. A-5 provide illustrative renderings of the proposed building locations, structural setbacks, and building height envelopes relative to the surrounding urban environment.

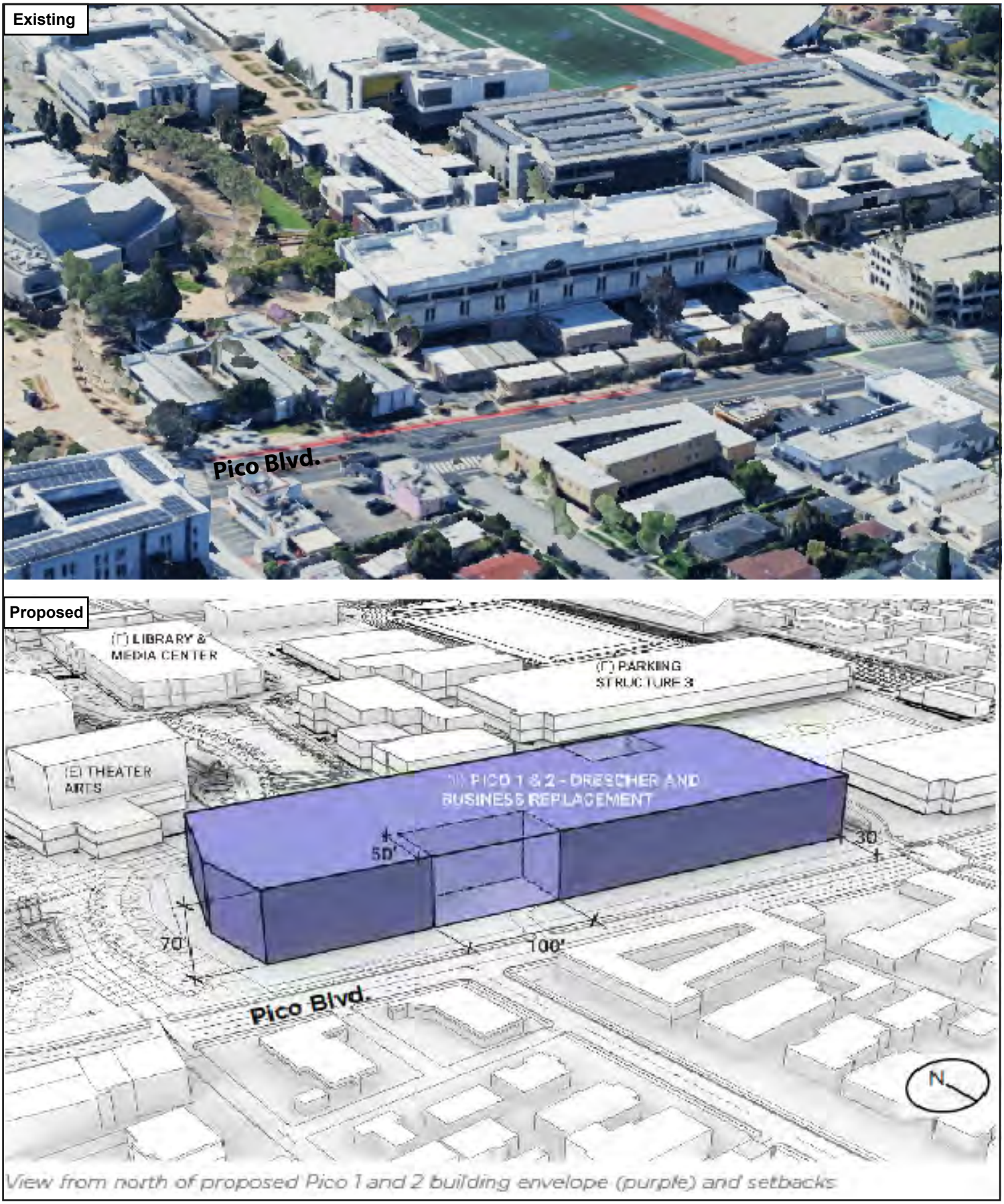
The Pico 1 and 2 Replacement Buildings would have a maximum height of 70’ and allow up to 4 stories. This scale is needed to house the academic and student centered functions planned for this location. To prevent the feeling of an imposing building, the design can terrace the upper floors and allow for visual transition. The Pico 1 and 2 Replacement Buildings would be set back 30 feet from the Pico Boulevard curb to prevent these large buildings from encroaching on the public realm. Currently, Drescher Hall appears to loom over pedestrians. To prevent this, the buildings will be set back and have intentional cut outs. Exact locations and dimensions of proposed open spaces can be flexible with future building architecture. These buildings are located along Pico Boulevard, and would replace existing buildings, and would therefore not cast new shadows on any sensitive land uses. See Figure IV.A-1 – Views of Existing and Proposed Pico 1 and 2 Buildings.

The Campus Police Headquarters building would have a maximum height of 35 feet, while the smaller building to the east transitions to a maximum height of 25 feet. This change in scale would allow for a seamless transition to the neighboring buildings while also providing visual interest while moving down Pearl Street. See Figure IV.A-2 – Views of Existing and Proposed Police Headquarters.

The new Maintenance and Operations building would replace the existing Math Complex. The new Maintenance and Operations building will be a maximum of 30 feet in height to match the existing context and will blend seamlessly into the existing campus. See Figure IV.A-3 – Views of Existing and Proposed Maintenance and Operations.

The new Student Union would replace the existing Student Health & Activities building and would be a maximum height of 50 feet. This building envelope respects the existing fabric of the interior of the campus and fits proportionally with its surrounding context. See Figure IV.A-4 – Views of Existing and Proposed Student Union.

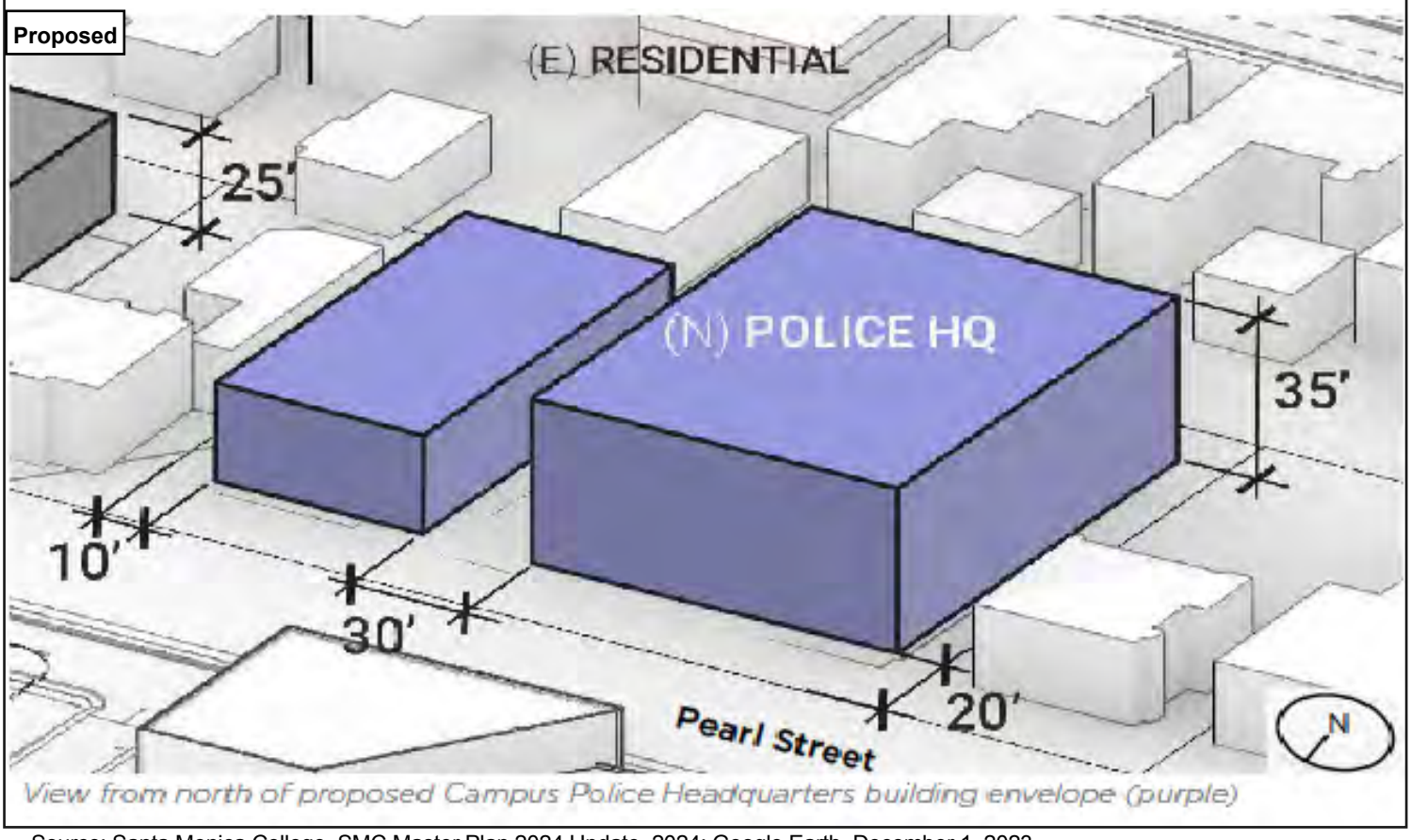
The new Pearl Street replacement buildings would have a maximum building height of 25 feet to respect the height of the neighboring residential homes and blend into the urban fabric surrounding the SMC campus. See Figure IV.A-5 – Views of Existing and Proposed Pearl Street Replacement Buildings.



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024; Google Earth, December 1, 2023.

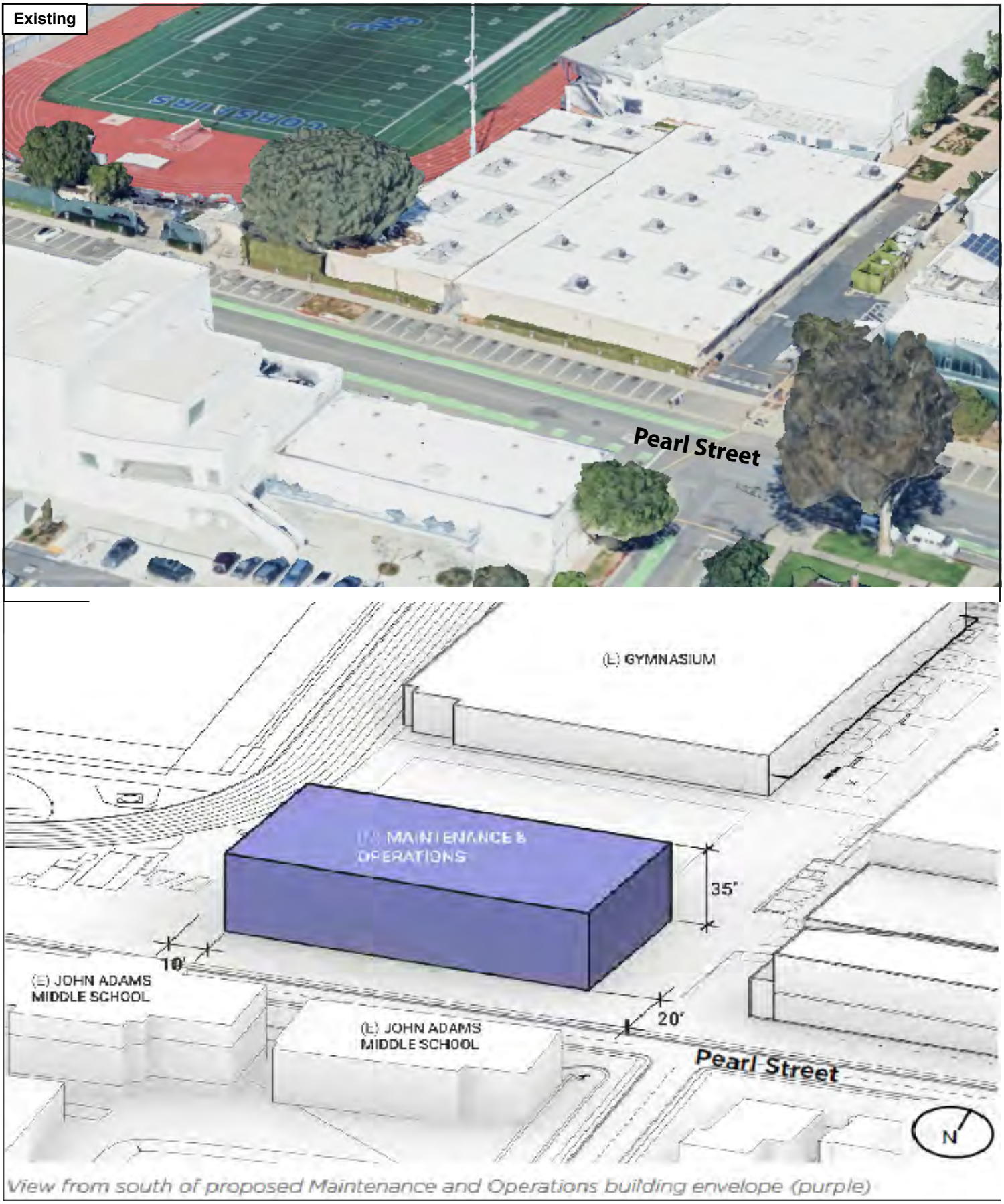
Figure IV.A-1
Views of Existing and Proposed Pico 1 and 2 Buildings





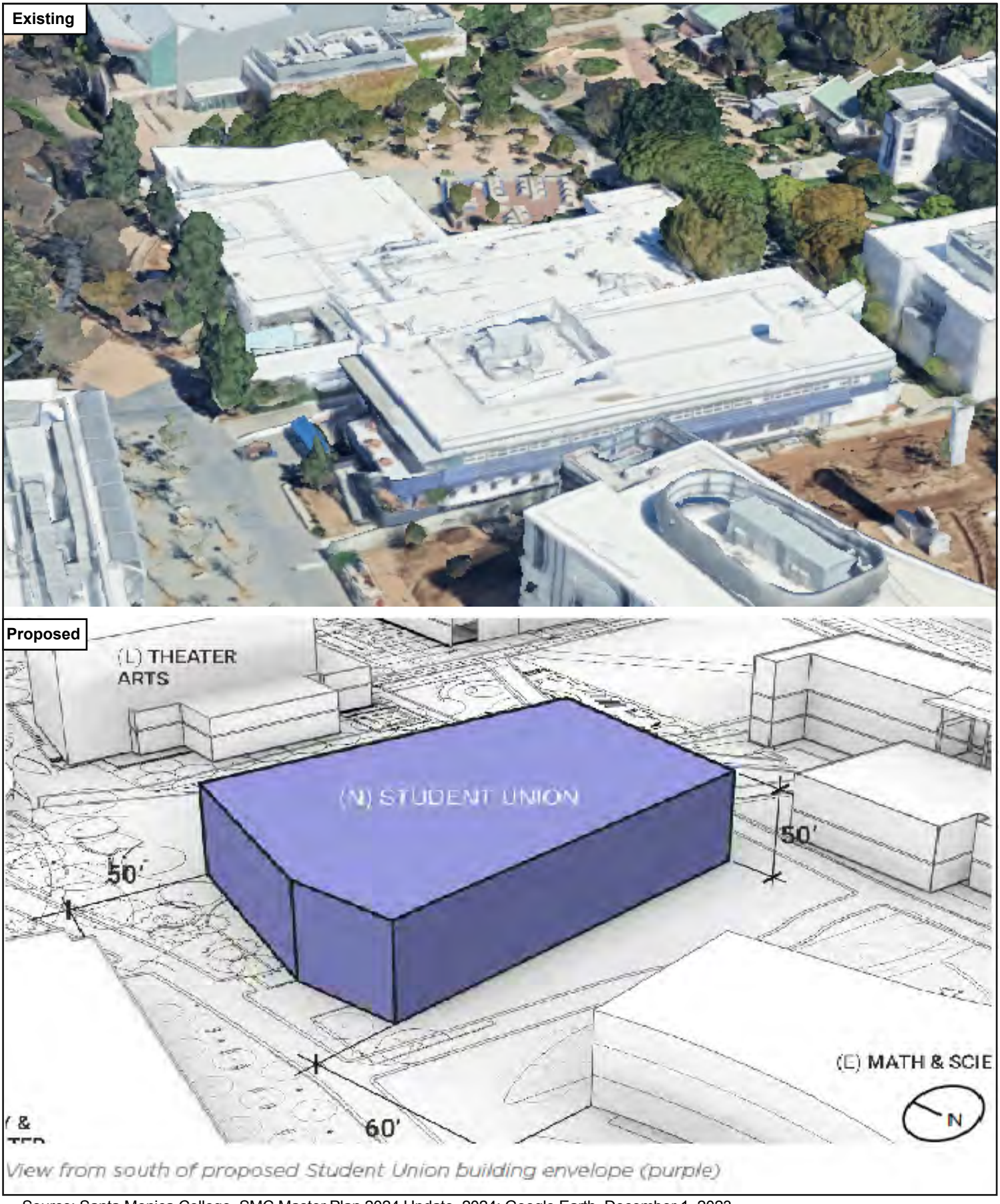
Source: Santa Monica College, SMC Master Plan 2024 Update, 2024; Google Earth, December 1, 2023.

Figure IV.A-2
Views of Existing and Proposed Police Headquarters



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024; Google Earth, December 1, 2023.

Figure IV.A-3
Views of Existing and Proposed Maintenance and Operations



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024; Google Earth, December 1, 2023.

Figure IV.A-4
Views of Existing and Proposed Student Union



Source: Santa Monica College, SMC Master Plan 2024 Update, 2024; Google Earth, December 1, 2023.

Figure IV.A-5
Views of Existing and Proposed Pearl Street Replacement Buildings

i) City of Santa Monica LUCE Consistency Analysis

The Land Use Policy and Designations Chapter of the Santa Monica LUCE outlines what is allowed in terms of uses as well as the intensity of development for each parcel of land within the City. 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.

Table IV.A-1, below, details the consistency of the Proposed Project with the applicable aesthetic policies of the LUCE, including visual and physical permeability, pedestrian connectivity, building articulation, provision of open space, and other aesthetic objectives.

Table IV.A-1
Proposed Project Consistency with Guidance from
City-Wide Design Goals and Policies of the LUCE

LUCE Goals and Policies	Consistency Analysis
Goal LU15: Enhance Santa Monica's Urban Form. Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.	**No Conflict.** The Proposed Project would enhance Santa Monica's urban form by modernizing older academic and student spaces; replacing or renovating buildings in critical condition; demolishing temporary and modular buildings; and activating Pico Boulevard and Pearl Street. The new buildings would be designed in a manner that is respectful to the adjacent land uses, specifically the surrounding residential neighborhoods. The Proposed Project would create a comfortable pedestrian environment by introducing new landscaping and open spaces areas within the Campus and by providing additional landscaping along Pico Boulevard. Thus, the Proposed Project would enhance the surrounding urban environment and would not conflict with this goal.
Policy LU 15.3: Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City's rich urban character.	**No Conflict.** The Project Site is currently improved with the SMC college campus and reflects a variety of architectural styles due to its intermittent redevelopment over the years since the campus was originally planned and developed. The Proposed Project would include renovations, structural upgrades, demolition, and new construction that is consistent with the existing form context of the Project Site and surrounding uses. New construction and renovations would be designed in a manner that is similar in size and scale to the existing buildings on the Main Campus. Therefore, the Proposed Project would ensure context-sensitive design by remaining compatible with the existing surrounding area.

Policy LU 15.4: Open and Inviting Development. Encourage new development to be open and inviting with visual and physical permeability, connections to the existing street and pedestrian network, and connections to the neighborhoods and the broader community.	**No Conflict.** The Proposed Project involves an overall reduction of gsf and includes a pedestrian circulation plan which proposes improving the 16th Street connection to campus to provide a clear and distinct access route to campus for both maintenance and operations staff, as well as other SMC staff, students, and visitors. Additionally, a secondary north-south pedestrian route paralleling the existing primary route would move users from Drescher Hall on the north to Pearl Street on the South. The construction of a new Student Union and Amphitheater will reinvigorate the heart of campus and open up east west pedestrian flow into the Main Quad. The Proposed Project would include landscaped open space areas and would enhance Pico Boulevard with additional landscaping to be well branded and welcoming. Therefore, the Proposed Project would not conflict with this policy.
Policy LU 15.8: Building Articulation. Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.	**No Conflict.** See Response to Policy LU15.11, below with respect to building façades and step backs. Additionally, highly reflective materials and dark or reflective glass would be avoided. The architectural style and placement of buildings will be refined during future design processes but would include a balanced and compatible mix of architectural materials and elements. Therefore, the Proposed Project would not conflict with this policy.
Policy LU 15.9: Pedestrian-Oriented Design. Buildings should incorporate pedestrian-scaled elements with durable, quality materials and detailing located on the lower stories adjacent to the pedestrian.	**No Conflict.** See Response to Policy LU15.4, above.
Policy LU 15.10: Roofline Variation. Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.	**No Conflict.** See Response to Policy LU15.11, below.

Policy LU15.11: Building Façades and Step Backs. Buildings should generally conform to the minimum and maximum requirements for the street façade height established for their designated area. Portions of a building façade higher than the street frontage, 35 feet for most mixed-use areas, shall step back from the façade of the floor below in a manner that will minimize the visual bulk of the overall building as viewed from the public sidewalks and roadway and ensure maximum light, air and sense of openness for the general public. Guidelines or standards for the building mass above the street wall shall be established in the zoning ordinance.	**No Conflict.** The Pico 1 and Pico 2 Buildings will be set back 30 feet from the curb and have intentional cut outs to prevent these large buildings from encroaching on the public realm. The Campus Police Headquarters is set back 20 feet from the curb to match the existing context. The main police building on the west of the lot will have a maximum of 35 feet, while the smaller building to the east transitions to a maximum height of 25 feet. This change in scale allows for a seamless transition to the neighboring buildings. The Maintenance and Operations building will be set back 20 feet from Pearl Street to allow a landscaping buffer and to match the existing context and will be a maximum of 30 feet to match the existing context and allow the M&O building to blend seamlessly into the existing campus. The Student Union would provide generous setbacks (none lower than 40' from a neighboring building) and will be a maximum height of 50 feet to respect the existing fabric of the campus and to fit proportionally with its surrounding context. The Pearl Street Replacement Buildings will be set back 20 feet from the street edge to match the existing context currently on Pearl Street. The buildings will have a maximum height of 25 feet to respect the height of the neighboring residential homes and blend into the urban fabric surrounding the SMC campus. Therefore, the Proposed Project would be consistent with this policy.
Policy LU16.1: Design Buildings with Consideration of Solar Patterns. In designing new buildings, consider the pattern of the sun and the potential impact of building mass on habitable outdoor spaces and adjacent structures in order to minimize shadows on public spaces at times of the day and year when warmth is desired, and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.	**No Conflict.** The five new major buildings proposed would be designed so as to not result in significant solar disruption on adjacent properties. As detailed above in response to Policy LU15.11, the various proposed buildings will have different heights and setbacks which would blend into the urban fabric of the remainder of the SMC Main Campus and surrounding area. Therefore, the Proposed Project has considered the pattern of the sun and the potential impact of building mass on habitable outdoor spaces and adjacent structures and the Proposed Project would not conflict with this policy.
Goal LU17: Increase Open Space – Increase the amount of open space in the City and improve the quality and character of existing open space areas ensuring access for all residents. **Policy LU 17.1: New Facilities Ground Floor Open Space.** Encourage new ground level open space in the City and improve the quality and character of existing open space areas ensuring access for all residents.	**No Conflict.** The Proposed Project would include the development of six separate open space areas within the Main Campus: (1) Student Union Landscaping, (2) Art Complex Building Site – Welcome Lawn, (3) Amphitheater, (4) Science Quad, (5) The Tri, (6) New Quad, which totals approximately 90,000 square feet of new open space area. Additional existing open spaces areas on the Project Site include the Corsair Field and the community swimming pools, which will remain with implementation of the Proposed Project. The proposed open spaces areas will be located on the ground floor and will be landscaped, which will improve the quality and character of the Project Site. Therefore, the Proposed Project would not conflict with this goal and policy.
Source: City of Santa Monica, Land Use and Circulation Element, Adopted July 6, 2010, amended May 2023.	

ii) City of Santa Monica Open Space Element Consistency Analysis

The City of Santa Monica's Open Space Element recognizes the role that schools play in contributing to the community's open spaces. Table IV.A-2, below, details the Proposed Project's consistency with the objectives of the Open Space Element that are applicable to aesthetics and the Proposed Project.

Table IV.A-2
Proposed Project Consistency with Guidance from
Objectives of the City's Open Space Element

Objectives/Guiding Principles	Consistency Analysis
City of Santa Monica Open Space Element	
Objective 1: Develop and maintain a diversified and balanced system of high-quality open space.	**No Conflict.** The Proposed Project would include the development of six separate open space areas within the Main Campus which totals approximately 90,000 square feet of new open space area. Additional existing open spaces areas on the Project Site include the Corsair Field and the community swimming pools, which will remain with implementation of the Proposed Project. The proposed open spaces areas will be landscaped and will provide high-quality public gathering spaces and open space linkages within the SMC Main Campus. Therefore, the Proposed Project would be consistent with and would further and advance this objective.
Objective 2: Expand the open space system through use of public properties.	**No Conflict.** The Project Site is currently operational with the SMC Main Campus for educational uses. The Open Space Element notes that collaborative planning to expand facility sharing among the City and Santa Monica College and other public entities should be given the highest priority. The Proposed Project is consistent with this objective as it provides additional open space for the City and the SMC Campus community.
Objective 7: Clarify City form and structure.	**No Conflict.** The Proposed Project would include landscaped open space areas and would enhance Pico Boulevard with additional landscaping to be well branded and welcoming. The Proposed Project would include a landscaped welcome lawn as a campus gateway. Additionally, the Student Union landscaping will also create connections with the adjacent outdoor amphitheater. An event plaza will bridge the Main Quad and the future Amphitheater, adding energy and capacity to the already-vibrant heart of campus. Therefore, the Proposed Project would be consistent with this objective.
Objective 8: Heighten the sense of nature in the City.	**No Conflict.** The Proposed Project would heighten the sense of nature throughout the SMC Main Campus by cultivating six open space areas totaling approximately 90,000 square feet of new open space area. Therefore, the Proposed Project would advance and be consistent with this objective.

Objective 9: Increase the accessibility of open space.	**No Conflict.** The proposed open spaces areas would be accessible to all students, staff, faculty, and visitors of the SMC Campus. The open space areas would serve multiple purposes through their functionality including pedestrian use, active learning, recreation, social interaction, club spaces, and circulation. Therefore, the Proposed Project would further this objective.
Objective 10: Incorporate art and cultural events into park design.	**No Conflict.** The Proposed Project would include an amphitheater as a multi-use outdoor venue intended to serve both the Santa Monica College student and teaching functions. The covered amphitheater will accommodate artistic and cultural events while also serving as an informal flexible shaded space for student socializing when events are not taking place. Exact siting and design of the facility will be determined during the design phase, but the amphitheater will enjoy adjacencies to the proposed Student Union and the Main Quad as a new campus focal point. The proposed amphitheater has potential to be implemented as part of the Student Union project or as a standalone project. A structural covering will help protect from sun and rain as well as define the space. In this way, the Proposed Project would be consistent with this objective.
Source: City of Santa Monica, Open Space Element, 1997.	

iii) City of Santa Monica Urban Forest Master Plan

The Urban Forest Master Plan (UFMP) establishes guiding principles and associated goals that result in specific strategies for addressing the needs of the urban forest.[8] Additionally, the UFMP states that the urban forest is the aesthetic setting for our schools, businesses, cultural attractions, and places of recreation and renewal. The Santa Monica Tree Code (7.40) protects trees on the City's public property. The Proposed Project would not result in the removal of any street trees within the public right-of-way.

The Proposed Project includes the development of six separate open space areas within the Main Campus, which totals approximately 90,000 square feet of new open space area. The 2024 Master Plan Update would result in an overall reduction in structural building area and an overall increase in open space and landscaping areas including the planting of new trees. Therefore, the Proposed Project would include increase the urban forest within the Campus and would be consistent with the intent and objectives of the Urban Forest Master Plan.

[8] City of Santa Monica, Urban Forest Master Plan, 2017.

iv) SMC 2010 Career and Educational Facilities Master Plan Update

SMC's 2010 Career and Educational Facilities Master Plan Update identifies several objectives and guiding principles relating to open space and aesthetics. Table IV.A-3, below, details the Proposed Project's consistency with the objectives of the 2010 Career and Educational Facilities Master Plan Update that are applicable to aesthetics and the Proposed Project.

Table IV.A-3
Proposed Project Consistency with Guidance from SMC's 2010 Career & Educational Facilities Master Plan Update

Objectives/Guiding Principles	Consistency Analysis
Santa Monica College Career & Educational Facilities Master Plan 2010 Update	
Guiding Principle: Balance built and open space.	**No Conflict.** The Proposed Project would include the demolition of certain existing temporary and permanent buildings, totaling approximately 360,100 gsf of building area, and the construction of new replacement buildings consisting of 265,216 gsf of new floor area. The Proposed Project would include the development of approximately 90,000 square feet of new open space area. Additional existing open spaces areas on the Project Site include the Corsair Field and the community swimming pools, which will remain with implementation of the Proposed Project. Therefore, the Proposed Project would include a balance of built and open space and would be consistent with this guiding principle.
Guiding Principle: Ensure a variety of open space sizes and uses.	**No Conflict.** The Proposed Project would include the development of six separate open space areas of varying sizes and uses within the Main Campus: (1) Student Union Landscaping, (2) Art Complex Building Site – Welcome Lawn, (3) Amphitheater, (4) Science Quad, (5) The Tri, and (6) New Quad. Therefore, the Proposed Project would be consistent with this guiding principle.
Guiding Principle: Create a hierarchy of open space and pathways.	**No Conflict.** The proposed Student Union Landscaping will serve as a pedestrian connection between the Science Quad and the Main Quad open spaces. The design of the Student Union Landscape will also create suitable connections with the adjacent amphitheater. An event plaza will bridge the Main Quad and the future Amphitheater, adding energy and capacity to the already-vibrant heart of campus. The Art Complex Building Site – Welcome Lawn outdoor space will serve the adjacent Student Services Center and it is also a campus gateway for anyone parking in Lot 1 to access the core of campus. The New Quad will serve as a gateway for those parking in Structures 3 and 4 as well as those using the swimming pool. Therefore, the Proposed Project would be consistent with this guiding principle.

Guiding Principle: Promote connectivity with clear and distinct linkages.	**No Conflict.** In addition to the open space pathways discussed above, pedestrian circulation will be maintained and improved with implementation of the Proposed Project. The main pedestrian promenade at SMC begins at the primary drop-off circle along Pico Boulevard and terminates adjacent to the Library and Media Center on Pearl Street. While pedestrian movement is mostly oriented north-south through the Main Campus, there are opportunities to better define secondary east-west routes. The 2024 Master Plan Update provides that the 16th Street connection to campus should be improved to provide a clear and distinct access route to campus for both maintenance and operations staff, as well as other SMC staff, students, and visitors. Additionally, a secondary north-south pedestrian route paralleling the existing primary route should move users from Drescher Hall on the north to Pearl Street on the south. Therefore, the Proposed Project would be consistent with this guiding principle.
Guiding Principle: Use open space and landscape as organizing elements.	**No Conflict.** The proposed open space areas would be organized in six distinct areas within the Main Campus. The open space and landscaping design would be well branded and welcoming, and would be complementary to the remainder of the Main Campus. Therefore, the Proposed Project would be consistent with this guiding principle.
Source: Santa Monica College Career and Educational Facilities Master Plan 2010 Update, April 2010.	

2. Mitigation Measures

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.

3. Level of Significance After Mitigation

As described in AES-MM-1, above, visual blight associated with temporary and intermittent construction activities during the buildout of the Proposed Project would be effectively screened from public view. As such, temporary aesthetic impacts during construction would be reduced to less than significant levels after mitigation.

The Proposed Project's operational aesthetic impacts with respect to consistency with local plans and regulations would be less than significant prior to mitigation.

Threshold d) Would the Project create a new source of substantial light or glare which would adversely affect night or daytime views, respectively, in the area?

1. Impact Analysis

1) Construction

Construction activities would occur in accordance with the provisions of SMMC Section 4.12.110(a)(1), which limits the hours of construction to between 8:00 a.m. and 6:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays and national holidays, with no construction permitted on Sundays. Therefore, construction 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. Construction light impacts would be less than significant.

2) Operation

i) Light and Glare

Implementation of the Proposed Project would incorporate architectural and pedestrian-scale lighting features that are comparable with the existing uses on the Project Site. The Project Site would continue to include low-level exterior lights adjacent to buildings along pathways for security and wayfinding purposes. In addition, low-level lighting for accent signage, architectural features, and landscape elements would also be incorporated throughout the site. 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. Ground-level pedestrian lighting and landscape lighting would also be comparable to existing lighting on campus. In addition, the proposed additional trees and landscaped vegetation would further reduce light trespass. All outdoor lighting would be in accordance with SMMC Section 9.21.080. As such, lighting fixtures would be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. Code-required lighting for passageways and recesses would be provided in sufficient levels for public safety.

The Proposed Project would include additional signage on the Project Site which would increase productivity and efficiency, improve the quality and safety of the SMC Campus, enhance visibility of facilities, and provide brand reinforcement. Signage would be located along the Pico Boulevard frontage, which would provide for improved wayfinding and improve the visitor experience. An improved Bus Arrival Plaza with campus branding and a digital marquee will complement the Student Services Center gateway and create a seamless arrival sequence for those arriving by transit. The larger entrance plaza will allow room for pedestrians to wait for the bus. The plaza on the Pico Boulevard side of the Drescher Replacement will provide visual interest with public art and a photo opportunity for campus events. No signage that is substantially different from that on

the existing Project Site is proposed. The digital marquee lighting would be consistent with SMMC Section 9.21.080 and would not be substantially different from the existing urban nighttime lighting in the Project Site vicinity. Impacts related to light would therefore be less than significant.

While the architectural materials and design elements for new buildings have not yet been developed, the new structures would be designed in a manner that is consistent with the architectural materials incorporated into the existing buildings on the Campus. The Master Plan would not cause excessive glare that is out of character with the land uses surrounding the SMC Campus or result in a substantial increase in light or glare that would affect surrounding land uses. Glare impacts would therefore be less than significant.

i) Shade/Shadow

This impact analysis evaluates the potential for the Proposed Project to cast new shadow that would adversely impact the surrounding area by producing new shadow on shadow-sensitive uses for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October). Areas sensitive to shadow/shading include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (i.e., schools, convalescent homes, cemetery); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Sensitive receptors in the vicinity of the Project Site are generally limited to outdoor spaces associated with residential and institutional land uses.

As shown in Figures IV.A-6 through IV.A-12, the Proposed Project's extreme winter shadows would be confined to the boundaries of the existing campus and adjacent streets between 9:00 a.m. and 3:00 p.m. with the exception of the shadows cast by the Pico 1 and 2 Replacement Buildings. During winter months these two structures would cast shadows to the north at 9:00 a.m., extending to the single-family residential neighborhood located north of Pico Boulevard, east of 17th Street. These shadows would gradually move in a southwardly direction and would not shade any residential land uses by 12:00 p.m. Thus, winter shadow impacts would be less than significant.

The Proposed Project's summer shadow impacts are illustrated in Figures IV.A-13 through IV.A-21. As shown in these renderings, no adjacent land uses would be impacted by Proposed Project shadows until after 5:00 p.m. Thus, summer shadow impacts would be less than significant.

1. Mitigation Measures

No mitigation measures are required.

2. Level of Significance After Mitigation

As no impacts to related to light and glare would occur no mitigation measures are required.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-6
Winter Solstice Shadows
9:00 A.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-7
Winter Solstice Shadows
10:00 A.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-8
Winter Solstice Shadows
11:00 A.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-9
Winter Solstice Shadows
12:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-10
Winter Solstice Shadows
1:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-11
Winter Solstice Shadows
2:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-12
Winter Solstice Shadows
3:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-13
Summer Solstice Shadows
9:00 A.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-14
Summer Solstice Shadows
10:00 A.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-15
Summer Solstice Shadows
11:00 A.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-16
Summer Solstice Shadows
12:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-17
Summer Solstice Shadows
1:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-18
Summer Solstice Shadows
2:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-19
Summer Solstice Shadows
3:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-20
Summer Solstice Shadows
4:00 P.M.



Source: Google Earth, Aerial View, 2023.

Figure IV.A-21
Summer Solstice Shadows
5:00 P.M.

F. Cumulative Impacts

1. Impact Analysis

a) Cumulative Scenic Quality Impacts

Development of the Proposed Project in combination with the 26 related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the Santa Monica area. The development of the related projects is expected to occur in accordance with adopted plans and regulations. Development of the related projects would be required to conform to the any applicable design guidelines or ordinances that guide development that applies to each related project site, such as the City of Santa Monica General Plan and Santa Monica Municipal Code. With respect to the overall visual quality of the surrounding neighborhood, each of the related projects would be subject to the Santa Monica Planning Department for review and approval to ensure that the buildout of the community is consistent with the underlying zoning codes and General Plan land use policies that are in place to preserve the neighborhood's aesthetics and character. The applicable reviews would ensure that each related project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. As such, the Proposed Project would not result in a cumulatively considerable impact on the visual character or visual quality of the Project area, and cumulative impacts would be considered less than significant.

b) Cumulative Light and Glare Impacts

With respect to light and glare impacts, the Proposed Project, in combination with the related projects, would increase nighttime lighting and daytime glare in the area. Nighttime lighting impacts during construction would be limited to low-level security lighting for site security and safety purposes. As such, cumulative lighting impacts during construction activities would be less than significant. With respect to operational impacts, each related project would be expected to comply with Code-required lighting measures that would reduce light and glare impacts. As such, the Proposed Project would not make a cumulatively considerable contribution to light or glare, and cumulative impacts would be considered less than significant.

c) Cumulative Shade and Shadow Impacts

Impacts related to shade and shadow are typically site-specific and are assessed on a site-by-site basis. As such, it should be noted that each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address shade and shadow impacts, if applicable. The analysis of the Proposed Project's shade and shadow impacts concluded that the Proposed Project would have no significant shade and shadow impacts to the surrounding land uses. For purposes of assessing cumulative shade and shadow impacts, cumulative impacts would similarly be limited to the areas adjacent to and within the immediate viewshed of each related project site. Therefore, the Proposed Project's incremental contribution

to a cumulative shade and shadow impact would not be considerable, and cumulative impacts would be less than significant.

2. Mitigation Measures

Cumulative impacts related to aesthetics including visual character, light and glare, and shade and shadow impacts would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Cumulative impacts related to aesthetics including visual character, light and glare, and shade and shadow would be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level would remain less than significant.

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IV.B AIR QUALITY

A. Introduction

This section evaluates the Proposed Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Proposed Project and evaluates whether Proposed Project emissions would (1) conflict with or obstruct implementation of the applicable air quality plan; (2) result in a cumulatively considerable net increase of any criteria pollutant for which the Proposed Project region is in non-attainment under an applicable federal or state ambient air quality standard; (3) expose sensitive receptors to substantial pollutant concentrations; or (4) result in other emissions, such as those leading to odors, affecting a substantial number of people. This section relies on information included in the Air Quality Modeling and Greenhouse Gas Emissions Worksheets, provided in Appendix C of this Draft EIR.

B. Environmental Setting

1. Air Quality Background

a) Air Quality and Public Health

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of an overall endeavor to prevent further deterioration and to facilitate improvement in air quality. The National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been set at levels considered safe to protect public health, including the health of sensitive populations, such as asthmatics, children, and the elderly with a margin of safety, and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.[1] As the scientific methods for the study of air pollution health effects have progressed over the past decades, adverse effects have been shown to occur at lower levels of exposure. For some pollutants, no clear thresholds for effects have been demonstrated. New findings over time have, in turn, led to the revision and lowering of NAAQS which, in the judgment of the U.S. Environmental Protection Agency (U.S. EPA), are necessary to protect public health. Ongoing assessments of the scientific evidence from health studies continue to be an important part of setting and informing revisions to the NAAQS.[2]

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1 U.S. EPA, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table, accessed January 2025.

2 SCAQMD, Final 2022 AQMP, 2022, Appendix I, Health Effects, p. I-154.

At the regional level, the South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino Counties, including the Coachella Valley.[3] The City of Santa Monica (City) is located within the South Coast Air Basin (Air Basin), which is a distinct geographic subarea within the SCAQMD's jurisdiction. The SCAQMD, together with the Southern California Association of Governments (SCAG), has the responsibility for ensuring that national and state ambient air quality standards are achieved and maintained for the Air Basin. Failure to comply with these standards puts state and local agencies at risk for penalties in the form of lawsuits, fines, a federal takeover of state implementation plans, and a loss of funds from federal agencies, such as the Federal Highway Administration and Federal Transit Administration.

To meet the air quality standards, regional plans are developed, including the SCAQMD Air Quality Management Plan (AQMP), which incorporates regional demographic projections and integrated regional land use and transportation strategies from the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These plans work together to examine multiple pollutants, cumulative effects, and transport issues related to attaining healthful air quality in the region. In addition, a host of regulatory standards at the federal, state, regional, and local level function to identify and limit exposure of air pollutants and toxic air contaminants (TACs).

b) Local Air Quality and Air Pollution Sources

As mentioned above, the City of Santa Monica is located within the South Coast Air Basin, which is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to the Coachella Valley area in Riverside County. The regional climate within the Air Basin is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Air Basin is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry.

The Air Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific High. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations

[3] SCAQMD, Map of Jurisdiction, 1999.

are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

Air pollutant emissions within the Air Basin are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

c) Air Pollutant Types

1) Criteria Pollutants

The six principal pollutants for which national and state criteria and standards have been promulgated and which are most relevant to current air quality planning and regulation in the Air Basin include ozone (O_3), respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, respectively), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are referred to as “criteria air pollutants” as a result of the specific standards, or criteria, which have been adopted for them.

i) Ozone (O_3)

O_3 is a gas that is formed when volatile organic compounds (VOCs) and NO_X - both byproducts of internal combustion engine exhaust - undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are prevalent. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

ii) Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when

gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Respirable and fine particulate matter, PM_{10} and $PM_{2.5}$, consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, such as pollen and windstorms, are naturally occurring. However, in urban areas, such as the City, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. The human body naturally prevents the entry of larger particles into the body. However, small particles can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

iii) Carbon Monoxide (CO)

CO is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. In urban areas, such as the City, automobile exhaust accounts for the majority of CO emissions. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O_3, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

iv) Nitrogen Dioxide (NO_2)

Nitrogen dioxide is a nitrogen oxide (NO_X) compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic areas, particularly in urban areas, such as the City, may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. NO_X irritates the nose and throat and increases one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of O_3.

v) Sulfur Dioxide (SO_2)

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the predominant form found in the lower atmosphere and is a product of burning sulfur or materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. Emissions of SO_2 aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants lead to higher rates of respiratory illness.

vi) Lead (Pb)

Pb is a metal found naturally in the environment, as well as in manufactured products. The highest levels of Pb in the air are usually found near Pb smelters. The major sources of Pb emissions in the air are ore and metals processing and piston-engine aircraft operating on leaded aviation gasoline. Pb is also emitted from the sanding or removal of old lead-based paint (LBP). Pb emissions are primarily a regional pollutant. Pb affects the brain and other parts of the body's nervous system. Exposure to Pb in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

2) Additional Criteria Pollutants (California Only)

In addition to the national standards, the State of California regulates state-identified criteria pollutants, including sulfates (SO_4^{2-}), hydrogen sulfide (H_2S), visibility-reducing particles, and vinyl chloride. With respect to the state-identified criteria pollutants, most land use development projects either do not emit them (i.e., H_2S [nuisance odor] and vinyl chloride), or otherwise account for these pollutants (i.e., SO_4^2 and visibility reducing particles) through other criteria pollutants. For example, SO_4^{2-} are associated with SO_X emissions, and visibility-reducing particles are associated with particulate matter emissions. A description of the health effects of the state-identified criteria air pollutants is provided below.

i) Sulfates (SO_4^{2-})

SO_4^{2-} are the fully oxidized ionic form of sulfur. SO_4^{2-} occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to SO_4^{2-} in the atmosphere. Effects of SO_4^{2-}exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. SO_4^{2-} are particularly effective in degrading visibility and, due to the fact that they are usually acidic, can

harm ecosystems, and damage materials and property.

ii) Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing and natural emissions from geothermal fields. Industrial sources of H_2S include petrochemical plants and kraft paper mills. H_2S is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills.[4] Exposure to H_2S can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting; additional health effects of eye irritation have only been reported with exposures greater than 50 parts per million (ppm), which is considerably higher than the odor threshold.[5] H_2S is regulated as a nuisance based on its odor detection level; if the standard were based on adverse health effects, it would be set at a much higher level.[6]

iii) Visibility-Reducing Particles

Visibility-reducing particles come from a variety of natural and manmade sources and can vary greatly in shape, size and chemical composition. Visibility reduction is caused by the absorption and scattering of light by the particles in the atmosphere before it reaches the observer. Certain visibility-reducing particles are directly emitted to the air, such as windblown dust and soot, while others are formed in the atmosphere through chemical transformations of gaseous pollutants (e.g., SO_4^2, nitrates, organic carbon particles), which are the major constituents of particulate matter. As the number of visibility-reducing particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range.[7] Exposure to some haze-causing pollutants have been linked to adverse health impacts similar to PM_{10} and $PM_{2.5}$, as discussed above.[8]

iv) Vinyl Chloride

Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products and is generally emitted from industrial processes. Other major sources of vinyl chloride have been detected near landfills, sewage

4 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed January 2025.

5 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed January 2025.

6 CARB, Hydrogen Sulfide & Health, https://ww2.arb.ca.gov/resources/hydrogen-sulfide-and-health, accessed January 2025.

7 CARB, Visibility-Reducing Particles and Health, https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed January 2025.

8 CARB, Visibility-Reducing Particles and Health, https://ww2.arb.ca.gov/resources/visibility-reducing-particles-and-health, accessed January 2025.

plants, and hazardous waste sites due to microbial breakdown of chlorinated solvents.[9] Short-term health effects of exposure to high levels of vinyl chloride in the air include central nervous system effects, such as dizziness, drowsiness, and headaches while long-term exposure to vinyl chloride through inhalation and oral exposure causes liver damage and has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans.[10] Most health data on vinyl chloride relate to carcinogenicity; thus, the people most at risk are those who have long-term exposure to elevated levels, which is more likely to occur in occupational or industrial settings. However, control methodologies applied to industrial facilities generally prevent emissions to the ambient air.[11]

3) Volatile Organic Compounds (VOCs) and Toxic Air Contaminants (TACs)

Although the SCAQMD's primary mandate is attaining the NAAQS and the CAAQS for criteria pollutants within the district, SCAQMD also has a general responsibility to control emissions of air contaminants and prevent endangerment to public health. As a result, the SCAQMD has regulated pollutants other than criteria pollutants, such as VOCs, TACs, greenhouse gases (GHGs), and stratospheric O_3-depleting compounds.

i) VOCs

VOCs are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, VOCs are a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are, therefore, regulated as "precursors" to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products.

ii) TACs

TACs is a term used to describe airborne pollutants that may be expected to result in an increase in mortality or serious illness or which may pose a present or potential hazard to human health, and include both carcinogens and non-carcinogens. The California Air Resources Board (CARB) and the California Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. CARB has listed approximately 200 toxic substances, including those identified by the U.S. EPA, which are identified on the California Air Toxics Program's TAC List. TACs are also not classified as "criteria"

9 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 2025.

10 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 2025.

11 CARB, Vinyl Chloride & Health, https://ww2.arb.ca.gov/resources/vinyl-chloride-and-health, accessed January 2025.

air pollutants. The greatest potential for TAC emissions during construction is related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment. During long-term operations, sources of DPM may include heavy duty diesel-fueled delivery trucks and stationary emergency generators. The effects of TACs can be diverse and their health impacts tend to be local rather than regional; consequently, ambient air quality standards for these pollutants have not been established, and analysis of health effects is instead based on cancer risk and exposure levels.

2. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding air quality at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act
  - National Ambient Air Quality Standards
- California Clean Air Act
  - California Ambient Air Quality Standards
- California Code of Regulations
- State Programs for Toxic Air Contaminants
- Diesel Risk Reduction Program
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- South Coast Air Quality Management District
  - Air Quality Management Plan
  - Air Quality Guidance Documents
  - Rules and Regulations

a) Federal

1) Federal Clean Air Act

The federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the latest amendments occurring in 1990.[12] The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.[13] The U.S. EPA is responsible for the implementation and enforcement of the CAA, which establishes the NAAQS, specifies future dates for achieving compliance, and requires the U.S. EPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control

[12] 42 United States Code §7401 et seq., 1970.

[13] U.S. EPA, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed January 2025.

measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).[14]

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. Table IV.B-1, Ambient Air Quality Standards, shows the NAAQS currently in effect for each criteria pollutant and their corresponding attainment status. The Air Basin fails to meet national standards for O_3 and $PM_{2.5}$ and, therefore, is considered a federal "non-attainment" area for these pollutants.

In addition, Los Angeles County fails to meet the national standard for Pb and, therefore, is considered a federal non-attainment area for Pb.

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the U.S. EPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially, and the specification requirements for cleaner burning gasoline are more stringent.

The NAAQS and the CAAQS for the California criteria air pollutants (discussed below) have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

b) State

1) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practicable date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both state and federal air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. Table IV.B-1 includes the CAAQS currently in effect for each of the criteria pollutants, as well as other pollutants recognized by the state. As shown in Table IV.B-1, the CAAQS include more stringent standards than the NAAQS. The Air Basin fails to meet state standards for O_3, PM_{10}, and $PM_{2.5}$ and, therefore, is

[14] U.S. EPA, Clean Air Act Overview, Clean Air Act Table of Contents by Title, last updated May 3, 2023, www.epa.gov/clean-air-act-overview/clean-air-act-text, accessed January 2025. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

considered a state "non-attainment" area for these pollutants.

2) California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards.

Table IV.B-1
Ambient Air Quality Standards

Pollutant	Averaging Period	Federal Standard [a,b]	California Standard [a,b]	South Coast Air Basin Attainment Status [c]	
				Federal Standard	California Standard
Ozone (O_3)	1-hour	—	0.09 ppm (180 µg/m^3)	—	Non-Attainment
	8-hour	0.070 ppm (137 µg/m^3)	0.07 ppm (137 µg/m^3)	Non-Attainment (Extreme)	Non-Attainment
Respirable Particulate Matter (PM_{10})	24-hour	150 µg/m^3	50 µg/m^3	Attainment	Non-Attainment
	Annual	—	20 µg/m^3		
Fine Particulate Matter ($PM_{2.5}$)	24-hour	35 µg/m^3	—	Non-Attainment (Serious)	Non-Attainment
	Annual	9 µg/m^3	12 µg/m^3		
Carbon Monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	20 ppm (23 mg/m^3)	Attainment	Attainment
	8-hour	9 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)		
Nitrogen Dioxide (NO_2)	1-hour	0.10 ppm (188 µg/m^3)	0.18 ppm (339 µg/m^3)	Unclassified/ Attainment	Attainment
	Annual	0.053 ppm (100 µg/m^3)	0.030 ppm (57 µg/m^3)		
Sulfur Dioxide (SO_2)	1-hour	0.075 ppm (196 µg/m^3)	0.25 ppm (655 µg/m^3)	Unclassified/ Attainment	Attainment
	3-hour	0.5 ppm (1,300 µg/m^3)	—		
	24-hour	0.14 ppm	0.04 ppm		

		(365 µg/m^3)	(105 µg/m^3)		
	Annual	0.03 ppm (80 µg/m^3)	—		
Lead (Pb)	30-day average	—	1.5 µg/m^3	Partial Non-Attainment [d]	Attainment
	Rolling 3-month average	0.15 µg/m^3	—		
Sulfates	24-hour	—	25 µg/m^3	—	Attainment
Hydrogen Sulfide (H2S)	1-hour	—	0.03 ppm (42 µg/m^3)	—	Unclassified

Notes:
ppm = parts per million by volume
µg/m3 = micrograms per cubic meter

[a] *An ambient air quality standard is a concentration level expressed in either ppm or µg/m^{3}and averaged over a specific time period (e.g., 1 hour). The different averaging times and concentrations are meant to protect against different exposure effects. Some ambient air quality standards are expressed as a concentration that is not to be exceeded. Others are expressed as a concentration that is not to be equaled or exceeded.*

[b] *Ambient Air Quality Standards based on the 2022 AQMP.*

[c] *"Attainment" means that the regulatory agency has determined based on established criteria, that the Air Basin meets the identified standard. "Non-attainment" means that the regulatory agency has determined that the Air Basin does not meet the standard. "Unclassified" means there is insufficient data to designate an area, or designations have yet to be made.*

[d] *The Los Angeles County portion of the Air Basin is designated as a nonattainment area for the federal lead standard based on source-specific monitoring at two locations as determined by the U.S. EPA using 2007-2009 data. However, all stations in the Air Basin, including the near-source monitoring in Los Angeles County, have remained below the lead NAAQS for the 2012 through 2020 period. An attainment re-designation request is pending.*

Sources: United States Environmental Protection Agency, NAAQS Table, https://www.epa.gov/criteria-air-pollutants/naaqs-table, accessed February 2025; and CARB, Ambient Air Quality Standards July, 7, 2024, https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf, accessed February 2025.

3) State Programs for Toxic Air Contaminants

The California Air Toxics Program is an established two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air. In the risk identification step, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of Airborne Toxic Control Measures (ATCMs), both for stationary and mobile sources, including On-Road and Off-Road Vehicle Rules. These ATCMs include measures, such as limits on heavy-duty diesel motor vehicle idling and emission standards for off-road diesel construction equipment, in order to reduce public exposure to DPM and other TACs. These actions are also supplemented by the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" program and Senate Bill (SB) 1731, which require facilities to report their air toxics emissions, assess health risks, notify nearby residents and workers of significant risks if present, and reduce their risk through implementation of a risk management

plan. SCAQMD has further adopted two rules to limit cancer and non-cancer health risks from facilities located within its jurisdiction. Rule 1401 (New Source Review of Toxic Air Contaminants) regulates new or modified facilities, and Rule 1402 (Control of Toxic Air Contaminants from Existing Sources) regulates facilities that are already operating. Rule 1402 incorporates requirements of the AB 2588 program, including implementation of risk reduction plans for significant risk facilities.

4) Diesel Risk Reduction Program

CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines* and the *Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

c) Regional

The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

1) Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2022 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O_3 and $PM_{2.5}$ are met and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_X emissions[15] sufficiently to meet the O_3 standard deadlines as NO_X plays a critical role in the creation of O_3. Since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$

[15] NO_x emissions are a precursor to the formation of both O_3 and secondary $PM_{2.5}$.

levels and attainment of $PM_{2.5}$ standards.[16] The 2022 AQMP is focused on attaining the 2015 8-hour O_3 standard of 70 parts per billion. The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated development of available clean technologies, incentives and other CAA measures to achieve this standard.[17]

The SCAQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emission reductions across federal, state, and local levels and industries. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and ocean-going vessels. These strategies are to be implemented in partnership with CARB and U.S. EPA.

The AQMP also incorporates the transportation strategy and transportation control measures from the SCAG 2020-2045 RTP/SCS Plan.[18] SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG.[19] The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2020 AQMP, are based on the 2020-2045 RTP/SCS.

Currently, the most recent RTP/SCS was updated and approved by SCAG's Regional Council in April 2024 (2024-2050 RTP/SCS). However, CARB has not yet approved the 2024-2050 RTP/SCS; therefore, this analysis relies on the 2020-2045 RTP/SCS. Nevertheless, a consistency analysis with the 2024-2050 RTP/SCS is provided for informational purposes to show that the Proposed Project would also not conflict with its goals and policies.

The 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's 2020-2045 RTP/SCS. The region is projected to see a 12-percent growth in population, a 17-percent growth in housing units, an 11-percent growth in employment, and a 5-percent growth in VMT

[16] Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2022 AQMP for detailed discussion).

[17] SCAQMD, *Final 2022* AQMP, December 2022, page ES-2.

[18] SCAG, Final 2020-2045 RTP/SCS, September 3, 2020.

[19] SCAQMD, Final 2022 AQMP, December 2022, page ES-2.

between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state, and federal levels.[20]

2) SCAQMD Air Quality Guidance Documents

The SCAQMD published the *CEQA Air Quality Handbook* (approved by the SCAQMD Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.[21] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website to be used in conjunction with the Handbook.[22]

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.[23] SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. The SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.[24] The SCAQMD adopted additional guidance regarding $PM_{2.5}$ emissions in a document called *Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*.[25] The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

20 SCAQMD, Final 2022 AQMP, December 2022, Figure 1-4.

21 SCAQMD, CEQA Air Quality Handbook, April 1993.

22 SCAQMD, Air Quality Analysis Handbook, 1993, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993), accessed January 2025.

23 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

24 SCAQMD, Final Localized Significance Threshold Methodology, June 2003 (revised July 2008).

25 SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

3) SCAQMD Rules and Regulations

The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for land use development projects, which include, but are not limited to, the following:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules that apply to the Proposed Project:

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Best available control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the U.S. EPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules that may apply to the Proposed Project:

- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Regulation XIII – New Source Review (NSR): Regulation XIII sets requirements for preconstruction review required under both federal and state statutes for new and modified sources located in areas that do not meet the CAA standards ("non-attainment" areas). NSR

applies to both individual permits and entire facilities. Any permit that has a net increase in emissions is required to apply Best Available Control Technology (BACT). Facilities with a net increase in emissions are required to offset the emission increase by use of Emission Reduction Credits (ERCs). The regulation provides for the application, eligibility, registration, use and transfer of ERCs. For low emitting facilities, the SCAQMD maintains an internal bank that can be used to provide the required offsets. In addition, certain facilities are subject to provisions that require public notice and modeling analysis to determine the downwind impact prior to permit issuance.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units, which emit TACs or other non-criteria pollutants. The following is a rule that may apply to the Proposed Project:

- **Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities:** This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

d) Local

1) Santa Monica College

In 2018, and again in 2020, SMC's President/Superintendent, Dr. Kathryn Jeffery, re-affirmed SMC's commitment to doing all that can be done to work towards the goals of the Paris Climate Agreement. SMC joined 1,500+ cities, businesses, universities, investors, and other organizations calling to: "Drive economic growth across every sector of the economy through job-creating sustainable investments; expand U.S. leadership at home and abroad; and reimagine community partnership to advance just and equitable climate solutions and build resilience to climate change."

In January 2020, SMC's Board of Trustees adopted the following Climate Change and Sustainability Policy Goals:

Goal	2025	2030
Reduction of greenhouse gas emissions to below 1990 levels	30%	40%
Increase of renewable energy consumption	25%	50%
Of fleet vehicles are zero-emission vehicles	25%	50%
Of all new buildings and major renovations will be constructed as Zero Net Energy	50%	100%
Of all new buildings and major renovations will achieve at least a Leadership in Energy and Environmental Design (LEED) "Silver" or equivalent rating	50%	100%
Increase in the procurement of sustainable products and services compared to current levels	20%	25%
Reduction of municipal solid waste compared to current levels	25%	50%
Source: Santa Monica College, SMC Community, Sustainability, Policies and Programs, https://www.smc.edu/community/sustainability/policies-programs.php, accessed January 2025.		

Although these goals focus on sustainability and climate change, they would also reduce overall air emissions.

3. Existing Conditions

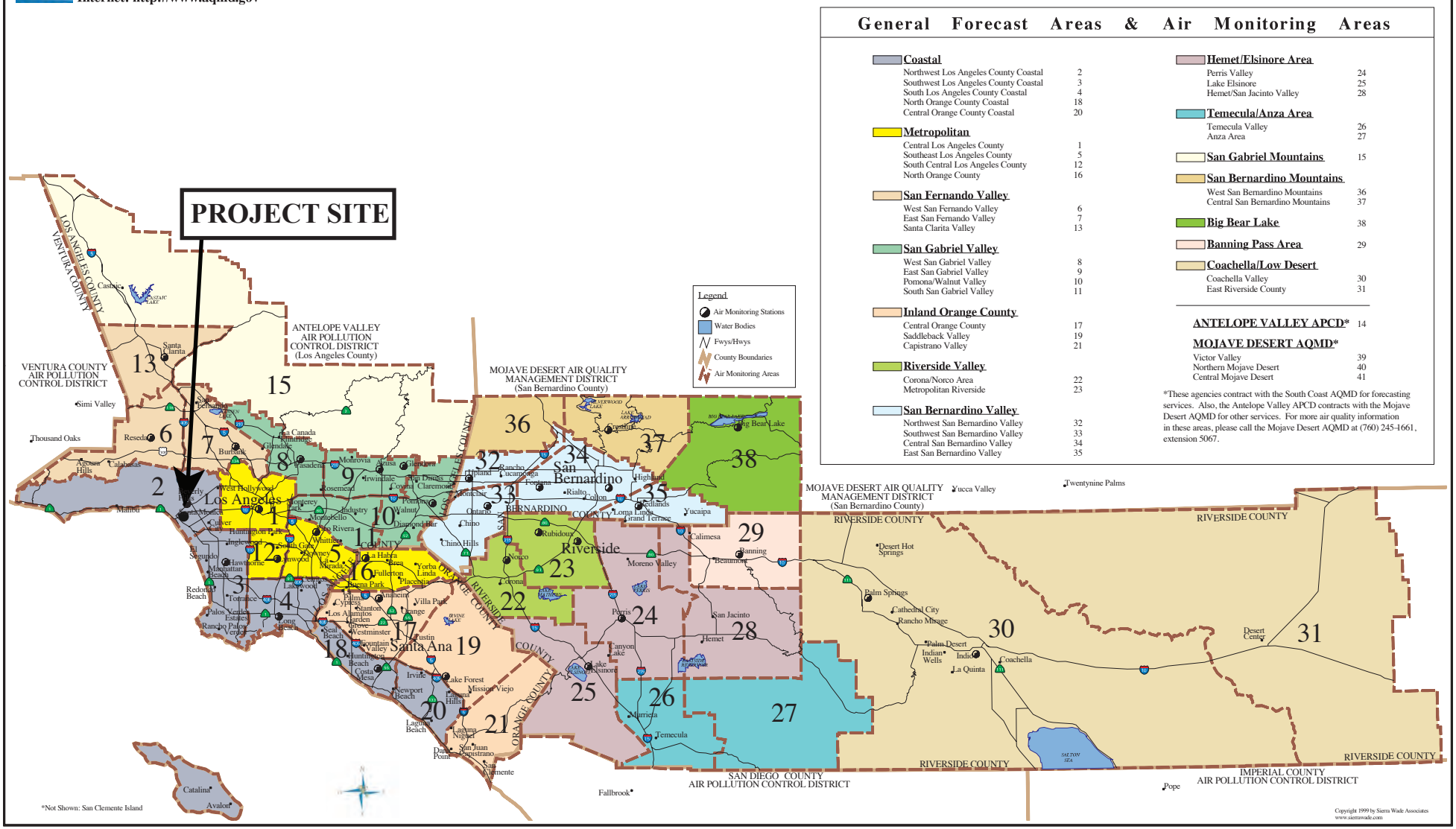
a) Regional Air Quality

The Project Site is located within the South Coast Air Basin (Air Basin). As shown in Figure IV.B-1, SCAQMD Air Basin and Source Receptor Areas, the Air Basin is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The Air Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside counties, in addition to the Coachella Valley area in Riverside County. Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Air Basin has low mixing heights and light winds, which help to accumulate air pollutants.

As detailed in the AQMP, the major sources of air pollution in the Air Basin are divided into four source classifications: point, area, on-road, and off-road sources. Point and area sources are the two major subcategories of stationary sources. Point sources include permitted facilities that contain one or more emission sources at an identified location, such as power plants, refineries and factories that generate emissions. Area sources consist of many small emission sources such as residential water heaters, consumer products, and mobile sources, which are widely distributed across the region. On-road sources and off-road sources are the two main subcategories of mobile sources, such as cars and trucks (on-road sources) and heavy construction equipment (off-road sources).

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

21865 Copley Drive, Diamond Bar, CA 91765-4182
Information: 1-800-CUT-SMOG (1-800-288-7664)
Internet: http://www.aqmd.gov



Source: South Coast Air Quality Management District, 1999.

Figure IV.B-1
SCAQMD Air Basin and Source Receptor Areas

1) Criteria Pollutants

Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and CARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and state standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in "attainment." If the pollutant exceeds the standard, the area is classified as a "non-attainment" area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified." The U.S. EPA and the CARB use different standards for determining whether the Air Basin is in attainment. The attainment status for the Los Angeles County portion of the Air Basin with regard to the NAAQS and CAAQS is shown in Table IV.B-1, above. As shown in Table IV.B-1, the Air Basin is designated as a state and federal non-attainment area for O_3 and $PM_{2.5}$, and as a non-attainment area for PM_{10} under the state standard. In addition, the Air Basin is designated as a federal non-attainment area for lead in the Los Angeles County portion of the Air Basin.[26]

2) Toxic Air Contaminants

In addition to criteria pollutants, the SCAQMD periodically assesses levels of toxic air contaminants (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655 as follows:

"'Toxic air contaminant' means an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant."

The SCAQMD released the fourth round of its Basin-wide Multiple Air Toxics Exposure Study (MATES V – Final Report) in August 2021.[27] MATES V estimated the cancer risk from TAC emissions throughout the Air Basin by conducting a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize health risks in the Air Basin. MATES V focused on carcinogenic risk from TACs and did not estimate other health effects from particulate exposures.[28]

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[26] As noted in the 2016 Final AQMP (at page 2-2) and the 2022 AQMP (at page 2-6), the Los Angeles County portion of the Air Basin is designated a non-attainment area for the federal lead standard on the basis of source-specific monitoring at two locations as determined by U.S. EPA using 2007–2009 data. However, all stations in the Air Basin, including the near-source monitoring in Los Angeles County, have remained below the lead NAAQS for the 2012 through 2020 period. The District will request that U.S. EPA re-designate the Los Angeles County portion of the Air Basin as attainment for lead.

[27] SCAQMD, Final Mates V Report, August 2021, website: http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6, accessed January 2025.

[28] Mortality and other health effects form particulate exposure were conducted as part of the 2016 and 2022 Air Quality Management Plans.

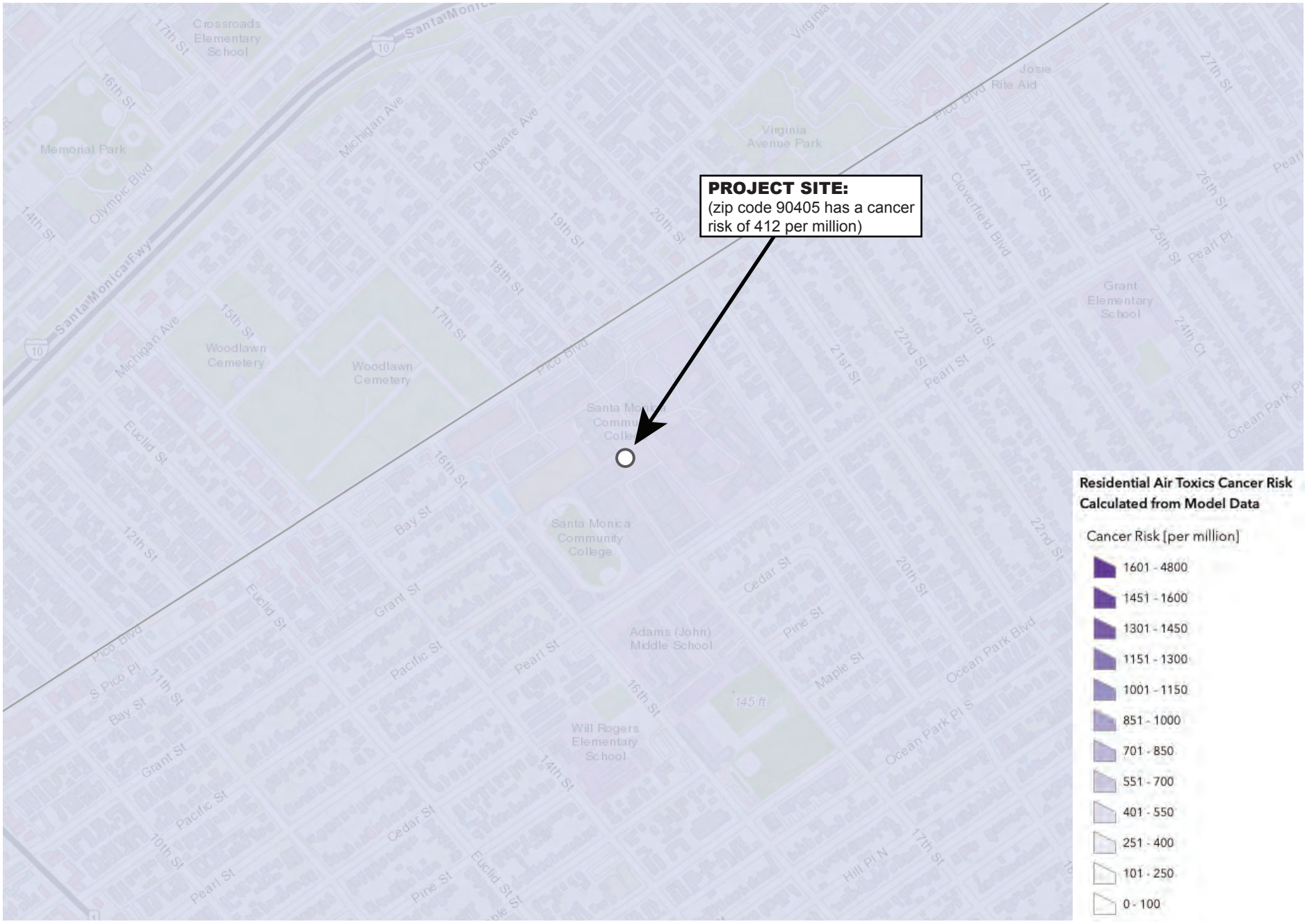
The air toxics cancer risk at the MATES V monitoring locations range from 585 to 842 per million throughout the Air Basin. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represented approximately 88 percent of the cancer risk with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations such as refineries and power plants, as well as smaller businesses such as gas stations and chrome plating facilities. Based on average measurements at ten fixed monitoring sites, the levels of air toxics continued to decline compared to previous MATES iterations. The population-weighted risk in MATES V shows a 40 percent reduction in modeled air toxics risk compared to the risks in MATES IV period (2005). Diesel-particulate matter, while also substantially reduced from past MATES studies, continues to dominate the overall cancer risk from air toxics. The reduction in diesel particulate matter emissions has resulted in significant improvement in cancer risks in the areas adjacent to the ports which was the area with the highest cancer risks in previous MATES. The results from this study support a continued focus on the reduction of toxic emissions, particularly from diesel engines.

As part of MATES V, the SCAQMD prepared a data visualization tool with an interactive map that shows estimates of cancer risks in the Air Basin from ambient levels of TACs based on the modeling effort to provide insight into relative risks. The map reports estimated cancer risks based on zip codes. The cancer risk estimates reported there should not be interpreted as actual rates of disease in the exposed population, but rather as estimates of potential risk, based on a number of conservative assumptions. In general, MATES V indicates that the highest cancer risks from TACs are found near shipping ports, goods movement sources, and near freeways and other transportation corridors.[29] The City of Santa Monica falls in an estimated air toxics cancer risk range between 401 to 550 per one million. As shown in Figure IV.B-2, MATES V Total Cancer Risk for the Project Site, below, the Project Site falls in an estimated range of 412 risks per one million.

b) Local Air Quality

The SCAQMD divides the Air Basin into 38 source receptor areas (SRAs) in which 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. As shown in Figure IV.B-1, SCAQMD Air Basin and Source Receptor Areas, the Project Site is located within SRA 2, which covers the Northwest Coastal Los Angeles County area. SCAQMD Station No. 91 and Air Quality System Station No. 060370113 collects ambient air quality data for SRA 2. However, this station does not provide any data for SO2, PM_{10}, $PM_{2.5}$, and lead. Therefore, data from SRA 1 (Central Los Angeles) was utilized to show the nearest available air quality data for the Project Site, based on the available data for the nearest monitoring site. Table IV.B-2, below, identifies the national and state ambient air quality standards for the relevant air pollutants, along

[29] MATES V focuses on the carcinogenic risk from exposure to air toxics and does not estimate mortality or other health effects from particulate exposures.



Source: SCAQMD, MATES V Cancer Risk Interactive Map, accessed June 2024.

Figure IV.B-2
MATES V Total Cancer Risk for the Project Site

Table IV.B-2
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants	Year			
	2020	2021	2022	2023
O_3				
Maximum 1-hour concentration measured	0.134 ppm	0.095 ppm	0.081 ppm	0.109 ppm
Number of days exceeding national 0.12 ppm 1-hour standard	1	0	0	0
Number of days exceeding state 0.09 ppm 1-hour standard	6	1	0	0
Maximum 8-hour concentration measured	0.092 ppm	0.082 ppm	0.070 ppm	0.066 ppm
Number of days exceeding national 0.070 ppm 8-hour standard	8	1	0	0
Number of days exceeding state 0.070 ppm 8-hour standard	8	1	0	0
CO				
Maximum 1-hour concentration measured	2.0 ppm	1.5 ppm	1.7 ppm	1.4
Maximum 8-hour concentration measured	1.2 ppm	1.0 ppm	1.5 ppm	1.2
NO_2				
Maximum 1-hour concentration measured	76.6 ppb	60.6 ppb	51.4 ppb	43.9 ppb
Annual average	10.6 ppb	10.0 ppb	11.4 ppb	9.4 ppb
Does measured annual average exceed national 53.4 ppb annual average standard?	No	No	No	No
Does measured annual average exceed state 30 ppb annual average standard?	No	No	No	No
PM_{10}				
Maximum 24-hour concentration measured	77 µg/m^3	64 µg/m^3	60 µg/m^3	57 µg/m^3
Number of days exceeding national 150 µg/m^3 24-hour standard	0	0	0	0
Number of days exceeding state 50 µg/m^3 24-hour standard	24	3	4	2
Annual Average Concentration (Annual Arithmetic Mean (AAM))	23 µg/m^3	25.5 µg/m^3	28.9 µg/m^3	24.3 µg/m^3
Does measured AAM exceed state 20 µg/m^3 AAM standard?	**Yes**	**Yes**	**Yes**	**Yes**
$PM_{2.5}$				
Maximum 24-hour concentration measured	47.3 µg/m^3	61.0 µg/m^3	20.5 µg/m^3	30.6 µg/m^3
Number of days exceeding national 35.0 µg/m^3 24-hour standard	2	12	0	0
Annual Arithmetic Mean (AAM)	12.31 µg/m^3	12.77 µg/m^3	8.81 µg/m^3	10.25 µg/m^3
Does measured AAM exceed national 12 µg/m^3 AAM standard?	**Yes**	**Yes**	No	No
Does measured AAM exceed state 12 µg/m^3 AAM standard?	**Yes**	**Yes**	No	No
SO_2				
Maximum 1-hour concentration measured	3.8 ppb	2.2 ppb	6.5 ppb	7.7 ppb

Air Pollutants	Year			
	2020	2021	2022	2023
99th Percentile Concentration (1 hour)	3.3 ppb	2.0 ppb	2.3 ppb	2.0 ppb
Pb				
Maximum monthly average concentration measured	0.013 µg/m^3	0.12 µg/m^3	0.008 µg/m^3	0.007 µg/m^3
Maximum 3-month rolling averages	0.011 µg/m^3	0.12 µg/m^3	0.007 µg/m^3	0.007 µg/m^3

Notes:
ppm = parts by volume per million molecules of air
ppb = parts per billion per billion molecules of air
µg/m^3=micrograms per cubic meter
Data for SRA 2 is not provided for SO2, PM_{10}, $PM_{2.5}$, and lead for the years 2020, 2021, 2022, and 2023 and CO for the years 2022 and 2023. Therefore, data from either SRA 1 (Central Los Angeles) were utilized based on the available data for the nearest monitoring site and worst-case ambient emissions.
Source: SCAQMD, Historical Data by Year, website: https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year, accessed January 2025.

with the ambient pollutant concentrations from 2020 to 2023, with 2023 being the latest year for available data.[30]

According to the air quality data shown in Table IV.B-2, the state one-hour ozone standard was exceeded 6 days in 2020 and one day in 2021. The national and state eight-hour ozone standards were both exceeded eight days in 2020 and one day in 2021. The federal 24-hour PM_{10} standard has not been exceeded from 2020 through 2023, while the state 24-hour PM_{10} standard was exceeded 24 days in 2020, three days in 2021, four days in 2022, and two days in 2023. In addition, the state annual average standard for PM_{10} was exceeded each year from 2020 to 2023. The national 24-hour $PM_{2.5}$ standard was exceeded two days in 2020 and 12 days in 2021. In addition, the state annual arithmetic mean for $PM_{2.5}$ was exceeded in 2020 and 2021. Furthermore, neither national nor state standards for SO2, CO, lead (Pb) or NO_2 have been exceeded from 2020 to 2023.

1) Existing Air Pollutant Sources in Local Vicinity

The area surrounding the Project Site is characterized by urban development consisting of commercial, retail, office, and residential land uses. Motor vehicles are the primary source of pollutants in the Project Site vicinity. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed "CO hotspots." Chapter 5 of the SCAQMD's *CEQA Air Quality Handbook* identifies CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. Sensitive receptors are defined by the SCAQMD as residences, schools, playgrounds, childcare centers, athletic

[30] SCAQMD, Historical Data by Year, website: https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year, accessed January 2025.

facilities, hospitals, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

As shown in Table IV.B-2, the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Carbon Monoxide levels in the Project area are substantially below the federal and state standards. The maximum CO levels during the past four years shown in Table IV.B-2 are 1.9 ppm (one-hour average) and 1.5 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average).

2) Existing Project Site Emissions

Air pollutant emissions are generated at the Project Site by stationary and area sources associated with the commercial uses, such as space and water heating, architectural coatings (maintenance), and consumer products. Mobile source emissions are also generated by employees, patrons, and delivery vehicles traveling to and from the Project Site. As shown in Table IV.B-3, below, the existing Project Site generates 110.73 pounds per day (ppd) of VOC, 69.71 ppd of NO_X, 671.62 ppd of CO, 1.38 ppd of SO_X, 114.60 ppd of PM_{10} and 30.86 ppd of $PM_{2.5}$. Motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site for all six criteria pollutants.

Table IV.B-3
Existing Conditions - Maximum Daily Operational Emissions from the Project Site

Emissions Source	Peak Emissions in Pounds Per Day					
	VOC [a]	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	70.1	54.6	559	1.25	113	29.3
Area	39.6	0.81	96.1	0.01	0.17	0.13
Energy	0.78	14.3	12.0	0.09	1.08	1.08
Stationary	0.25	0.00	4.52	0.03	0.35	0.35
Total Emissions [b]	**110.73**	**69.71**	**671.62**	**1.38**	**114.60**	**30.86**

Notes:
[a] *VOCs and ROGs are both precursors to ozone and are summed in the CalEEMod worksheets under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*
[b] *The highest daily emissions for NO_X, PM_{10} and $PM_{2.5}$ occur during the winter months. The highest daily emissions for VOC, CO and SO_2 occur in the summer months.*
Source: CalEEMod, Version 2022.1.1.29, Parker Environmental Consultants, 2025. The CalEEMod worksheets are provided in Appendix C to this Draft EIR.

c) Existing Sensitive Receptors in the Local Vicinity

For purposes of identifying air quality impacts, the CARB considers sensitive individuals to be those segments of the population most susceptible to poor air quality (i.e., children, the elderly,

and those with pre-existing serious health problems affected by air quality). With respect to sensitive receptors from regional air quality emissions, CARB considers residences, schools, day care centers, playgrounds, and medical facilities as sensitive land uses to air pollution.[31] With respect to localized emissions, SCAQMD considers a sensitive receptor to localized emissions be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours.[32] Under these definitions, the single-family and multi-family residences surrounding the Project Site and nearby middle school and motel are considered off-site sensitive receptors and would be deemed sensitive to regional and localized construction and operational emissions from the Proposed Project. The students on the SMC Main Campus would be considered on-site air quality sensitive receptors.

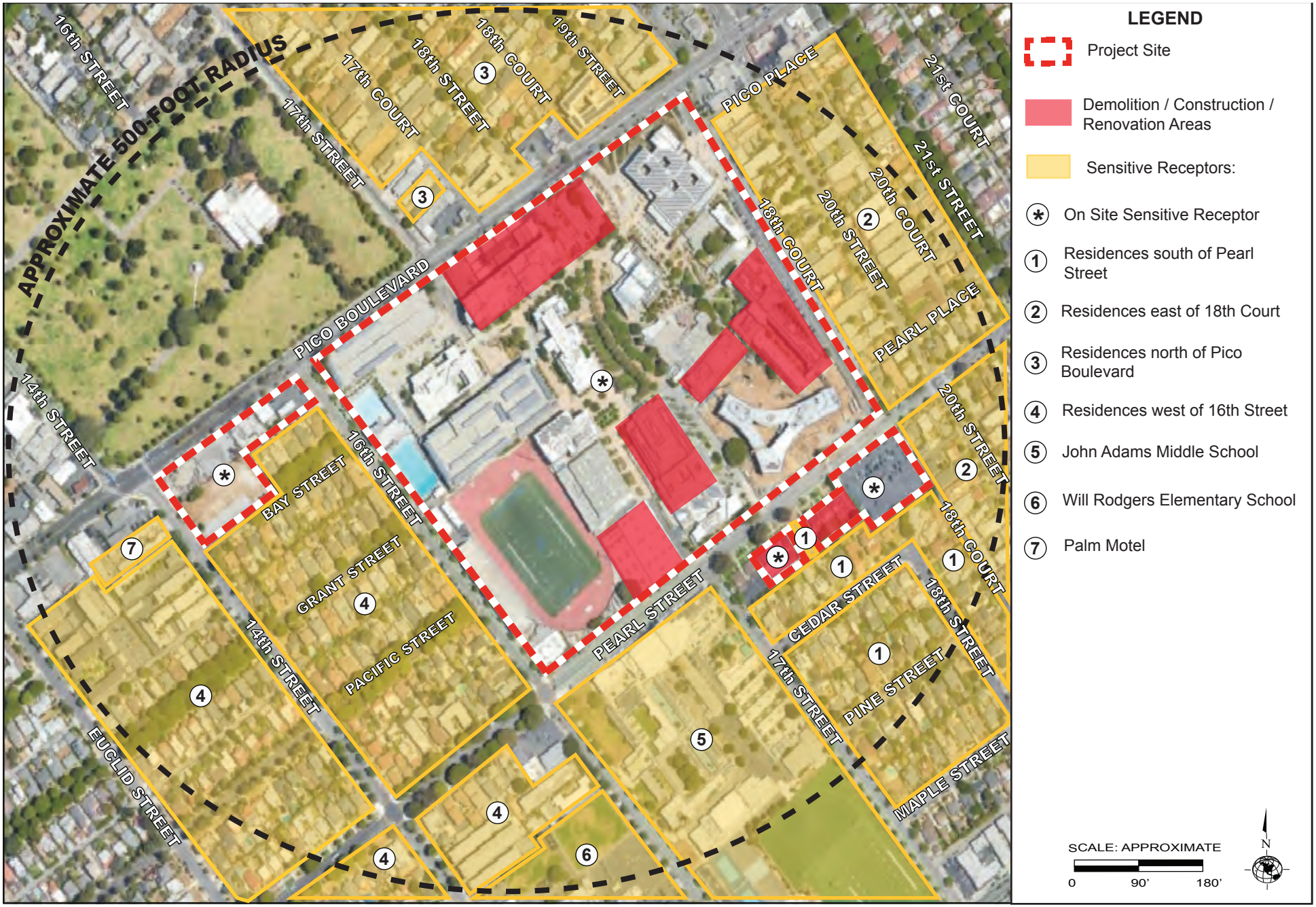
As listed in Table IV.B-4, below, seven sensitive receptor land uses were identified within an approximate 500-foot radius of the Project Site. The locations of these land uses in relation to the Project Site are depicted in Figure IV.B-3, Air Quality Sensitive Receptors.

Table IV.B-4
Air Quality Sensitive Receptors

ID	Description	Distance of Sensitive Receptor to Project Site	Type of Receptors
On-Site Sensitive Receptors			
*	SMC Main Campus (Project Site)	--	Students and faculty
Off-Site Sensitive Receptors			
1	Residences south of Pearl Street	1 foot	Single- and Multi-family Residential
2	Residences east of 18th Court	1 foot	Single- and Multi-family Residential
3	Residences north of Pico Boulevard	170 feet	Single- and Multi-family Residential
4	Residences west of 16th Street	45 feet	Single- and Multi-family Residential
5	John Adams Middle School	90 feet	School
6	Will Rodgers Elementary School	400 feet	Students and faculty
7	Palm Motel	80 feet	Motel
Source: See Figure IV.B-3, Air Quality Sensitive Receptors.			

[31] CARB, Air Quality and Land Use Handbook, 2005.

[32] SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.



Source: Google Earth, Aerial View, 2022.

Figure IV.B-3
Air Qulity Sensitive Receptors

C. Thresholds of Significance

1. State CEQA Guidelines Appendix G

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project would have a significant impact on air quality if it would:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations.

2. SCAQMD's CEQA Air Quality Handbook

To assist in answering the Appendix G Threshold questions and for purposes of this analysis, SMCCD utilizes the thresholds of significance in SCAQMD's *CEQA Air Quality Handbook*,[33] Chapter 6, as identified below, to assess the significance of the Proposed Project's estimated air quality impacts. Specifically, Table IV.B-5 shows SAQMD's currently recommended significance thresholds which provide numerical thresholds for evaluating the significance of a project's estimated air quality emissions.

a) Construction

The Proposed Project would have a significant impact with regard to construction emissions if any of the following would occur:

- Emissions from both direct and indirect sources would exceed any of the SCAQMD threshold levels identified in Table IV.B-5.
- Maximum on-site daily localized emissions exceed the Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [338.4 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [56.4 µg/m^3] averaged over an annual period).
- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hr threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

[33] SCAQMD, CEQA Air Quality Handbook, 1993.

Table IV.B-5
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NOx	100 pounds/day	55 pounds/day
VOC	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Pb [c]	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants [a]		
NO_2 1-hour average annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.534 ppm (federal)	
PM_{10} 24-hour average annual average	 10.4 µg/m^3 (construction) [b] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	 10.4 µg/m^3 (construction) [b] & 2.5 µg/m^3 (operation)	
SO_2 1-hour average 24-hour average	 0.25 ppm (state) & 0.075 ppm federal – (99th percentile) 0.04 µg/m^3 (state)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead [c] 30-day Average Rolling 3-Month Average	 1.5 µg/m^3 (state) 0.15 µg/m^3 (federal)	

Notes:
ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Ambient air quality thresholds for criteria pollutants based on SCQMD Rule 1303, Table A-2 unless otherwise stated.*

[b] *Ambient air quality threshold based on SCAQMD Rule 403.*

[c] *While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, Proposed Project construction and operation would not include sources of lead emissions and would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects such as the Proposed Project. As a result, lead emissions are not further evaluated in this Draft EIR.*

Source: SCAQMD, Air Quality Significance Thresholds, Revision March 2023, website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25, accessed January 2025.

b) Operation

The Proposed Project may have a significant impact with regard to operational emissions if any of the following would occur:

- Emissions from both direct and indirect sources would exceed any of the SCAQMD prescribed threshold levels identified in Table IV.B-5.
- Maximum on-site daily localized emissions exceed the Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).[34]
- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hr threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.
- The Proposed Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 90 ppm, respectively.
- The Proposed Project creates an odor nuisance pursuant to SCAQMD Rule 402 (i.e., objectionable odor at the nearest sensitive receptor).

c) Consistency with the Applicable General Plan and AQMP Policies

Section 15125(d) of the State CEQA Guidelines requires an analysis of project consistency with applicable general plan, specific plan, and regional plans, including but not limited to the applicable air quality attainment or maintenance plan, or State Implementation Plan. As discussed further below, this analysis evaluates consistency with the applicable regional plans and the 2022 AQMP.

d) Cumulative Impacts

The SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts.[35] Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Air

[34] SCAQMD, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds, October 2006.

[35] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution August 2003, at Appendix D-3.

Basin is in non-attainment. As such, a project may have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would cumulatively contribute to an existing or projected air quality violation.

In accordance with the SCAQMD *CEQA Air Quality Handbook*, individual construction projects that exceed SCAQMD's recommended daily thresholds of significance for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As discussed in the SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution (August 2003):

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.... Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*[36]

The cumulative analysis of air quality impacts within this Draft EIR follows SCAQMD's guidance such that construction or operational Proposed Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended daily threshold.

D. Methodology

1. SCAQMD And SCAG Policies

The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used in the preparation of this analysis. The SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. In accordance with the procedures established in the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Proposed Project's consistency with applicable SCAQMD and SCAG policies:

- Criterion 1: Would the project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reduction specified in the AQMP.
- Criterion 2: Would the project exceed the assumptions utilized in preparing the AQMP?

[36] SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.

- Is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
- Does the project include air quality mitigation measures; or
- To what extent is project development consistent with the AQMP land use policies?

In addition to the above, supplemental guidance and information to assist lead agencies is provided on the SCAQMD website (www.aqmd.gov/ceqa/hdbk.html) and includes: (1) EMFAC on-road vehicle emission factors; (2) background CO concentrations; (3) localized significance thresholds; (4) mitigation measures and control efficiencies; (5) mobile source toxics analysis; (6) off-road mobile source emission factors; (7) $PM_{2.5}$ significance thresholds and calculation methodology; and (8) updated regional thresholds of significance for construction and operational activities. The SCAQMD also recommends using approved models to calculate emissions from land use projects, such as the California Emissions Estimator Model (CalEEMod), as discussed in further detail below.

2. California Emissions Estimator Model (CalEEMod)

The construction and operational emissions from the Proposed Project's development were quantified using CalEEMod Version 2022.1.1.29. The CalEEMod program was developed in collaboration with the air districts of California as a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available.

a) Construction Emissions – Modeling Assumptions

It is anticipated that full build-out of the Proposed Project would occur over a 10-year period with construction beginning in 2025 and final build-out occurring in year 2035. The construction schedule assumes a four-year timeline for Phase 1, three years for Phase 2, and three years for Phase 3. Phasing for full build-out of the Proposed Project is subject to change depending on the scope and timing of each component/phase proposed within the limits of the Project Site. The anticipated construction phasing plan by building volume is shown in Table IV.B-6, below.

For purposes of analyzing construction emissions for each end phase, the following assumptions and modeling inputs were made. For purposes of quantifying emissions from grading quantities, the total grading area was estimated based on the all of the areas within the campus that would be subject to earthwork activities during each phase. This included the building footprint areas for proposed demolitions and new construction and all affected areas adjacent to the buildings. For example, the activity areas for Phase 1 total 4.7 acres. Phases 2 and 3 would involve combined activity areas of 2.8 and 1.8 acres, respectively. The amount of soil export was calculated based on the assumed excavation of 2.5 feet below the existing grade under the proposed building footprints to allow for building foundations. With regard to the building envelope, which is relied upon for calculating VOCs from architectural coatings, the

combined floor area for all new building and building renovations was used.

Table IV.B-6
Project Anticipated Phasing Plan

Bldg #	ACTIVITIES	AREA	
		ASF	GSF
Phase 1			
	Demolition		
1	Pico Classroom Complex	12,175	18,014
17	Math Complex	27,308	44,872
22	Drescher Hall	64,761	111,145
23	Pico Village	8,190	8,640
27	Campus Police A	1,111	1,400
27	Campus Police B	1,310	1,990
28	Campus Police Annex	1,877	2,000
44	Faculty Village	1,177	1,920
	Subtotal	**117,909**	**189,981**
	New Construction		
A	Pico 1 Business Replacement	49,708	76,474
B	Pico 2 Dresher Replacement	64,832	99,742
C	Police Headquarters	8,400	12,000
	Subtotal	**122,940**	**188,216**
	Renovation		
Z	Life & Physical Sciences Complex	56,801	98,400
	Subtotal	**56,801**	**98,400**
Phase 2			
	Demolition		
5	Maintenance and Operation (M&O)	4,811	6,450
18	Stadium Shops / Facilities Offices	17,043	23,236
19	Student Health & Activities	42,882	59,644
	Subtotal	**64,736**	**89,330**
	New Construction		
D	Student Union	27,300	42,000
E	Maintenance and Operations	16,900	26,000
	Subtotal	**44,200**	**68,000**
	Renovation		
Y	Library & Media Center	78,020	108,673
	Subtotal	**78,020**	**108,673**
Phase 3			
	Demolition		
3	Art Complex	15,065	22,127
6	Business	36,332	53,772
26	Campus Events	1,206	1,600
29	Environmental Center	959	1,400
30	Auxiliary Services	1,685	1,890
	Subtotal	**55,247**	**80,789**
	New Construction		
F	Pearl Street Replacements	5,850	9,000
	Subtotal	**5,850**	**9,000**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.

b) CO Hotspot Analysis

The analysis prepared for CO attainment in the Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of the 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). In the 2003 AQMP, the SCAQMD conducted CO modeling for the four worst-case intersections in the Air Basin, including the intersections of: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The emission data provided in Table 4-10 of Appendix V of the 2003 AQMP demonstrates that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing background CO concentrations, the worst-case CO levels in the Air Basin would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), which is well under the SCAQMD's thresholds of significance of 20 ppm (one-hour average), and 9.0 ppm (eight-hour average), respectively. Based on the ratio of the one-hour CO standard (20.0 ppm) and the modeled worst-case emission value (4.6 ppm), the CO threshold of significance would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. Thus, if a study intersection impacted by a project is below 400,000 vehicles a day, it can reasonably be concluded that the project would not generate a significant CO hotspot impact, and no further analysis is warranted. If a study intersection impacted by the proposed development program exceeds 400,000 vehicles per day, further CO hotspot analysis is recommended.[37]

E. Project Impacts

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

1. Impact Analysis

a) AQMP and SCAG Consistency

The following analysis addresses the Proposed Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance.

[37] The supporting data for this analysis is included in the SCAQMD's 2003 Air Quality Management Plan, Appendix V (2003).

1) Criterion 1

The Proposed Project involves the demolition, rehabilitation and new construction of buildings on an existing college campus that is located near transit within a SCAG-designated High Quality Transit Area (HQTA). Specifically, the Proposed Project would include approximately 265,216 gsf of new construction, 207,073 gsf of building renovations, and 360,100 gsf of building demolition, resulting in a net decrease in total developed floor area. No new parking spaces are proposed. While the Proposed Project anticipates a 3 percent annual increase in on-ground student enrollment above 2025 baseline levels, the projected on-ground student enrollment upon buildout of the Main Campus Update would still remain below historic levels. As such, the Proposed Project is not growth inducing and would not generate additional vehicular traffic. Thus, the Proposed Project would advance regional planning goals to reduce VMT and related mobile source air quality emissions.

As discussed in more detail below, this Draft EIR quantitatively analyzes regional emissions of ROG, NO_X, CO, SO_2, PM_{10} and $PM_{2.5}$ and localized concentrations of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ for daily emissions during construction to ascertain potential effects and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.B-7 and Table IV.B-9 below, neither regional nor localized construction emissions would exceed the applicable significance thresholds.

In addition, this Draft EIR also quantitively analyzes potential regional operational emissions and localized operational emissions from on-site activities. As shown in Table IV.A-8 and Table IV.A-10, neither regional operational nor localized operational impacts would exceed the applicable thresholds of significance. As such, the Proposed Project would not increase the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMD.

CO is the preferred benchmark pollutant for assessing local area air quality impacts from operational motor vehicle operations. Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts that can indicate whether the Proposed Project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the Project Site. As discussed under Threshold (c) of this section and in Table IV.B-8, the Proposed Project would not expose any possible sensitive receptors (such as residential uses, schools, hospitals) to substantial localized CO concentrations. Because the Air Basin is currently in attainment for CO, and existing intersections around the Project Site would not require a CO hotspot analysis, and impacts would be less than significant. Therefore, since the Proposed Project would not exceed any project-level construction and operational SCAQMD thresholds, the Proposed Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP; and impacts would be less than significant.

b) Criterion 2

With respect to the second criterion, the 2022 AQMP was prepared to achieve national and state air pollution standards within the region. Projects that are consistent with the growth projections in the 2020-2045 RTP/SCS are consistent with the 2022 AQMP growth projections. This is primarily because the forecast assumptions used by SCAG form the basis of the land use and transportation control portions of the AQMP.

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these criteria.

1) Is the project consistent with the population, housing, and employment growth projections upon which the AQMP forecasted emissions are based?

A project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the SMC Master Plan Update and SCAG's 2020-2045 RTP/SCS.

SCAG adopted the 2020–2045 RTP/SCS, which is included in the 2022 AQMP. The RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.

The Proposed Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed and are not typically brought from other regions to work on developments such as the Proposed Project. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the Proposed Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2022 AQMP is based.

The Proposed Project would be considered consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. The 2022 AQMP based the projections of air pollutant emissions on SCAG's 2020-2045 RTP/SCS. Moreover, on April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of

the region through projects, investments, policies and strategies.

The Proposed Project involves the renovation and improvement of SMC's Main Campus and would not involve the construction of any residential land uses. The 20204 Master Plan Update predicts enrollment growth would increase approximately 3 percent annually through 2027. However, the projected on-ground student enrollment upon buildout of the Main Campus Update would still remain below historic levels experience as recently as 2019. As a community college, SMC serves a specific geographic region for the benefit of students who already reside in SMC's geographic service area. As such, students and staff include persons who already reside in the area and would not move to the local area to attend the college. Thus, it is anticipated the Proposed Project would not directly increase population in the area. It is not anticipated that the number of faculty would significantly increase, since the 2024 Master Plan Update focuses on efficiencies and would result in a net decrease on total developed floor area. Thus, the Proposed Project would not result in a significant increase to population or employment growth and would be accounted for in the Citywide and regional population projections provided by SCAG's 2020-2045 RTP/SCS and the 2024-2050 RTP/SCS. Thus, the Proposed Project would be consistent with the population, housing, and employment projections of the AQMPs.

2) Does the project implement feasible air quality mitigation measures?

Regarding feasible air quality mitigation measures, the Proposed Project does not have significant impacts that require mitigation. Additionally, the Proposed Project would comply with applicable regulatory measures enforced by the SCAQMD. SCAQMD enforces stationary and mobile source compliance with respect to both operational and construction emissions. The Proposed Project would adhere to current and applicable regulatory compliance measures (including SCAQMD Rule 403: Fugitive Dust, Rule 1113: Architectural Coating, Rule 1108: Cutback Asphalt, and Rule 1146.2: Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters). As such, the Proposed Project is consistent with this criterion.

3) To what extent is project development consistent with the land use policies set forth in the AQMP?

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. SCAQMD combines its portion of the AQMP with those prepared by SCAG. Appendix IV-C to the 2022 AQMP for the Air Basin, include the regional land use and transportation strategies and the transportation control measures contained in SCAG's 2020–2045 RTP/SCS.

With regard to land use developments, the Proposed Project would replace and enhance existing older buildings within an existing college campus, which is consistent with the overall growth pattern encouraged in the RTP/SCS. The Proposed Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, vehicle miles traveled (VMT), and GHG emissions. Specifically, the Project Site is located within a Transit

Priority Area, as defined by SB 743, and a High Quality Transit Area, as defined by SCAG.

SMC's Main Campus is supported by an extensive network of bus and light rail connections and is served by bus lines operated by the City of Santa Monica's Big Blue Bus (BBB). Specifically, a total of six bus lines serve the Project Site and nearby area, including BBB local lines 7, 8, 16, 41, 43, and Rapid 7. These lines serve Santa Monica and the greater Los Angeles area and have stops located adjacent to the Project Site along Pico Boulevard and 20th Street. Additionally, Los Angeles County Metropolitan Transportation Authority's (Metro's) 17th Street Station at 17th Street and Colorado Avenue provides access to Metro's Expo Line. The 17th Street Station is located 0.7 miles to the north of the Project Site. Ridership for SMC students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro.

The increase in transit accessibility and the bicycle parking spaces provided on-site would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. The Proposed Project design would also provide enhancements to pedestrian access that minimizes barriers and links the Project Site with external streets to encourage people to walk instead of drive. By designing the Proposed Project to incorporate these land use strategies identified in the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS, the Proposed Project would serve to reduce both 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.

In conclusion, the Proposed Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Proposed Project would be consistent with the goals and policies of the 2022 AQMP and the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS of reducing regional VMT and the related vehicular air emissions. Therefore, the Proposed Project would not conflict with the control measures of SCAQMD's 2022 AQMP.

2. Santa Monica College Air Quality-Related Programs and Policies

In January 2020, SMC's Board of Trustees adopted Climate Change and Sustainability Policy Goals, as described in more detail in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. 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 improve energy efficiency. The discussion below provides the Proposed Project's consistency with SMC's goals related to reducing air quality.

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 would continue to be provided to students and staff for free. As described previously, ridership for SMC

students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is also free on Metro buses and light rail through Metro's GoPass program, funded by Metro. 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 related to consistency with the applicable air quality policies would be less than significant.

In summary, based on the Proposed Project's consistency with the AQMP's population growth and the Proposed Project's less-than-significant localized impacts, as well as the Proposed Project attributes as an infill development which results in reduced vehicle trips, VMT and emissions, the Proposed Project is consistent with applicable SCAQMD and SCAG air quality policies. Therefore, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts associated with plan consistency would be less than significant.

3. Mitigation Measures

No mitigation measures are required.

4. Level of Significance After Mitigation

As the Proposed Project would be consistent with the 2022 AQMP prior to mitigation, no mitigation measures are required or included, and the impact level would remain less than significant.

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?

1. Impact Analysis

a) Regional Emissions

1) Construction Impacts

Construction of the Proposed Project's proposed land uses have the potential to generate temporary pollutant emissions through the use of heavy-duty construction equipment, such as excavators, graders, tractor/loaders, forklifts, paving equipment, and cranes, and through vehicle trips generated from workers and haul and delivery trucks traveling to and from the Project Site. In addition, fugitive dust emissions would result from certain non-enclosed demolition activities and various soil-handling activities. Mobile source emissions, primarily NOx, would result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather

conditions. The assessment of construction air quality impacts considers each of these potential sources.

The Proposed Project's maximum regional daily construction emissions were quantified utilizing the CalEEMod (Version 2022.1.1.29) computer model as recommended by the SCAQMD. The construction air quality analysis assumes the Proposed Project's compliance with all applicable regulations for construction activities. As noted in Table IV.B-7, below, construction activities would generate a maximum of 14.7 lbs/day of VOC, 25.5 lbs/day of NO_X, 25.5 lbs/day of CO, 0.04 lbs/day of SO_2, 4.16 lbs/day of PM_{10}, and 2.11 lbs/day of $PM_{2.5}$. The Proposed Project's construction-related daily emissions associated with the Proposed Project would be far below the peak daily regional SCAQMD significance thresholds for criteria pollutants during all three construction phases. Therefore, construction impacts are considered to be less than significant.

Table IV.B-7
Estimated Peak Daily Regional Construction Emissions

Construction Phase/Year	Emissions (pounds per day)					
	VOC [a]	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1						
2025	2.71	25.5	25.5	0.04	2.10	1.14
2026	2.57	23.8	24.3	0.04	4.05	2.11
2027	1.50	11.5	20.9	0.03	2.32	0.80
2028	14.70	10.9	20.4	0.03	2.29	0.77
2029	14.60	8.60	12.3	0.02	0.46	0.24
Maximum Emissions Ph. 1	**14.70**	**25.5**	**25.5**	**0.04**	**4.05**	**2.11**
Daily Significance Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 2						
2029	1.37	13.9	15.3	0.04	4.16	2.05
2030	1.26	9.80	15.7	0.03	1.47	0.53
2031	12.8	9.51	15.4	0.03	1.45	0.51
2032	12.8	5.15	8.79	0.01	0.35	0.19
Maximum Emissions Ph. 2	**12.8**	**13.9**	**15.7**	**0.04**	**4.16**	**2.05**
Daily Significance Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 3						
2032	1.22	10.3	13.5	0.03	3.35	1.76
2033	0.95	8.06	11.6	0.02	0.25	0.19
2034	0.93	7.92	11.6	0.02	0.24	0.18
2035	0.81	4.95	8.64	0.01	0.32	0.16
Maximum Emissions Ph. 3	**1.22**	**10.3**	**13.5**	**0.03**	**3.35**	**1.76**
Daily Significance Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[a] As noted in the CalEEMod User Guide, VOC and ROGs are both precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.
Source: CalEEMod (Version 2022.1.1.29), Parker Environmental Consultants, 2025. The CalEEMod worksheets are provided in Appendix C to this Draft EIR.

2) Operational Impacts

Operational emissions generated by area, stationary, and mobile sources would result from normal day-to-day activities on the Project Site after full buildout and occupancy. As stated previously, Proposed Project emissions would be generated by motor vehicles traveling to and from the Project Site, energy use, re-application of architectural coatings, consumer products, and the operation of landscape maintenance equipment. The Proposed Project's maximum regional daily operational emissions were analyzed utilizing the CalEEMod (Version 2022.1.1.29) computer model as recommended by the SCAQMD for each phase of Proposed Project operations and are summarized in Table IV.B.8, below.

Table IV.B-8
Estimated Peak Daily Regional Operational Emissions

Emissions Source	Emissions in Pounds per Day [a]					
	VOC [b]	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	45.5	30.5	365	0.97	103	26.5
Area	36.8	0.77	92.0	0.01	0.16	0.12
Energy	0.66	12.1	10.1	0.07	0.92	0.92
Stationary	1.89	7.34	8.70	0.04	0.59	0.59
Total Project Emissions	**84.85**	**50.71**	**475.8**	**1.09**	**104.67**	**28.13**
Existing Uses to be Demolished [c]	*(110.73)*	*(69.71)*	*(671.62)*	*(1.38)*	*(114.60)*	*(30.86)*
Net Project Emissions	**(25.88)**	**(19.00)**	**(195.82)**	**(0.29)**	**(9.93)**	**(2.73)**
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[a] *The CalEEMod worksheets are provided in Appendix C to this EIR; numbers may not add up due to rounding. All values shown for the Unmitigated Project at Full Buildout reflect the CalEEMod values for operational emissions with mitigation as the mitigation features selected in the model reflect compliance with the 2022 Title 24 Building Energy Efficiency Standards and the College's Net Zero Energy Building goal.*
[b] *As noted in the CalEEMod User Guide, VOC and ROGs are both precursors to ozone so they are summed in the CalEEMod report under the header for ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*
[c] *Includes the demolition of all existing uses on the Project Site.*
Source: CalEEMod (Version 2022.1.1.29), Parker Environmental Consultants, 2025.

As shown in Table IV.B-8, the Proposed Project's operational activities would generate a maximum of 84.85 lbs/day of VOC, 50.71 lbs/day of NO_X, 475.8 lbs/day of CO, 1.09 lbs/day of SO_2, 104.67 lbs/day of PM_{10}, 28.13 lbs/day of $PM_{2.5}$. After netting out emissions associated with the existing buildings to be demolished, the operational emissions associated with the Proposed Project would generate a net decrease in operational emissions compared to existing conditions and thus would not exceed the established SCAQMD threshold levels. Therefore, the Proposed Project's regional operational emissions would result in less than significant regional air quality impacts.

2. Mitigation Measures

The Proposed Project's construction and operational-related impacts with regard to air quality would be less than significant with adherence to all applicable SCAQMD rules and regulations. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

The Proposed Project's construction and operational-related air quality impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level would remain less than significant.

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

1. Impact Analysis

a) Localized On-Site Construction Emissions

This Draft EIR analyzes the daily on-site construction emissions generated by the Proposed Project based on the SCAQMD's localized significance thresholds to determine whether the emissions would cause or contribute to adverse localized air quality that impacts sensitive receptors.

The area surrounding the Project Site consists of primarily residential land uses to the west, east and south. Commercial retail land uses are located to the north along the Pico Boulevard corridor. The multi-family and single-family residential buildings, schools, and motel surrounding the Project Site are considered sensitive receptors, as shown in Figure IV.B-3. As noted in Table IV.B-3, Air Quality Sensitive Receptors, the closest off-site sensitive receptors to the Project Site are the residential land uses located along 16th Street, Pearl Street, 18th Court, and Pico Boulevard. The students and faculty on-site are also considered sensitive receptors for purposes of exposure to localized air quality emissions.

The Project Site encompasses approximately 43 acres. However, buildout of the Proposed Project is proposed to occur in three phases throughout a 10-year period in limited areas within the campus. As noted above, the ground area for each phase of construction would be limited to 4.6 acres in Phase 1, 2.3 acres in Phase 2, and 2.8 acres in Phase 3. Therefore, as specified in the methodology subsection above, localized thresholds for all phases of the Proposed Project's construction program are based on a sensitive receptor distance within 25 meters in SCAQMD's SRA 2 for a Project Site of 5 acres for on-site and off-site sensitive receptors.

As shown in Table IV.B-9, Localized On-Site Maximum Daily Construction Emissions, on-site emissions generated by the Proposed Project would be below the thresholds of significance for localized emissions for NO_X, CO, PM_{10} and $PM_{2.5}$ and thus are well within the margin of safety

established to protect human health. Therefore, the localized air quality impacts resulting from construction emissions associated with the Proposed Project would not expose on- or off-site sensitive receptors to substantial pollutant concentrations. Localized air quality impacts to sensitive receptors would be less than significant.

b) Construction Toxic Air Contaminants Impacts

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the anticipated construction schedule of approximately seven years, the Proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions for land use projects. It is therefore not necessary to evaluate long-term cancer impacts from construction activities which occurs over a relatively short duration. Furthermore, as demonstrated in the analysis above, the Proposed Project's regional and localized construction emissions would fall below the SCAQMD's thresholds of significance for on-site and off-site sensitive receptors, and are therefore presumed to fall within the acceptable levels of emissions with respect to not posing a substantial risk to human health. As such, Proposed Project-related TAC impacts during construction would be less than significant.

c) Off-Site Construction Mobile Source Emissions (CO "Hot Spots" Analysis)

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of CO. As specified in the methodology subsection above, if a project intersection affected by the project does not exceed 400,000 vehicles per day, then it can be reasonably concluded that the localized CO emissions would not exceed the SCAQMD's thresholds of significance.

Table IV.B-9
Localized On-Site Maximum Daily Construction Emissions

Construction Year	Emissions (pounds per day)			
	NO_x [a]	CO	PM_{10}	$PM_{2.5}$
Phase 1				
Demolition - 2025	24.4	23.7	1.62	1.01
Demolition - 2026	22.7	22.8	1.53	0.93
Grading - 2026	15.0	17.4	3.41	1.93
Building Construction - 2026	9.85	13.0	0.38	0.35
Building Construction - 2027	9.39	12.9	0.34	0.31
Building Construction - 2028	8.92	12.9	0.30	0.28
Paving - 2028	5.73	8.81	0.20	0.18
Architectural Coating - 2028	8.63	11.3	0.14	0.13
Architectural Coating - 2029	8.51	11.2	0.12	0.11
Maximum Localized Emissions Phase 1	**24.4**	**23.7**	**3.41**	**1.93**
Phase 2				
Demolition – 2029	10.7	12.4	1.28	0.50
Grading – 2029	11.1	13.8	3.25	1.78
Building Construction – 2029	8.89	11.6	0.26	0.24
Building Construction – 2030	8.7	11.6	0.24	0.22
Building Construction – 2031	8.46	11.5	0.23	0.21
Paving - 2032	5.12	8.13	0.16	0.15
Architectural Coating – 2031	2.21	2.65	0.02	0.02
Architectural Coating – 2032	2.20	2.64	0.02	0.02
Maximum Localized Emissions Phase 2	**11.1**	**13.8**	**3.25**	**1.78**
Phase 3				
Demolition - 2032	9.37	11.7	1.11	0.43
Grading - 2032	9.5	13.0	3.17	1.72
Building Construction - 2032	8.21	11.5	0.21	0.19
Building Construction - 2033	8.02	11.4	0.19	0.17
Building Construction - 2034	7.87	11.4	0.17	0.16
Architectural Coating - 2034	2.19	2.64	0.01	0.01
Paving - 2035	4.93	8.08	0.13	0.12
Architectural Coating - 2035	2.19	2.63	0.01	0.01
Maximum Localized Emissions Phase 3	**9.37**	**11.7**	**3.17**	**1.72**
Maximum Localized Construction Emissions [b]	**24.4**	**23.7**	**3.41**	**1.93**
SCAQMD Localized Significance Thresholds [c]	221	1,531	13	8
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:

[a] *The localized thresholds listed for NOx in this table takes into consideration the gradual conversion of NO_X to NO_2. The analysis of localized air quality impacts associated with NOx emissions is focused on NO_2 levels as they are associated with adverse health effects.*

[b] *Calculations for localized PM_{10} and $PM_{2.5}$ emissions reflect compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings.*

[c] *The localized thresholds for all phases are based on a receptor distance of 25 meters in SCAQMD's SRA 2 for a Project Site of 5 acres.*

Source(s): SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009; Sample Construction Scenarios for Projects Less than Five Acres in Size. CalEEMod worksheets are provided in Appendix C to this EIR. Parker Environmental Consultants, 2025.

1) Construction CO Hotspots

The highest number of daily trips from construction would occur during Phase 1. It is estimated that during this phase approximately 167 construction worker and vendor trips would occur in one day. The estimated average daily traffic volumes along the Pico Boulevard corridor fronting SMC's Main Campus are estimated to be 36,000 average daily trips.[38] Thus, the Proposed Project's construction traffic volumes, when combined with the existing traffic volumes along the Pico Boulevard corridor, would be well under the 400,000 vehicles per day that would be required to generate CO exceedances as evaluated in the 2003 AQMP. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations along Pico Boulevard would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. Therefore, 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. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

2) Operational CO Hotspots

The Proposed Project consists of the demolition of existing temporary and permanent buildings, totaling approximately 360,100 gsf of building area, and the construction of new buildings consisting of 265,216 gsf of new floor area in five main new buildings, which would result in a net decrease of floor area. The Proposed Project would not result in the generation of additional employees, residents, or students at the Main Campus as compared to historical enrollment data. 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. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

d) Localized Operational Air Quality Impacts

Operation of the Proposed Project would not introduce any major new point sources of air pollution within the Project Site. Operation of the Proposed Project would replace existing institutional and academic buildings with new and rehabilitated buildings. The Proposed Project would not introduce significant new sources of localized emissions to the area such as large commercial or industrial facilities, which are typically associated with high sources of localized emissions. Nevertheless, the Proposed Project would emit criteria pollutants in the local vicinity during operation.

[38] City of Santa Monica, Pico Boulevard Pedestrian Improvement Plans, https://www.santamonica.gov/Media/PCD/Mobility/PicoPed_ProjectPlans.pdf, accessed March 2025.

Table IV.B-10, below, summarizes the net amount of on-site emissions from the operation of the Proposed Project at full buildout. As shown, the Proposed Project's on-site localized emissions would not exceed any of the localized thresholds for Proposed Project operations. Therefore, the localized air quality impacts resulting from operation emissions associated with the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized on-site operational emissions would be less than significant.

Table IV.B-10
Localized On-Site Maximum Daily Operational Emissions

Operational Phases	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Operational Emissions at Full Buildout (Phases 1, 2 and 3)				
Area	0.77	92.0	0.16	0.12
Energy	12.1	10.1	0.92	0.92
Stationary	7.34	8.70	0.59	0.59
Maximum Localized Operational Emission [a]	**20.21**	**110.80**	**1.67**	**1.63**
Less Existing Localized Operational Emissions	*(15.11)*	*(112.62)*	*(1.60)*	*(1.56)*
Net Localized Operational Emissions	**5.10**	**(1.82)**	**0.07**	**0.07**
SCAQMD Localized Significance Thresholds [b]	221	1,531	3	2
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
[a] *The CalEEMod worksheets are provided in Appendix C to this EIR.*
[b] *The localized thresholds for all phases are conservatively based on a receptor distance of 25 meters in SCAQMD's SRA 2 for a Project Site of 5 acres.*
Source(s): SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009; Sample Construction Scenarios for Projects Less than Five Acres in Size. Parker Environmental Consultants, 2025.

e) Operational Toxic Air Contaminants Impacts

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective*, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The Proposed Project consists of demolishing, renovating, and building new educational buildings and would not involve any land uses or activities that would require the use, storage, or processing of carcinogenic or non-carcinogenic TACs. The primary sources of potential air

toxics associated with project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Proposed Project, are not considered land uses that generate substantial TAC emissions. Furthermore, as discussed above the Proposed Project's net developed building area is expected to decrease as compared to existing conditions. As such, emissions associated with operating building systems would also decrease as compared to current conditions. The renovation of interior buildings would also serve to bring older buildings up to current energy efficiency standards, further reducing demands for energy and HVAC systems. In conclusion, on-site localized emissions from the Proposed Project's construction and operations would not exceed the established SCAQMD localized thresholds. Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

2. Mitigation Measures

Localized construction and operational air quality impacts and impacts associated with toxic air emissions would be less than significant prior to mitigation. Thus, no mitigation measures are required.

3. Level of Significance After Mitigation

As discussed above, localized construction and operational air quality impacts would be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level would remain less than significant.

F. Cumulative Impacts

1. Impact Analysis

a) AQMP Consistency

Cumulative development throughout the Air Basin can affect implementation of the 2022 AQMP. The 2022 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2022 AQMP regional growth forecast would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Air Basin is within the projections for growth identified by SCAG, implementation of the 2022 AQMP would not be obstructed by such growth, and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections in the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS and is consistent with the regional growth policies to increase density by providing infill development in high quality transit areas, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or

obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2022 AQMP would be less than significant.

b) Construction and Operational Emissions

The SCAQMD recommends evaluating cumulative impacts for individual projects based on whether the project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts for those pollutants for which the Air Basin is in non-attainment. Thus, the cumulative analysis of air quality impacts follows SCAQMD's guidance such that construction or operational Proposed Project emissions will be considered cumulatively considerable if Proposed Project-specific emissions exceed an applicable SCAQMD recommended significance threshold.

As shown in Table IV.B-7 and in Table IV.B-8, respectively, construction and operational daily emissions would not exceed any of the SCAQMD's regional thresholds, respectively. Further, construction and operation of the Proposed Project would have a less-than-significant impact on localized emissions, as shown in Table IV.B-9 and Table IV.B-10, respectively. Therefore, the Proposed Project's contribution to cumulative impacts would not be cumulatively considerable, and, therefore, the Proposed Project would have a less than significant cumulative impact to regional air quality.

2. Mitigation Measures

Cumulative impacts with regard to air quality would be less than significant during construction and operation of the Proposed Project. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Cumulative impacts related to air quality during both construction and operation of the Proposed Project were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level would remain less than significant.

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IV.C Cultural Resources

A. Introduction

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, as well as the disruption of human remains, that could result from implementation of the Proposed Project. Historical Resources include all properties (historic, archaeological, landscapes, traditional, etc.) eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section is based in part on the information provided in the Historic Resources Technical Report (Historical Report), prepared by Historic Resources Group (HRG), dated March 2025. The Historical Report is provided in Appendix D of this Draft EIR.

B. Environmental Setting

1. Regulatory Framework

Cultural resources fall within the jurisdiction of several levels of government. The framework for the identification and, in certain instances, protection of cultural resources is established at the federal level, while the identification, documentation, and protection of such resources are often undertaken by state and local governments. As described below, the principal federal, state, and local laws governing and influencing the preservation of cultural resources of national, state, regional, and local significance include:

- National Historic Preservation Act of 1966, as amended
- Secretary of the Interior's Standards for the Treatment of Historic Properties
- Native American Graves Protection and Repatriation Act
- Archaeological Resources Protection Act
- Archaeological Data Preservation Act
- California Environmental Quality Act
- California Register of Historical Resources
- California Health and Safety Code
- California Public Resources Code
- City of Santa Monica Landmarks and Historic District Ordinance

a) Federal

1) National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment."[1] The National Register recognizes a broad range of cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[2]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties."[3] A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries.[4]

i) Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

1 36 Code of Federal Regulations (CFR) 60.

2 United States Department of the Interior, National Park Service, "National Historic Landmarks: Frequently Asked Questions," https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs.htm. (accessed May 2025).

3 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, (Washington D.C.: National Park Service, 1995), 5.

4 United States Department of the Interior, National Register Bulletin #16: How to Complete the National Register Registration Form, 1997, Appendix IV: 2.

A. Are associated with events that have made a significant contribution to the broad patterns of our history;
B. Are associated with the lives of persons significant in our past;
C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Have yielded, or may be likely to yield, information important in prehistory or history.[5]

ii) Eligibility of Properties Less than 50 Years Old

The National Register Criteria for Evaluation excludes properties that achieved significance within the past 50 years unless they are of exceptional importance (Criteria Consideration G). 50 years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places. The phrase "exceptional importance" does not require that the property be of national significance. It is a measure of a property's importance within the appropriate historic context, whether the scale of that context is local, State, or national.

iii) Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[6] According to National Register Bulletin #15, the National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.[7] To retain historic integrity a property must possess several, and usually most, of these seven aspects.[8] Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.[9] In general, the National Register has a higher integrity threshold than State or local registers.[10]

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5 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, 8.

6 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, 44.

7 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, 44.

8 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, 44.

9 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, 44.

10 California Office of Historic Preservation, Technical Assistance Series #6: California Register and National Register, no date, 2.

These seven aspects or qualities that comprise integrity are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.[11]

iv) Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic districts. The National Park Service defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." A historic district derives its significance as a single unified entity.[12]

According to the National Park Service, "a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole." Examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas, and rural villages.[13]

[11] U.S. Department of the Interior, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, 44-45.

[12] National Register Bulletin 16A: How to Complete the National Register Registration Form. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997. (42)

[13] Ibid.

2) Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act requires federal agencies to return Native American cultural items to the appropriate Federally recognized Indian tribes or Native Hawaiian groups with which they are associated.

3) Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 governs the excavation, removal, and disposition of archaeological sites and collections on federal and Native American lands. This act was most recently amended in 1988. The ARPA defines archaeological resources as any material remains of human life or activities that are at least 100 years of age, and which are of archeological interest. The ARPA makes it illegal for anyone to excavate, remove, sell, purchase, exchange, or transport an archaeological resource from federal or Native American lands without a proper permit.

4) Archaeological Data Preservation Act

The Archaeological Data Preservation Act requires agencies to report any perceived project impacts on archaeological, historical, and scientific data and requires agencies to recover such data or assist the Secretary of the Interior in recovering the data.

b) State

1) California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

CEQA Guidelines Section 15064.5 recognizes that historical resources include (1) resources listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) resources included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any objects, buildings, structures, sites, areas, places, records, or manuscripts, which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 and CEQA Guidelines Section 15064.5 apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of PRC Section 21083, if it meets the criteria of a unique archaeological resource. As defined in PRC Section 21083.2, a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of PRC Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place. If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.[14]

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired". According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
B. Account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

[14] 14 CFR § 15064.5(c)(4).

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (rev. 2017), Grimmer, is considered to have impacts that are less than significant.[15]

2) California Register of Historical Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[16] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.[17] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:[18]

1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or;
2. Is associated with the lives of persons important to local, California or national history; or;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

[15] 14 CFR § 15331.

[16] California Public Resources Code, Section 5024.1[a].

[17] California Public Resources Code, Section 5024.1[b]

[18] California Public Resources Code, Section 5024.1[c].

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.[19]

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:[20]

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:[21]

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

3) California Health and Safety Code

California Health and Safety Code Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains (except as allowed under applicable PRC Sections), and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

[19] California Office of Historic Preservation, "Technical Assistance Series #6: California Register and National Register," no date.

[20] California Public Resources Code, Section 5024.1[d].

[21] California Public Resources Code, Section 5024.1[e].

4) California Public Resources Code

California Public Resources Code (PRC) Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

c) Local

1) City of Santa Monica

In 1976, the City of Santa Monica adopted the Landmarks and Historic District Ordinance.[22] The ordinance includes criteria and procedures for designating City of Santa Monica Landmarks, Structures of Merit, and Historic Districts. Landmarks may include structures, natural features, or any type of improvement to a property that is found to have particular architectural or historical significance to the City. Landmarks are considered to have the highest level of individual historical or architectural significance locally. Structures of Merit are historic resources with a more limited degree of individual significance. In 1992, the City became a Certified Local Government (CLG) and has continued its involvement in the state's program under the Office of Historic Preservation.

i) City of Santa Monica Landmark

The Santa Monica Landmarks Commission may approve the landmark designation of a structure, improvement, natural feature or an object if it finds that it meets one or more of the following criteria, outlined in Santa Monica Municipal Code Section 9.56.100(A):

1. It exemplifies, symbolizes, or manifests elements of the cultural, social, economic, political or architectural history of the City.

[22] City of Santa Monica, "Landmarks and Historic District Ordinance, Section 9.36.100," March 24, 1976. Added by Ord. No. 2486CCS §§ 1, 2, adopted June 23, 2015; Amended by Ord. No. 2520CCS § 56, adopted June 14, 2016.

2. It has aesthetic or artistic interest or value, or other noteworthy interest or value.
3. It is identified with historic personages or with important events in local, state or national history.
4. It embodies distinguishing architectural characteristics valuable to study of a period, style, method of construction, or the use of indigenous materials or craftsmanship, or is a unique or rare example of an architectural design, detail or historical type valuable to such a study.
5. It is a significant or a representative example of the work or product of a notable builder, designer or architect.
6. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

ii) City of Santa Monica Historic Districts

A historic district is defined by the City of Santa Monica as "any geographic area or noncontiguous grouping of thematically related properties that the City Council has designated as and determined to be appropriate for historical preservation pursuant to the provisions of this [ordinance]." In order to be designated a historic district, an area must meet one of the following criteria, outlined in the Santa Monica Municipal Code [§9.56.100(B)]:

1. Any of the criteria for a Landmark designation
2. It is a noncontiguous grouping of thematically related properties or a definable area possessing a concentration of historic, scenic or thematic sites, which contribute to each other and are unified aesthetically by plan, physical development or architectural quality.
3. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning.
4. It has a unique location, a singular physical characteristic, or is an established and familiar visual feature of a neighborhood, community or the City.

iii) City of Santa Monica Structure of Merit

The Santa Monica Landmarks Commission may approve the designation of an improvement as a structure of merit if it finds that it merits official recognition because it has one or the following characteristics, outlined in Santa Monica Municipal Code Section 9.56.080:

1. The structure has been identified in the City of Santa Monica's Historic Resources Inventory.
2. The structure is a minimum of 50 years of age and meets one of the following criteria:
    A. The structure is a unique or rare example of an architectural design, detail or historical type.
    B. The structure is representative of a style in the City of Santa Monica that is no longer prevalent.

C. The structure contributes to a potential historic district.

d) Development History of SMC and the Project Site

Santa Monica College, originally Santa Monica Junior College (1929-1945), and later Santa Monica City College (1945-1970), was established in 1929. Santa Monica Junior College opened in the fall of 1929, holding classes on the second floor of Santa Monica High School, with a maximum enrollment of 350 students.[23] In 1937, the Santa Monica Technical School was established on a 5 ½ acre site at the corner of 23rd Street and Pico Boulevard. In 1940, the Board of Education approved the purchase of 16 acres on Pearl Street, east of 17th Steet, and requested an option after one year to purchase an additional 10 adjoining acres. The name of the school was changed to Santa Monica City College in 1944. In 1945, the college and Santa Monica Technical School merged.

In 1946, following the conclusion of World War II, the Board of Education chose the architectural firm of Marsh, Smith and Powell to design the new campus.[24] Construction for the Arts Complex began in 1950 and the building was completed in 1952. In 1952, Santa Monica City College officially opened. Campus construction continued in the late 1950s and 1960s. In 1957 construction began on additional buildings, including the music complex (not extant), a gymnasium, cafeteria, foreign language and computer labs, as well as additions to the Student Union including a cafeteria and student store. The gymnasium was designed by Smith, Powell and Morgridge, the successor firm of Marsh, Smith and Powell. The buildings were constructed by contractor Herbert Goldsworthy.

The collection of buildings designed by Marsh, Smith and Powell for the campus during this period reflects the principles of Mid-century Modernism. Mid-century Modernism describes the post-World War II iteration of the International Style. The International Style is characterized by geometric forms, smooth wall surfaces, and an absence of exterior decoration.

The Technology Building (now known as Drescher Hall) was designed by Powell, Morgridge, Richards and Coghlan, the successor firm of Smith, Powell and Morgridge, and completed in 1969. Approval of an additional bond in 1966, state and federal funding, and the Associated Students organization provided funding for continued campus growth.[25] In 1970, the name of the college was changed from Santa Monica City College to Santa Monica College.

In 1975 SMC acquired adjacent land along Pearl Street that was already occupied with single-family residences primarily constructed in the 1940s; these were converted for use for student

[23] Preparation for New Campus Completed," Corsair, Vol. 22, No. 9, November 9, 1949.

[24] A detailed history of the architectural firm Marsh, Smith And Powell is provided in the Historic Resources Technical Report, contained in Appendix D to this Draft EIR.

[25] "Santa Monica College Master Planning History," Santa Monica College, www2.smc.edu/planning.

services and as offices for the school.[26] Campus improvements and new facilities continued through the 1970s and 1980s. In 1973, the firm Daniel, Mann, Johnson and Mendenhall (DMJM) was hired to work on updating the SMC Master Plan, including alterations to existing facilities and new construction.[27] In 1980-1981, a business building and a new library (also designed by DMJM) were completed. In 1981, a new four-story parking structure (not extant) was constructed in an effort to address the campus parking needs. The former library was renovated and became the Letters and Science Building (not extant) in 1983.

In 1990, a five-year construction plan consisted of nine projects, including the remodeling of the Student Health and Activities Building, adding a second floor to the building above the Cafeteria wing, the construction of two parking structures adjacent to the Business Building (which opened in 1991), the addition of a third story to the Technology Building (now Drescher Hall), remodeling the student government offices in the Amphitheater Building (not extant) into classrooms and staff offices, remodeling the automotive-repair area, and expanding the Library.[28] Following the 1994 Northridge Earthquake, the Science Building and the 1981 parking structure were demolished and campus upgrades were planned as a result, including the construction of a new Physical and Life Sciences Building to replace the Science Building. The new building was designed by the Los Angeles-based firm Anshen & Allen; the project broke ground in 1997 and was completed in 1999.[29]

In 1998, a new Master Plan was adopted, based on specific planning principles to create a more cohesive campus following the ad hoc development of the previous decades. The plan was updated in 2002. Projects identified in the plan included a new pool complex, an expansion to the existing parking structure, including a new pedestrian bridge and entryway, the new Science building, the Library expansion, the new Humanities and Social Sciences building complex, the new Theatre Arts building, and the new campus quad. The plan also identified sites for a new student services building and a new underground parking structure. Funding sources for these improvements included an additional bond,

In 2000, the architectural firm of Pugh + Scarpa received the commission for updates to the Art Department, including converting existing gallery space into additional classrooms.[30] In 2006 a new Theater Arts Building, designed by Leo A. Daly, was completed. It replaced the existing children's theater on campus. In 2007, a new Humanities and Social Sciences (HSS) Building was completed; the building replaced the Liberal Arts Building, which had suffered earthquake damage. The HSS building was co-designed by Gensler and the local architectural firm of Renzo Zecchetto Architects. That same year, additional improvements to the campus were

[26] "Student Body Pays $53,349 for House," Corsair, Vol. 47, Number 12, December 10, 1975.

[27] "Campus Makes Renovations," Corsair, Vol. 44, No. 26, May 23, 1973.

[28] "To Continue, Plans Show," Corsair, Vol. 60, No. 19, February 21, 1990.

[29] "New Science Building Emerges from the Rubble," Corsair, Vol. 72, No. 2, September 16, 1988.

[30] "Future Facelift for Art Building," Corsair, Vol. 80, No. 13, November 29, 2000.

planned, which necessitated the demolition of the Admissions and Student Services Complex, Counseling Annex, Amphitheater, Music Complex, Concert Hall, and Counseling Complex.

A new five-year master plan was completed in 2010, to provide for the implementation of additional improvement projects identified in a 2008 bond measure. The plan identified locations for new buildings, along with guidance for open space, sustainability, pathways, and setbacks, among other criteria. This included a new Information Technology Building, and the Health, PE, Fitness, Dance, and Central Plant Building.

A detailed description of the extant buildings on the Project Site is included in Figure 5 of the Historic Resources Technical Report, which is provided as Appendix D to this Draft EIR. A detailed description of the alterations to the extant buildings on the Project Site developed in the immediate post-World War II era is included in Figure 6 of the Historic Resources Technical Report.

e) Summary of Previous Historic Evaluations

Neither the Main Campus of SMC nor any individual buildings have been designated at the federal, state, or local levels. The City of Santa Monica has conducted several comprehensive historic resource surveys documenting potential historic resources found within the City's borders, beginning with the first survey in 1983. Additional surveys followed in 1986 and 1993, and updates were completed in 1994, 1997, 2002, 2004, 2006, 2010, and 2018. None of the improvements on the SMC Main Campus has been identified as a potential historical resource in any of the City's historic resources surveys. In the Citywide Historic Context Statement prepared in 2017-2018, Santa Monica College is included in the narrative history of institutional development from the post-World War II era; however, because the campus generally is not visible from the public right-of-way, it was not evaluated as part of the Historic Resources Inventory Update conducted at that time.[31]

1) Built Environment Resource Directory (BERD)

The California Office of Historic Preservation (OHP) maintains the Built Environment Resource Directory (BERD), a database of previously evaluated resources throughout the state. The BERD contains information only for cultural resources that have been processed through OHP. This includes resources reviewed for eligibility for the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs. In 2019, Drescher Hall was evaluated for potential eligibility for listing in the National Register of

[31] City of Santa Monica, "Citywide Historic Resources Inventory Update Survey Report," prepared by Architectural Resources Group and Historic Resources Group, August 9, 2018, Appendix D, 1.

Historic Places as part of review under Section 106 of the National Historic Preservation Act.[32] That study determined that the building was not eligible for listing in the National Register, and it was assigned the California Historical Resources Status Code of 6Y, which is defined as "Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or local listing."[33] No other buildings or campus features are listed in the BERD.

f) Existing Conditions

1) Existing Uses on the Project Site

The SMC Main Campus occupies several parcels in the Sunset Park neighborhood in the southeast portion of the City of Santa Monica, comprising approximately 43 acres in total. The central portion of the Main Campus occupies a trapezium-shaped parcel of approximately 39.82 acres bounded on the north by Pico Boulevard, on the east by 18th Court and by the rear and side of residential properties fronting on 20th Street and Pearl Street; on the south by Pearl Street; and on the west by 16th Street. SMC also occupies four parcels on the south side of Pico Boulevard between 14th Street and 16th Street, and two parcels at the northeast corner of 14th Street and Bay Street, totaling approximately 2.25 acres; and seven parcels on the south side of Pearl Street between 17th Street and 20th Street, totaling approximately 0.93 acres.

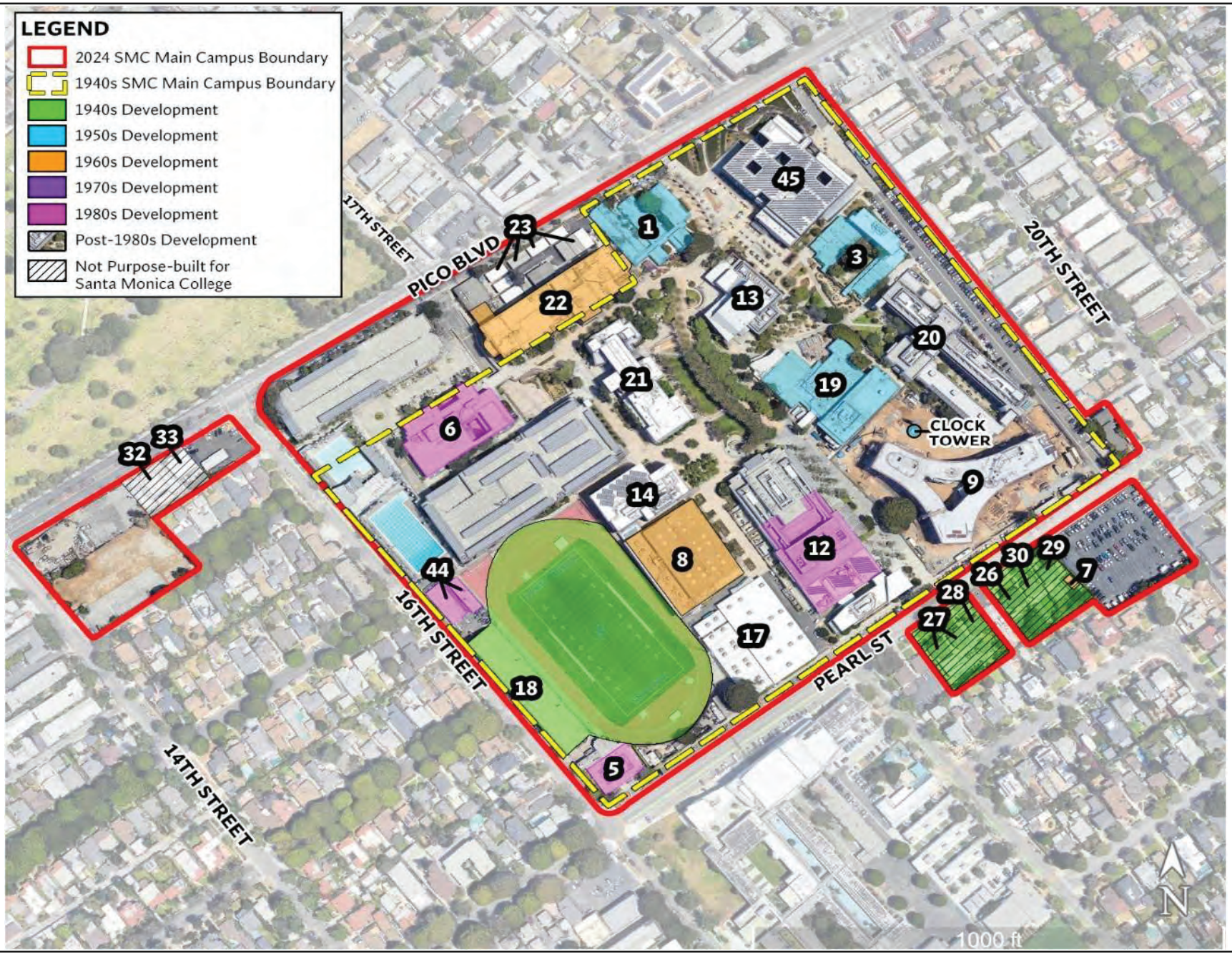
The central portion of the Main Campus consists of eighteen (18) buildings and building complexes, an athletic field and track, a swim center, two (2) parking structures, one (1) surface parking lot, a central quad, gardens, and landscaped walkways. The Main Campus as it exists today represents multiple phases of development from the late 1940s to the present and does not reflect a cohesive, singular design vision. Most of the existing buildings and landscape features are the result of ad hoc development from the 1950s into the 1970s, or of the master plans of the late 1990s and early 2000s. Many of these were subsequently altered.

The Pico Boulevard parcels are occupied by two (2) buildings and surface parking lots. The 14th and Bay Street parcels are occupied by a building that is currently under construction. The Pearl Street parcels are occupied by six (6) buildings and a surface parking lot.

The current site plan depicting the extant buildings on the Main Campus from each period of development is shown in Figure IV.C-1, below and summarized in the corresponding Table IV.C-1. Additional detailed information including a description of the Main Campus buildings and photographs depicting the current conditions is provided in Appendix D to this Draft EIR.

[32] California Office of Historic Preservation, "Built Environment Resource Directory: Los Angeles County," 2024.

[33] California Historical Resources Status Codes, https://ohp.parks.ca.gov/pages/1068/files/Resource-Status-Codes.pdf.



Source: Historic Resources Group, Santa Monica College Master Plan Historic Resources Technical Report, March 2025.

Figure IV.C-1
Site Plan By Decade of Development

Table IV.C-1
Extant Main Campus Buildings

Map No.	Building Name	Historic Name	Construction Date	Architect	Builder
1	Pico Classroom Complex	Vocational Arts Building	1957	Marsh, Smith, and Powell	
3	Art Complex	Art Complex	1952	Marsh, Smith, and Powell	
5	M&A Extension [a]		c. 1980		
6	Business Building	Business Building	1980	DMJM	Stole Inc.
8	Gymnasium		1960	Marsh, Smith, and Powell	Herbert Goldsworthy
9	Math and Science		2024	Cannon Design	Icon West
12	Library and Media Center		1980; 2003	DMJM (1980); CO Architects (2003)	
13	Theater Arts		2006	Leo A. Daly	
14	Core Performance Center		2016	Gensler	
17	Math Complex		1955		
18	Stadium Shops/Facilities Office		1948	Marsh, Smith, and Powell	
19	Student Health & Activities		1951; 1959; 1990; 2003	Marsh, Smith, and Powell	Herbert Goldsworthy (1959)
20	Life and Physical Science Complex		1999	Anshen & Allen	
21	Humanities & Social Science		2007	Gensler and Renzo Zecchetto Architects	
22	Dresher Hall		1969	Powell, Morgridge, Richards & Coghlan	
23	Pico Village		c. 2000		
44	M&O Extension	Faculty Village	c. 1980		
45	Student Services Center		2019	Huitt-Zollars	
Blue Dot	Clock Tower	Clock Tower	1955		
Pearl Street Parcels					
26	Campus Events	1734 Pearl St.	1944 [b]		Imperial Homes, Inc.
27	Campus Police Buildings A & B	1714-1718 Pearl St.	1944 [c]		Imperial Homes, Inc.

Map No.	Building Name	Historic Name	Construction Date	Architect	Builder
28	Campus Police Annex	1724 Pearl St.	1944 [b]		Imperial Homes, Inc.
29	Environmental Center; Sustainability Center	1744 Pearl St.	1944 [d]		Imperial Homes, Inc.
7	Greenhouse		1955		
30	Auxiliary Services	1738 Pearl St.	1944 [e]		Imperial Homes, Inc.
Pico Boulevard					
32	Pico Annex 1510		2001	AHT Architects (Emmilio Arechaderra)	T. Elliot/Drinkward Const, Inc
33	Pico Annex 1516		1991	Art Function Inc.	Elder-Hawkins & Associates, Inc

Notes:
[a] Formerly known as the ESL building.
[b] Became part of campus in 1977.
[c] Became part of campus in 1970 and 1976.
[d] Became part of campus in 1975.
[e] Became part of campus in 2003.
Source: Historic Resources Group, Santa Monica College Master Plan Historic Resources Technical Report, March 2025. See Appendix D to this Draft EIR.

C. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Proposed Project would have a significant impact related to cultural resources if it would:

Threshold (a): Cause a substantial adverse change in significance of a historical resource pursuant to Section 15064.5;

Threshold (b): Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Threshold (c): Disturb any human remains, including those interred outside of dedicated cemeteries.

1. Historical Resources

The thresholds for determining the significance of environmental effects on historical resources are derived from the State CEQA Guidelines as defined in Section 15064.5. According to the State CEQA Guidelines Section 15064.5(b), a project involves a "substantial adverse change" in the significance of the resource when one or more of the following occurs:

1) Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
2) The significance of a historical resource is materially impaired when a project:
   a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historical Resources; or
   b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
   c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource.

Accordingly, a project would have a significant impact on historical resources if:

- The project would materially impair the eligibility of a building, structure or site as a historic resource such that it would no longer be eligible for inclusion in the California Register or local register.

2. Archaeological Resources and Human Remains

As defined in Section 21083.2 of CEQA a “unique” archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines Section 15064.5(c)(4)).

D. Methodology

Under CEQA, the evaluation of impacts to historical resources requires a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources, and if so; (2) a determination of whether the Proposed Project will result in a "substantial adverse change" in the significance of the resource or resources. A "substantial adverse change" in the significance of an historical resource is an alteration that materially impairs the physical characteristics that convey its historical significance and justify its eligibility for listing.

For purposes of evaluating potential impacts upon historical resources, this section is based on the findings and conclusions of the Historical Resource Technical Report prepared by HRG, dated March 2025 (See Appendix D to this Draft EIR). The Historical Resource Technical Report documents HRG's research and evaluation of the Project Site for potential eligibility as a historic district and individual buildings and site features on the campus were reviewed for potential individual eligibility for historic significance.

The Project Site was evaluated using integrity thresholds and eligibility criteria for listing in the National Register, as well as the California Register, and for local designation in the City of Santa Monica. The specific eligibility criterion for federal, state, and local designations are addressed above under Subsection B) Regulatory Framework. The field methods and analysis are based on guidance from the National Park Service and COHP for evaluating potential historic resources; and identification and evaluation of physical features and historic integrity ascertained during HRG's site visit and through research and consideration of building records, historic photographs and other relevant documentation and research.

E. Project Impacts

Threshold (a): Would the Project cause a substantial adverse change in significance of a historical resource pursuant to Section 15064.5?

1. Impact Analysis

a) Direct Impacts

The Proposed Project includes the demolition of existing temporary and permanent buildings, totaling approximately 360,100 gsf of building area, the construction of new buildings consisting of 265,216 gsf of new floor area, and the renovation of 207,073 gsf of building area. The name and location of the buildings to be demolished and renovated are identified in Table II-4, Proposed Development Summary and Figure II-6, Proposed Demolition Plan, in Section II, Project Description. As discussed above under Subsection IV.C.B.1.e, and the Historic Resources Technical Report contained in Appendix D to this Draft EIR, none of the buildings on the Project Site warrants treatment 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.

b) Indirect Impacts

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.

2. Mitigation Measures

Proposed Project impacts related to historic resources would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Proposed Project impacts related to historic resources would be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level would remain less than significant.

Threshold (b):	**Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.**

1. Impact Analysis

A significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources which presently exist within the Project Site. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources.

As discussed above, the SMC Main Campus was established in its current location in 1940, with construction beginning after World War II. The first buildings were completed in the early 1950s. 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. The found deposits shall be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction activities in the area where resources were found may resume once the identified resources are properly assessed and processed by a qualified archeologist. 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.

2. Mitigation Measures

No mitigation measures are required.

3. Level of Impact After Mitigation

The level of impact after mitigation would be less than significant and no mitigation measures are required.

Threshold (c): Disturb any human remains, including those interred outside of dedicated cemeteries.

1. Impact Analysis

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 Proposed 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.

1. Mitigation Measures

No mitigation measures are required.

2. Level of Impact After Mitigation

The level of impact after mitigation would be less than significant and no mitigation measures are required.

F. Cumulative Impacts

1. Impact Analysis

The purpose of this section is to analyze the cumulative impacts that may result from the Proposed Project in conjunction with other past, present, and reasonably foreseeable future projects in the area. Cumulative impacts refer to the incremental effects on the environment that result from the combined actions of multiple projects or activities, even though each project may individually have a minor effect.

Development of the Proposed Project in combination with the 26 related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to historical resources are typically site-specific and are assessed on a site-by-site basis. As such, it should be noted that each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address historical resources.

The analysis of the Proposed Project's direct and indirect impacts to historical resources concluded that the Proposed Project would have no significant direct nor indirect impacts with respect to historical resources following appropriate regulatory guidance. For purposes of assessing cumulative impacts upon historic resources, cumulative impacts would similarly be limited to the areas adjacent to and within the immediate viewshed of the Project Site. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to historical resources would be less than significant.

2. Mitigation Measures

Cumulative impacts related to historical resources would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Cumulative impacts related to historical resources would be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level would remain less than significant.

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IV.D Energy

A. Introduction

This section analyzes impacts on energy resources due to construction and operation of the Proposed Project. Pursuant to Section 21100(b) of the California Public Resources Code (PRC) all State Agencies, Boards, and Commissions shall assess the environmental impacts of projects for which they are a Lead Agency under CEQA to determine whether a project could result in significant effect on the environment, including effects from the wasteful, inefficient, and unnecessary consumption of energy, and to identify mitigation measures to minimize any such significant effects. Furthermore, Section 15126.2(b) of the State CEQA Guidelines states that if analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary consumption use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. Accordingly, utilizing guidance from Appendix F of the State CEQA Guidelines, this EIR includes relevant information and analyses that address the energy implications of the Proposed Project, focusing on the following three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Detailed energy calculations supporting this analysis can be found in Appendix E of this Draft EIR.

B. Environmental Setting

1. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding energy at the federal, state, regional, and local levels that are applicable to the Proposed Project. As described below, these plans, guidelines, and laws include the following:

- Energy Independence and Security Act of 2007
- Corporate Average Fuel Economy Standards
- Federal Energy Policy and Conservation Act
- Phase 1 and 2 Heavy-Duty Vehicle GHG Standards
- Public Utility Regulatory Policies Act of 1978
- National Energy Policy Act of 1992
- Energy Policy Act of 2005
- Clean Air Act
- Clean Cities Program
- Senate Bill 1389
- Renewables Portfolio Standards
- California Building Standards
    - California Building Energy Efficiency Standards

    - California Green Building Standards
- California Assembly Bill 1493
- California Air Resources Board
    - Scoping Plan
    - Advanced Clean Car Program
    - Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
    - In-Use Off-Road Diesel Fueled Fleets Regulation
- Senate Bill 375
- Regional Transportation Plan/Sustainable Communities Strategy
- SMC Board of Trustees: Climate Change and Sustainability Policy Goals

a) Federal

1) Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve, the Energy Conservation Program for Consumer Products, and CAFE regulations.

2) Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The NHTSA and the USEPA jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for (1) technological feasibility, (2) economic practicality, (3) effect of other standards on fuel economy, and (4) need for the nation to conserve energy.

On June 7, 2024, the NHTSA established revised standards that would require an industry-wide fleet average of approximately 50.4 miles per gallon (mpg) in model year 2031 for passenger cars and light trucks, and an industry fleet-wide average for Heavy Duty Pick-Ups and Vans (HDPUVs) of roughly 2.851 gallons per 100 miles in model year 2035. The final CAFE standards increase at a rate of 2 percent per year for passenger cars in model years 2027-31 and 2 percent per year for light trucks in model years 2029-31. The final HDPUV fuel efficiency standards increase at a rate of 10 percent per year in MYs 2030-2032 and 8 percent per year in MYs 2033-2035.[1]

[1] NHTSA, CAFE Standards, https://www.nhtsa.gov/laws-regulations/corporate-average-fuel-economy, accessed April 2025.

3) National Energy Conservation Policy Act

Signed into law in 1978, the National Energy Conservation Policy Act (NECPA) established a federal program consisting of test procedures, labeling, and energy targets for consumer products. EPCA was amended in 1979 and directed the Department of Energy (DOE) to establish energy conservation standards for consumer products. It has been regularly updated and amended by subsequent laws and regulations. NECPA established energy-efficiency standards for consumer products and includes a residential program for low-income weatherization assistance, grants and loan guarantees for energy conservation in schools and hospitals, and energy-efficiency standards for new construction.

4) National Energy Policy Act of 1992 (EPACT)

EPACT calls for programs that promote efficiency and the use of alternative fuels. EPACT requires certain federal, state, and local government and private fleets to purchase a percentage of light duty alternative fuel vehicles (AFV) capable of running on alternative fuels each year. In addition, EPACT set financial incentives by allowing federal tax deductions for businesses and individuals to cover the incremental cost of AFVs. The Act also requires states to consider a variety of incentive programs to help promote AFVs.

5) National Energy Policy Act of 2005 (EPACT 2005)

The National Energy Policy Act of 2005 addresses energy production in the United States, including: (1) energy efficiency; (2) renewable energy; (3) oil and gas; (4) coal; (5) Tribal energy; (6) nuclear matters and security; (7) vehicles and motor fuels, including ethanol; (8) hydrogen; (9) electricity; (10) energy tax incentives; (11) hydropower and geothermal energy; and (12) climate change technology. The National Energy Policy Act provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

6) Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) was enacted to facilitate the move toward national energy independence and security, to increase the production of clean renewable fuels, to protect consumers, to increase the efficiency of products, buildings, and vehicles, to promote research on and deploy greenhouse gas capture and storage options, and to improve the energy performance of the Federal Government. The three key provisions of the EISA include increasing the Corporate Average Fuel Economy Standards (CAFE) standards, enacting the Renewable Fuel Standard (RSF), and establishing appliance/lighting energy efficiency standards.

b) State

1) Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code (PRC) Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the State's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the State's economy; and protect public health and safety (PRC Section 25301[a]). The 2020 Integrated Energy Policy Report, the latest published report from CEC, provides the results of the CEC's assessments related to energy sector trends, building decarbonization and energy efficiency, zero-emission vehicles (ZEV), energy equity, climate change adaptation, electricity reliability in Southern California, natural gas assessment, and electricity, natural gas, and transportation energy demand forecasts.

2) Renewables Portfolio Standards

First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.[2] SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent and (2) to double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, former Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly-owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100-percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[3]

[2] California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018.
[3] California Public Utilities Commission, RPS Program Overview, 2018.

In March 2021, the CEC, CPUC, and CARB issued an SB 100 Joint Agency Report that assesses barriers and opportunities to implementing the 100-percent clean electricity policy.[4] The report's initial findings suggest that the goals of SB 100 are achievable, though opportunities remain to reduce overall system costs; however, the report also notes that the findings are intended to inform state planning and are not intended as a comprehensive or prescriptive roadmap to 2045, and future work is needed on critical topics, such as system reliability and land use, and further addresses energy equity and workforce needs.[5]

3) California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023. The 2022 Title 24 standards continue to improve upon the preceding versions of Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings, which encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality.[6]

4) California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.[7] The 2022 CALGreen Code improves upon the preceding versions of the CALGreen Code by simplifying the code and its application by offering choices related to new voluntary measures to builders, including battery storage systems, electric heat pump space, and water heating that encourage building electrification. The 2022 CALGreen Code went into effect on January 1, 2023.

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4 California Energy Commission, California Public Utilities Commission, California Air Resources Board, 2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment, CEC-200-2021-001, March 2021.

5 California Energy Commission, California Public Utilities Commission, California Air Resources Board, 2021 SB 100 Joint Agency Report Achieving 100 Percent Clean Electricity in California: An Initial Assessment, CEC-200-2021-001, March 2021.

6 California Energy Commission, 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2022.

7 California Building Standards Commission, Guide to the 2022 California Green Building Standards Code Nonresidential, 2022.

5) California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO2) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set GHG emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards for model years 2017-2025.[8,9] In March 2020, the NHTSA and the USEPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe CO_2 emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.

6) California Air Resources Board

i) Scoping Plan

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (Health and Safety Code [HSC] Section 38561 (h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[10] The 2008 Climate Change Scoping Plan had a range of GHG reduction actions, which included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

The 2008 Climate Change Scoping Plan called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the RPS.[11] Additionally, the 2008 Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicates that

8 California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493.
9 United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, 2012.
10 California Air Resources Board, Climate Change Scoping Plan, 2008.
11 For a discussion of Renewables Portfolio Standard, refer to subsection California Renewable Portfolio Standard.

substantial savings of electricity and natural gas will be accomplished through "improving energy efficiency by 25 percent."

The 2008 Climate Change Scoping Plan identified several specific issues relevant to development projects, including:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

  A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The Climate Change Scoping Plan notes that water use requires significant amounts of energy, including approximately one-fifth of Statewide electricity.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

The latest update is the 2022 Scoping Plan, which is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[12] Measures to reduce GHG emissions include building decarbonization, energy efficiency improvements and transportation electrification.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

[12] CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

ii) Advanced Clean Car Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.[13] The program requires a greater number of zero-emissions vehicle (ZEV) models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles and the ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

iii) Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 California Code of Regulations [CCR] Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

iv) In-Use Off-Road Diesel Fueled Fleets Regulation

Because off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the “In-Use Off-Road Diesel Fueled Fleets Regulation” to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2023, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines beginning January 1, 2024. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2024 through 2028, medium fleets each

[13] California Air Resources Board, Clean Car Standards – Pavley, Assembly Bill 1493, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program, accessed January 2025.

year from 2016 through 2030, and small fleets each year from 2028 through 2032. While the goal of this regulation is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from the use of more fuel-efficient engines.

v) SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent was to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) reflects CARB's updated SB 375 targets for the SCAG region, requiring a 19-pecent decrease in VMT by 2035.

c) Regional

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

SB 375 requires each MPO to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and, thereby, reduce GHG emissions from these sources. For the SCAG region, the 2020-2045 RTP/SCS, adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016-2040 RTP/SCS.

The 2020-2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. The 2020-2045 RTP/SCS projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of 8 percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008, 2012, and 2016 RTP/SCS plans, the 2020-2045 RTP/SCS includes a "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets.

The most recent RTP/SCS was updated and approved by SCAG's Regional Council in April 2024 (2024-2050 RTP/SCS). However, CARB has not yet approved the 2024-2050 RTP/SCS; therefore, the analysis in this Draft EIR relies on the 2020-2045 RTP/SCS. Nevertheless, a consistency analysis with the 2024-2050 RTP/SCS is provided for informational purposes to show that the Proposed Project would also not conflict with its goals and policies.

SCAG's 2024-2050 RTP/SCS introduces Priority Development Areas (PDAs) as areas within the SCAG region where future growth can be located to help the region reach the 2024-2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. The more compact form of regional development implemented through PDAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. As a general principle, development in overlapping PDAs indicates a greater alignment with the 2024-2050 RTP/SCS goals.

d) Santa Monica College

1) SMC Climate Change and Sustainability Policy Goals

In 2018, and again in 2020, SMC's President/ Superintendent, Dr. Kathryn Jeffery, re-affirmed SMC's commitment to supporting climate change and sustainability goals. SMC joined 1,500+ cities, businesses, universities, investors, and other organizations calling to: "Drive economic growth across every sector of the economy through job-creating sustainable investments; expand U.S. leadership at home and abroad; and reimagine community partnership to advance just and equitable climate solutions and build resilience to climate change."

In January 2020, SMC's Board of Trustees adopted the following Climate Change and Sustainability Policy Goals:

Goal	2025	2030
Reduction of greenhouse gas emissions to below 1990 levels	30%	40%
Increase of renewable energy consumption	25%	50%
Of fleet vehicles are zero-emission vehicles	25%	50%
Of all new buildings and major renovations will be constructed as Zero Net Energy	50%	100%
Of all new buildings and major renovations will achieve at least a Leadership in Energy and Environmental Design (LEED) "Silver" or equivalent rating	50%	100%
Increase in the procurement of sustainable products and services compared to current levels	20%	25%
Reduction of municipal solid waste compared to current levels	20%	25%
Source: Santa Monica College, SMC Community, Sustainability, Policies and Programs, https://www.smc.edu/community/sustainability/policies-programs.php, accessed January 2025.		

2) Green Building Administration Regulation

As directed by the District's Board of Trustees, at least half of all new buildings that are at least half funded with Proposition A/AA Bond monies are required be ”green” buildings, built to LEED Silver certification standards, or equivalent.

2. Existing Conditions

a) Energy Profile

1) Electricity

The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W) while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep the bulb on for 1 hour would be 100 Wh. If ten 100 W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million watts, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion watt-hours.

The Southern California Edison (SCE) power system provided electrical power and service to the City of Santa Monica. SCE provides electricity to approximately 15 million people, 180 incorporated cities, 15 counties, throughout its 50,000-square-mile service area across central, coastal and southern California.[14] In 2024, SCE’s power system experienced a peak demand of 23,861 MW. The annual electricity sale to customers in 2024 was approximately 81,841 MWh.[15]

In May of 2019 Clean Power Alliance (CPA) became the new electricity supplier for non-residential customers in the City of Santa Monica. The CPA purchases electricity from renewable sources and partners with SCE to distribute electricity to residential and commercial customers throughout the City. CPA is a Joint Powers Authority (JPA) made up of public agencies across Los Angeles

[14] Southern California Edison, 2024. About Us, Who We Are, https://www.sce.com/about-us/who-we-are, accessed January 2025.

[15] Edison International and Southern California Edison, 2024. SCE 2024 Annual Report. Available: https://download.edison.com/406/files/202503/2024-eix-sce-annual-report.pdf?Signature=p2lfYDB4wm%2FK1FfOtmYAMaVuunE%3D&Expires=1745003423&AWSAccessKeyId=AKIATACLJRQCT2IBV7MN&versionId=YQ673zWLjkjHqy9XRuAsTjNV9laBKFsA&response-content-disposition=attachment, accessed April 2025.

and Ventura counties working together to bring clean, renewable power to Southern California. With the recent switch in energy providers, electricity customers in Santa Monica are automatically defaulted to have 100% renewable energy serving their electricity needs. CPA produces electricity from renewable energy sources, and SCE delivers it to homes and businesses and provides the same maintenance and other repair services. As noted in CPA's most recent Integrated Resource Plan, CPA has a clear plan to meet its California Energy Commission 2021 Integrated Energy Policy Report (CEC 2021 IEPR) load forecast through 2035 with a reliable resource portfolio comprised of carbon free energy and RPS-eligible energy resources.[16]

2) Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of hundred cubic feet (ccf).

The Southern California Gas Company (SoCalGas), a subsidiary of Sempra Energy (the nation's largest natural gas supplier), provides natural gas to the City of Santa Monica through existing gas mains located under the streets. Natural gas service is provided in accordance with the SoCalGas' policies and extension rules on file with the CPUC at the time contractual agreements are made. The availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.[17]

SoCalGas, along with five other California utility providers, released the 2024 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2040.[18] The 2024 California Gas Report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.

[16] Clean Power Alliance, CPA 2022 Integrated Resource Plan, November 1, 2022, https://files.cleanpoweralliance.org/uploads/2022/11/cpasc_narrative_public.pdf, accessed May 2025.

[17] Although the Proposed Project's buildout year is estimated for 2043, this section compares natural gas projections to the year 2040, which is the last available projected year provided in the 2024 California Gas Report.

[18] California Gas and Electric Utilities, 2024 California Gas Report, 2024.

In 2023, gas supplies available to SoCalGas from California sources averaged 84 million cubic feet per day (cf/day).[19] Based on the 2024 California Gas Report, SoCalGas projects total natural gas demand to decrease at an annual rate of 0.7 percent per year from 2024 to 2040. Factors that contribute to the overall downward trend are standards created by Title 20 and 24 Codes and Standards and renewable energy goals that impact gas-fired electricity. Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas' long-term projection for natural gas also decreases. SoCalGas' storage fields attain a combined theoretical storage working inventory capacity of 119.5 billion cf.[20] Based on the 2024 California Gas Report (Table 37 and 38), the CEC estimates that current natural gas consumption within the SoCalGas' planning area is 2,307 million cf/day in 2024 and will be approximately 2,055 million cf/day in 2040.[21]

3) Transportation Energy

Different types of energy sources, or fuels, are used for transportation in the U.S., which include petroleum products (e.g., gasoline, diesel, jet fuel, residual fuel oil, and propane), biofuels (e.g., ethanol and biodiesel), natural gas, and electricity. Petroleum-based fuels account for about 90 percent of California's transportation energy sources. Gasoline remains the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. The transportation sector generates the most GHG emissions and uses the most energy in California. In recognition of these challenges, California has been enacting policies and goals to shift the transportation sectors toward cleaner, sustainable fuels and more efficient technology vehicles.

3. SMC Main Campus

The SMC Main Campus is currently developed with 1,065,931 square feet of existing gross floor area and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. Additionally, there are two ongoing building projects on the Project Site currently under construction. These active projects include a new Math and Science building, which is expected to open by late 2024 and the new Art Replacement building, which is expected to open by late 2025. This analysis assumes a 2025 baseline for existing uses on the Project Site, which includes completion and full buildout of these two ongoing projects.

The SMC Main Campus incorporates several energy efficiency projects and infrastructure systems including on-site energy production (i.e., solar photovoltaic panels), Electric Vehicle Charging Station (EVSE) infrastructure, a Central Plant, energy efficient lighting fixtures, and energy efficient buildings.

[19] California Gas and Electric Utilities, 2024 California Gas Report, 2024, at page 119.
[20] California Gas and Electric Utilities, 2024 California Gas Report, 2024, at page 126.
[21] California Gas and Electric Utilities, 2024 California Gas Report, 2024, at pages 164 and 165.

a) Solar Energy

Energy demand at SMC's Main Campus is supported by 779 KW of photovoltaic electricity panels incorporated into various structures on the campus including Parking Structures 3 and 4, the Library Building, the Sustainability Center, the Center for Media and Design, and the Student Services Center Building. In the middle of the day the Student Services Center Building produces 75% of its own electricity using solar. The solar voltaic panels generate over 50,660 kWh per month.[22]

b) EV Charging Stations

There are 18 Electric Vehicle Charging Stations (EVCS) within SMC's Main Campus to support electric and electric-hybrid fuel vehicles. Six level II charging stations are located in the Student Services Center parking garage on the first floor and there are six additional EVCS on each of the two floors below grade. Additionally, there are 29 EV-reserved parking spaces within SMC's Main Campus. There are 21 parking spaces designated for EVs and ZEVs for staging before and after charging in the Student Services Center parking garage and another 8 EV spaces are located on the bottom level of the Lot 3 parking garage.

c) LEED Building Certifications

Several buildings on the SMC Main Campus have been built to or renovated to achieve LEED energy efficiency standard ratings. The Student Services Building is designed under USGBC NC v3 and is seeking a LEED Platinum certification. The CORE Performance Center is designed under USGBC NC v3 and is certified LEED Platinum. The CORE performance building is designed with a central plant to freeze liquid in off-peak hours and then use the chilled water as refrigerant during the day to provide cooling to all buildings on the Main Campus. The system provides energy efficiency by centrally cooling, using off-peak electricity, and by replacing harmful chlorofluorocarbons (CFS) with chilled water as a refrigerant. The Information Technology Media Center Building been designed under USGBC NC v3 and has a LEED Silver Certification. The Humanities and Social Science Building is certified LEED Silver. The Math and Science Center Building currently under construction is targeted for LEED Gold certification.

d) Energy Demands

1) Electricity

The existing electricity demand for the SMC Main College Campus was calculated in CalEEMod based on the existing developed floor area of the current buildings and operations on campus.

[22] Chevron Energy Solutions, 2010. https://www.prnewswire.com/news-releases/santa-monica-college-and-chevron-energy-solutions-announce-completion-of-energy-efficiency-and-solar-project-105781568.html

The SMC Main Campus is currently developed with 1,065,931 gsf of instructional and administrative floor area and has a total of 2,858 parking spaces in above grade and below grade parking structures. As shown in Table IV.D-1, Estimated Existing Electricity Demand, it is estimated that existing uses on the Project Site currently consume approximately 15,878,885 kilowatt hours (kWh) of electricity per year.

Table IV.D-1
Estimated Existing Electricity Demand

Land Use	Size	Total Electricity Demand (kWh/year) [a]
Community College (2 yr)	1,065,931 sf	11,655,887
Parking Structure(s)	2,858 spaces	4,222,998
Total Existing Electricity Demand		**15,878,885**

Notes:
sf =square feet; kWh = kilowatt-hour
Source: SCAQMD, CalEEMod Version 2022.1.1.29. See Appendix C to this Draft EIR.

2) Existing Natural Gas Demand

The total existing natural gas demand for the SMC Main Campus was calculated in CalEEMod based on the existing developed floor area of the current buildings and operations on campus. As shown in Table IV.D-2, Estimated Existing Natural Gas Demand, existing natural gas demand on the Project Site is estimated to be approximately 512,520 hundred cubic feet per year (ccf/yr).

Table IV.D-2
Estimated Existing Natural Gas Demand

Land Use	Size	Total Natural Gas Demand (kBTU/year)	Total Natural Gas Demand (ccf/year) [a]
Community College (2 yr)	1,065,931 sf	53,097,097	512,520
Total Existing Natural Gas Demand		**53,097,097**	**512,520**

Notes:
sf =square feet; kBTU = one thousand British thermal units; ccf = one hundred cubic feet
[a] The CalEEMod worksheets provide natural gas in one thousand British Thermal Units (kBTU). 100 cubic feet (ccf) of natural gas is equivalent to 103,600 kBTU.
Source: SCAQMD, CalEEMod Version 2022.1.1.29. See Appendix C to this Draft EIR.

3) Transportation

SMC's Main Campus generates a demand for transportation energy as a result of the vehicle trips traveling to and from the campus by employees, faculty, visitors, and vendors. The total existing demand for transportation-related fuels associated with the SMC Main Campus was calculated based on the existing trip generation and vehicle miles traveled (VMT) factors generated by the

CalEEMod program and fuel consumption factors based on the EMFAC2021 Emissions Inventory. As estimated in Table IV.D-3, below, SMC's Main Campus generates a demand of 1,890,700 gallons of petroleum-based fuel per year including 216,411 gallons per year (gpy) of diesel fuel and 1,674,289 gpy of gasoline fuel.

Table IV.D-3
Estimated Existing Transportation Fuel Use

Fuel Type	Fleet Factor (% of total)	Annual VMTs (miles) [b]	Fuel Rate (mpg) [c]	Total Fuel Demand (gallons/year)
Diesel	4	1,856,805	8.58	216,411
Gas	91	42,242,320	25.23	1,674,289
TOTALS:	***95% [a]***	***44,099,125***	--	***1,890,700***

Notes:
VMTs = vehicle miles traveled; mpg = miles per gallon
[a] *The remaining 5% of fleet factor includes electric and natural gas vehicles.*
[b] *Total Annual VMTs from Operational Mobile Sources are based on the CalEEMod worksheets provided in Appendix C to this Draft EIR.*
[c] *Fuel rates are based on EMFAC2021 (v1.0.2) Emissions Inventory, 2025 Calendar Year (See Appendix E, Energy Calculations worksheets).*

C. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact on energy if it would:

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

Threshold (b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.**

With regard to Threshold (a), above, the following analysis relies upon the guidance contained in Appendix F of the CEQA Guidelines. Appendix F of the CEQA Guidelines mandates that EIRs include a discussion of the potential energy impacts of a proposed project, with a particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F cites the following factors to be considered in determining whether the Proposed Project would have a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources:

1) The Proposed Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Proposed Project's life cycle including construction,

operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2) The effects of the Proposed Project on local and regional energy supplies and on requirements for additional capacity.
3) The effects of the Proposed Project on peak and base period demands for electricity and other forms of energy.
4) The degree to which the Proposed Project complies with existing energy standards.
5) The effects of the Proposed Project on energy resources.
6) The Proposed Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

With regard to Threshold (b), the Proposed Project has been evaluated for consistency with adopted energy conservation plans and policies that are applicable to the Proposed Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CALGreen Code, and SMC's Board of Trustees Climate Change and Sustainability Policy Goals. Additionally, the energy plan consistency analysis addresses the Proposed Project's consistency with SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS, which include regional planning goals to reduce regional VMT and corresponding decrease in fuel consumption.

D. Methodology

1. Construction

A quantitative assessment of the Proposed Project's electricity, diesel, and petroleum-based fuel (i.e., gasoline and diesel fuel) use during construction has been provided to estimate the Proposed Project's energy use during the proposed construction activities. The Proposed Project's construction activities would generate an increased indirect demand for electricity use for the treatment and conveyance of water applied for dust suppression activities during the site clearing and excavation/grading phases and electricity to power construction equipment.

No natural gas consumption would occur during the construction period as no construction equipment using natural gas as a fuel source would be used.

Non-renewable resources, such as petroleum-based diesel and gasoline fuels, would be consumed to power heavy construction equipment and motor vehicles associated with construction workers, vendors, and haul trucks traveling to and from the Proposed Project area. To calculate the amount of gasoline and diesel fuel consumed during construction, the equipment usage, horsepower, load factors, and fuel rates from the construction phases and activities calculated in the California Emissions Estimator Model (CalEEMod, Version 2022.1.1.29) program were utilized. Fuel consumption was calculated based on EMFAC2021 (v1.0.2) emission factors. Consistent with the CalEEMod program, construction worker trips were assumed to use gasoline vehicles, and construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. The calculation worksheets are provided in Appendix E, Energy Calculation

Worksheets, to this Draft EIR.

2. Operation

The amount of electricity and natural gas usage for the existing baseline conditions and Proposed Project operations have been estimated using the electricity generation rates and natural gas usage rates provided in the CalEEMod program. For the existing uses, the CalEEMod program was based on historic Title 24 building energy conservation standards to account for the fact that the existing structures within the Proposed Project area were built prior to the current Title 24 Standards. The CalEEMod program's default energy calculations are based on the 2019 Title 24 Standards. The Proposed Project's buildout is anticipated in 2035; therefore, the Proposed Project would be subject to future Title 24 Standards (2022 year or later). As a conservative analysis, the Proposed Project's operational emissions were estimated to account for 2022 Title 24 Standards, which are estimated to be 10 percent more efficient than the 2019 Title 24 Standards.

Additionally, certain requirements under the Climate Change and Sustainability Policy Goals adopted by SMC's Board of Trustees, such as providing on-site renewable energy production, all-electric buildings, low water technologies, and optimized energy performing fixtures were factored into the modeling assumptions. The Proposed Project's estimated electricity and natural gas demands were analyzed relative to SCE's and SoCalGas' existing and planned energy supplies to determine if these two energy utility companies would be able to meet the Proposed Project area's electricity and natural gas demands.

Transportation energy demands during Proposed Project operations were based on an estimate of petroleum-based diesel and gasoline fuel use during the operational phase. Fuel usage was calculated based on the Proposed Project's total VMTs as calculated in the CalEEMod program and fuel efficiency factors estimated by CARB's EMFAC2021 program.

E. Project Impacts

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?

1. Impact Analysis

The following analysis addresses the six CEQA Guidelines Appendix F factors previously identified in the Thresholds of Significance subsection above to determine whether Threshold (a) would be exceeded.

Appendix F Factor (1) The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project's life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

a) Construction

Construction of the Proposed Project would generate an increased demand for energy in the form of electricity associated with the treatment and conveyance of water used for dust control, and transportation fuels (i.e., gasoline and diesel fuel) associated with off-road heavy duty construction equipment, haul trips, and workers and vendors commuting to the Project Site. Construction equipment and construction activities typically do not consume natural gas. Therefore, a majority of energy used for the construction process is transportation energy, such as diesel fuel and gasoline fuel, and electricity, which are discussed below. It is anticipated that full buildout of the Proposed Project would occur over a 10-year period with an anticipated start of construction in 2025 and final buildout occurring in year 2035. This environmental analysis assumes a construction schedule of 10 years for full buildout (four years for Phase 1, three years for Phase 2, and three years for Phase 3). As such, the energy demands at buildout of each phase of the Proposed Project are presented below.

1) Electricity

The Proposed Project's construction activities would increase the demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the site clearing and excavation/grading subphases during all three construction endpoints. Although this demand is generated offsite and associated with system infrastructure, it is estimated that the Proposed Project's use of watering the Project Site would generate a demand of 11,565 kWh of electricity from all three phases of construction. Additionally, electricity would be required for the use and operation of a temporary construction office throughout the duration of the construction process. Based on an assumed energy demand of 37.5 kWh/day[23], the operation of an on-site portable contractor office would generate a total demand of 137,605 kWh over an approximate 10-year construction period. As summarized in Table IV.D-4, below, the total electricity demand for Proposed Project construction is estimated to be 149,160 kWh.

[23] Electricity demand is based on a portable construction office equipped to support 12 people including computers and phone, large monitors, Wi-Fi, LED lighting, temperature control, a refrigerator, microwave, and a tankless water heater. source: https://www.craftsmenind.com/net-zero-trailers, accessed May 2025.

Table IV.D-4
Maximum Daily Electricity Demand During Construction

Activity/Use	Total Electricity Demand (kWh)
Water Use (dust suppression)	11,565
Construction Office/Trailer	137,605
Total Electricity Demand	**149,160**

Notes:
kWh = kilowatt-hour
Source: SCAQMD, CalEEMod Version 2022.1.1.29, See Appendix C to this Draft EIR.
Parker Environmental Consultants, 2025.

Electricity use from construction would be short-term and would represent a small fraction of the net annual operational electricity demand of the existing uses. Although the electricity demands from construction power tools is too speculative to quantify, the availability and use of on-site power connections at the construction site(s) would reduce demands for gasoline or diesel-powered generators. It is assumed that electricity from on-campus power outlets and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction. 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. 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.

2) Natural Gas

As stated above, construction activities typically do not involve the consumption of natural gas. Thus, there would be no expected demand generated by construction of the Proposed Project. As such, the energy requirements and energy use at the Project Site related to natural gas during construction would not be wasteful, inefficient, or unnecessary and there would be no impact.

3) Transportation Fuels

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). Heavy equipment involved in the construction phases of the Proposed Project would include concrete/industrial saws, excavators, bulldozers, tractors, loaders, backhoes, graders, aerial lifts, air compressors, cement mixer trucks, cranes, generator sets, pumps, welders, scrapers, forklifts, rollers, and pavers. In addition, haul trucks would be used to transport excavated earth and building material to material recycling centers and area landfills. As shown in Table IV.D-5, below,

construction of the Proposed Project would consume a total of 330,857 gallons of transportation fuel, including 238,100 gallons of diesel and 92,757 gallons of gasoline during all three construction phases.

Table IV.D-5
Summary of Transportation Energy Demand During Construction

Fuel Type	Quantity [a]	
	Gasoline (gallons)	**Diesel** (gallons)
Phase 1 Construction		
On-Road Vehicles (Workers Trips)	55,166	--
On Road Construction Equipment (Vendors/Deliveries/Hauling)	--	38,559
Off-Road Construction Equipment	--	72,248
Phase 2 Construction		
On-Road Vehicles (Workers Trips)	32,252	--
On Road Construction Equipment (Vendors/Deliveries/Hauling)	--	23,919
Off-Road Construction Equipment	--	46,588
Phase 3 Construction		
On-Road Vehicles (Workers Trips)	5,339	--
On Road Construction Equipment (Vendors/Deliveries/Hauling)	--	10,416
Off-Road Construction Equipment	--	46,370
Subtotal	***92,757***	***238,100***
Total Transportation Fuel Use	**330,857**	

[a] Calculations provided in Appendix E, Energy Calculation Worksheets, to this Draft EIR.
Source: Parker Environmental Consultants, 2025.

The estimated transportation energy is based on a conservative set of assumptions. The construction energy analysis assumes a majority of equipment would be operating continuously (8 hours per day) throughout the entire duration of construction. However, under real world typical conditions, most equipment would be operating less than 8 hours per day. Additionally, trucks and equipment used during construction would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. Off-Road regulation requires fleets to reduce their emissions by retiring older vehicles and replacing the retired vehicles with newer vehicles, repowering older engines, or installing verified diesel emission control strategies in older engines; and by restricting the addition of older vehicles to fleets. Thus, later phases of construction would utilize a more efficient fleet of off-road equipment. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements, which will increase fuel efficiency 10 percent annually for model year 2026 and beyond. As such, fuel efficiency for on-road vehicles would improve over time. Therefore, the Proposed Project's construction activities would comply with existing energy standards with regard to transportation fuel consumption and would not cause wasteful, inefficient, and unnecessary use of energy.

b) 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 Proposed Project's operational energy demands for electricity, natural gas, and petroleum-based transportation fuel is discussed in further detail below.

1) Electricity Use

As discussed above, 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 SCE and CPA grid. Thus, new buildings constructed as part of the Master Plan Update would be able to connect to and be served by the existing power sources on campus. The total electricity demand from the Proposed Project at full buildout (inclusive of Phases 1, 2 and 3) is estimated to be approximately 14,427,048 kWh/year. As shown in Table IV.D-6, below, after accounting for the reduction in energy use associated with the demolition of existing buildings within the Main Campus, the Proposed Project's net electricity demand would result in an overall decrease of approximately 1,451,837 kWh/year.

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, at least half of all new buildings would be required to meet the LEED "Silver" rating or higher, which would further reduce overall electricity usage. Additionally, as discussed above, the Proposed Project's electricity is supplied in part by the 779 KW of photovoltaic electricity panels incorporated into various structures on the campus. Any additional electricity demands are purchased from the Clean Power Alliance, which procures 100 percent of its energy portfolio from renewable sources. This represents the available on-site and off-site renewable sources of energy that could meet the Proposed Project's future energy demand. As such, the energy requirements and energy use of the Proposed Project related to electricity during operation would not cause wasteful, inefficient, and unnecessary use of electric energy, and impacts would be less than significant.

Table IV.D-6
Proposed Project's Estimated Electricity Demand at Full Buildout

Land Use	Size	Total Electricity Demand (kWh/year) [a]
Existing Conditions		
Community College (2 yr)	1,065,931 gsf	11,655,887
Parking Structure(s)	2,858 spaces	4,222,998
Total Existing Electricity Demand		**15,878,885**
Proposed Project		
Community College (2 yr)	971,047 gsf	10,204,050
Parking Structure(s)	2,858 spaces	4,222,998
Total Proposed Electricity Demand		**14,427,048**
Net Electricity Demand:		**(1,451,837)**

Notes: gsf = gross square feet; kWh = kilowatt-hour
[a] *SCAQMD, CalEEMod Version 2022.1.1.29, See Appendix C to this Draft EIR.*
Source: Parker Environmental Consultants, 2025.

2) Natural Gas Use

Based on SMC's Board of Trustees Climate Change and Sustainability Policy Goals, the Main Campus will be phasing out the use of natural gas use in all new buildings. As such, this analysis assumes the Proposed Project would result in an overall decrease in natural gas demands, since demolition and renovation of existing land uses would occur, which are anticipated to contain natural gas infrastructure. As shown in Table IV.D-7, below, after accounting for the reduction in natural gas demands associated with the demolition of existing land uses, the Proposed Project's net natural gas demands would result in a net decrease of approximately 79,161 ccf/year.

The Proposed Project would promote energy conservation in accordance with the policies identified in the 2022 Title 24 Standards and CalGreen. Furthermore, the Proposed Project would comply with the Board of Trustees' programs and policies of phasing out natural gas in all new buildings on campus. As such, the energy requirements and energy use of the Proposed Project related to natural gas during operation would not cause wasteful, inefficient, and unnecessary use of natural gas energy, and impacts would be less than significant.

Table IV.D-7
Proposed Project's Estimated Net Natural Gas Demand at Full Buildout

Land Use	Size	Total Natural Gas Demand (kBTU/year)	Total Natural Gas Demand (ccf/year) [a]
Existing Conditions			
Community College (2 yr)	1,065,931 gsf	53,097,097	512,520
Total Existing Natural Gas Demand:		**53,097,097**	**512,520**
Proposed Project			
Community College (2 yr)	971,047 gsf	44,895,951	433,359
Total Project Natural Gas Demand:		**44,895,951**	**433,359**
Net Natural Gas Demand:		**(8,201,146)**	**(79,161)**

Notes:
gsf = gross square feet; kBTU = one thousand British thermal units; ccf = one hundred cubic feet
[a] The CalEEMod worksheets provide natural gas in one thousand British Thermal Units (kBTU). 100 cubic feet (ccf) of natural gas is equivalent to 103,600 kBTU.
Source: SCAQMD, CalEEMod Version 2022.1.1.29. See Appendix C to this Draft EIR.

3) Transportation Energy Consumption

Operation of the Proposed Project would continue to generate a demand for transportation energy as a result of the vehicle trips traveling to and from the campus by employees, faculty, students, visitors, and vendors. However, the Proposed Project would result in a net decrease of 94,884 gsf of building floor area and would maintain the existing supply of 2,860 parking spaces. As such, it is anticipated that the Proposed Project would result in a net decrease in transportation fuel. As summarized in Table IV.D-8, below, the Proposed Project would generate a total demand of 1,418,603 gallons of petroleum-based fuel per year including 182,867 gpy of diesel fuel and 1,235,736 gpy of gasoline fuel. Compared to existing conditions, this would result in a net decrease in operational transportation fuel.

Table IV.D-8
Proposed Project's Estimated Transportation Energy Consumption at Full Buildout

Fuel Type	Fleet Factor (% of total)	Annual VMTs (miles) [b]	Fuel Rate (mpg) [c]	Total Fuel Demand (gallons/year)
Existing Conditions				
Diesel	4	1,856,805	8.58	216,411
Gas	91	42,242,320	25.23	1,674,289
Total	***95% [a]***	***44,099,125***	--	***1,890,700***
Proposed Project				
Diesel	4	1,691,522	9.25	182,867
Gas	86	36,367,713	29.43	1,235,736
Total	***90% [a]***	***38,059,235***	--	***1,418,603***
		Net Transportation Fuel Demand	*Diesel*	*-33,544*
			Gas	*-438,553*
			Total	***-472,097***

Notes:
VMTs = vehicle miles traveled; mpg = miles per gallon
[a] *The remaining fleet factor includes electric and natural gas vehicles.*
[b] *Total Annual VMTs from Operational Mobile Sources are based on the CalEEMod worksheets provided in Appendix C to this Draft EIR.*
[c] *Fuel rates are based on EMFAC2021 (v1.0.2) Emissions Inventory, 2035 Calendar Year (See Appendix E, Energy Calculations Worksheets).*

SMC's Main Campus is supported by an extensive network of bus and light rail connections and is served by bus lines operated by the City of Santa Monica's Big Blue Bus. Ridership for SMC students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro. These programs, which serve to reduce the Proposed Project's operational VMT, are anticipated to continue under the Proposed Project. Furthermore, the use of petroleum based fossil fuel is expected to decrease in future years as the use of alternative fueled vehicles increases. As shown in Table IV.D-8, based on the EMFAC2017 emission factors, the regional petroleum based fleet mix is anticipated to decrease by another 5 percent from 2025 to 2035. The 18 EVCSs and 29 EV-reserved parking spaces within SMC's Main Campus would continue to support the regions transition to electric and electric-hybrid fuel vehicles, further reducing the Proposed Project's demand for petroleum based fuels. As such, the demand for petroleum-based fuel usage during Proposed Project operation would not cause wasteful, inefficient, and unnecessary use of transportation energy, and impacts would be less than significant.

Appendix F Factor (2): The effects of the Project on local and regional energy supplies and on requirements for additional capacity.

1) Electricity

As estimated in Table IV.D-6, above, the Proposed Project's total electricity demand at full buildout is estimated to be approximately 15,100,359 kWh/year. After accounting for the reduction in energy use associated with the demolition of existing buildings within the Main Campus, the Proposed Project's net electricity demand would result in an overall decrease of approximately 778,526 kWh/year. As noted in the Environmental Setting subsection above, the Main Campus's electricity demand is currently supplied by 779 KW of photovoltaic electricity panels incorporated into various structures on the campus, with any surplus demands being augmented by connections to the SCE power grid, with energy purchased through the CPA. The existing onsite photovoltaic electricity panels would continue to serve the Proposed Project's energy demands, and the Proposed Project's demand for augmented power from regional energy supplies would be reduced. Additionally, new photovoltaic electricity panels would be incorporated into the proposed new buildings. As the future electric energy demand are anticipated to be reduced under the Proposed Project, impacts of the Proposed Project on local and regional electricity energy supplies would be less than significant.

2) Natural Gas

As shown in Table IV.D-7, above, the Proposed Project's natural gas demands would be 466,898 ccf/yr, which would result in a net decrease of approximately 45,622 ccf/year as compared to existing conditions. The net reduction in natural gas demand is due to a direct decrease in building area, and the result of decommissioning older less energy efficient buildings and replacing them with newer building systems that are compliant with Title 24 Standards and the Cal Green Code. Furthermore, the Proposed Project's commitment to LEED Silver certification would further reduce the Proposed Project's natural gas demands. Therefore, the Proposed Project would not adversely affect local and regional natural gas supplies or generate a demand for additional capacity during construction or operation. Therefore, impacts on local and regional natural gas energy supplies would be less than significant.

3) Transportation Energy

As summarized in Table IV.D-8, above, the Proposed Project would generate a net decrease in demand for petroleum-based transportation fuel. The Proposed Project's demand for petroleum-based fuel is anticipated to decrease by 472,097 gpy, with a net reduction of 33,544 gpy of diesel fuel and 438,553 gpy of gasoline fuel as compared to existing conditions. Thus, as the Proposed Project would result in a net decrease in demand for petroleum-based fuels, impacts on local and regional petroleum-based transportation fuel supplies would be less than significant.

Appendix F Factor (3): The effects of the Project on peak and base period demands for electricity and other forms of energy.

As discussed above, the electricity demand, natural gas consumption, and transportation energy consumption would be well within the available regional supplies and overall capacity of SCE, CPA, SoCalGas, and California refineries, respectively. The Proposed Project's energy demand and consumption are negligible compared to available supplies during both construction and operation.

With regard to peak electricity load conditions, the Proposed Project would reduce overall electricity demands compared to existing conditions. The CPA and SCE would continue to provide electricity from renewable energy sources. Furthermore, in accordance with SMC's Environmental Sustainability policies, at least half of all newly constructed buildings would be required to meet the LEED "Silver" rating or higher, which would further reduce overall electricity demands. Thus, the Proposed Project would have a minimal impact to the local utility providers, and the Proposed Project would not result in an increase in demand for electricity that would impact peak load conditions. Therefore, the Proposed Project's electricity demand would have a negligible effect on peak and base load conditions of the power grid.

With regard to peak day natural gas demand, the Proposed Project would reduce overall natural gas demands compared to existing conditions, since all new buildings would eliminate natural gas infrastructure. Therefore, Proposed Project natural gas demand during operational activities would have a negligible effect on peak demands of the natural gas supplies.

The electricity and natural gas energy supplies would be sufficient to serve the Proposed Project's peak energy demand. Thus, the Proposed Project's electricity and natural gas demand during operational activities would have a negligible effect on demand during peak and base load periods of the power grid and on the natural gas supplies, and impacts would be less than significant.

Appendix F Factor (4): The degree to which the Project complies with existing energy standards.

1) Construction

During construction, trucks and equipment operated on site would comply with SCAQMD's anti-idling regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets regulation. Compliance with the anti-idling and diesel-fueled fleet regulations would directly reduce the amount of diesel fuel consumed during the construction phase. Construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act, which mandates standards for electrical motors and equipment. Therefore, the Proposed Project's construction activities would comply with existing energy standards, and impacts would be less than significant.

2) Operation

The Proposed Project would be required to comply with 2022 Title 24 requirements, 2022 CALGreen Code requirements, and SMC's Climate Change and Sustainability Policy Goals. Therefore, the Proposed Project would comply with energy standards with respect to electricity and natural gas usage. With respect to transportation energy, future fuel use in the region would actually be lower as a result of CAFE standards and CARB's Advanced Clean Cars Program, which would further increase fuel economy and reduce demands for transportation fuel. Therefore, the Proposed Project would comply with all existing construction and operational energy standards that are applicable to the Proposed Project, and impacts would be less than significant.

Appendix F Factor (5): The effects of the Project on energy resources.

As addressed above, the Proposed Project would result in a net decrease of 94,884 gsf of building floor area and would generate a net decrease in energy demand for electricity, natural gas and transportation fuel. Upon full buildout of the Proposed Project, electricity demand would decrease by 778,526 kWh/yr; natural gas demand would decrease by 45,622 ccf/yr; and petroleum based transportation fuel use would decrease by 472,097 gpy. Therefore, the Proposed Project would result in a net beneficial impact on energy resources and impacts would be less than significant.

Appendix F Factor (6): The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Transit accessibility, electric vehicle charging stations, and on-site bicycle parking spaces provided on-site promote efficient transportation alternatives. SMC's Main Campus is located in a SCAG-designated High Quality Transit Area (HQTA), and is supported by an extensive network of bus and light rail connections. Specifically, a total of six bus lines serve the Project Site and nearby area, including BBB local lines 7, 8, 16, 41, 43, and Rapid 7. These lines serve Santa Monica and the greater Los Angeles area and have stops located adjacent to the Project Site along Pico Boulevard and 20th Street. Additionally, Metro's 17th Street Station, which is located 0.7 miles to the north of the Main Campus at 17th Street and Colorado Avenue, provides access to Metro's Expo Line. Ridership for SMC students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro.

The SMC Main Campus has 18 EVCS and 29 EV-reserved parking spaces to support electric and electric-hybrid fuel vehicles. Additionally, there are 302 bicycle parking spaces located along the perimeter of the campus and adjacent to bike lanes along 16th Street and Pearl Street. The Main Campus has three Metro bike sharing locations. Additionally, the Proposed Project proposes a bicycle repair station within the new Pico 2 building.

As summarized above, the Proposed Project's estimated petroleum-based fuel usage would decrease as compared to existing conditions, which would serve to reduce regional VMTs as a function of accommodating smart growth planning principles. As such, the Proposed Project would encourage the efficient use of transportation alternatives, and impacts would be less than significant.

c) Conclusion to Threshold Question a)

As demonstrated in the analysis of the six factors discussed above, the Proposed Project's demands on electricity, natural gas, and transportation energy would decrease under the Proposed Project and thus would not significantly affect local and regional supplies or capacity. The Proposed Project's energy usage during base and peak periods would also be reduced, as the Proposed Project would result in a net decrease in building floor area. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Proposed Project-related construction and operational activities. Additionally, the Proposed Project would comply with all energy conservation standards applicable to the Proposed Project. In summary, the Proposed 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 the construction and operation and impacts with respect to energy consumption would be less than significant.

2. Mitigation Measures

Proposed Project impacts related to energy use would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Impacts related to energy use were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level would remain less than significant.

Threshold (b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

1. Impact Analysis

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 at least half 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. As discussed in more detail in Section IV.E Greenhouse Gas Emissions, 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, 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.

2. Mitigation Measures

Proposed Project impacts related to energy efficiency and conservation plans would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Impacts related to energy efficiency and conservation plans are less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level would remain less than significant.

F. Cumulative Impacts

1. Wasteful, Inefficient, and Unnecessary Use of Energy

The buildout of the Proposed Project, the related projects (identified in Section III, Environmental Setting, Table III-1), and additional growth forecasted to occur in the City of Santa Monica would increase energy demands during Proposed Project construction and operation and, thus, cumulatively increase the need for energy supplies.

a) Electricity

SCE and CPA provides electricity service for the related projects within the City of Santa Monica. The Proposed Project and related projects within the City may cumulatively increase the need for electricity consumption. Although future development would result in the irreversible use of renewable and non-renewable electricity resources during related project construction and operation which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for the service area. Furthermore, in accordance with current building codes and construction standards, each of the related projects

within the City of Santa Monica would be required to comply with the energy conservation standards established in Title 24 and the SMMC (as applicable to City of Santa Monica related projects). Furthermore, as discussed above, CPA and SCE supplies reliable electricity to the City of Santa Monica; thus, energy efficiency and solar-generated electricity are expected to increase in the future and significantly reduce electricity demands. Therefore, CPA and SCE anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. Compliance with Title 24 energy conservation standards, the Santa Monica Municipal Code, and other energy conservation programs on the local level would further reduce cumulative electricity demands.

Additionally, as discussed above, CPA procures 100 percent of its energy portfolio from renewable sources. Approximately 96 percent of Santa Monica customers are enrolled in 100 percent green power. Therefore, the Proposed Project and related projects would comply with energy conservation plans and efficiency standards required to ensure that energy is used efficiently. As such, the impact of the Proposed Project and related projects in regard to the wasteful, inefficient, and unnecessary use of electricity would not be cumulatively significant, and the Proposed Project's incremental effect would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

b) Natural Gas

SoCalGas would provide natural gas service for the Proposed Project and related projects in the City. As such, cumulative discussion below includes the Proposed Project and all 26 related projects. Although Proposed Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by project design features rendering the Proposed Project more energy-efficient, and would be consistent with regional and local growth expectations for SoCalGas' service area. The Proposed Project, combined with the related projects identified in Section III, Environmental Setting would not exceed the growth projections for the region. As noted in the analysis above, the Proposed Project would result in a net decrease in buildable floor area and thus would have a net decrease in the future operational energy demand. Additionally, all of the related projects would be required to comply with energy conservation standards identified in Title 24 and the Santa Monica Municipal Code, which would further reduce the use of natural gas use in all future development projects citywide. Implementation of these regulatory compliance measures would further reduce demand for natural gas. Therefore, the impact of the Proposed Project and related projects in regard to the wasteful, inefficient, and unnecessary use of natural gas would not be cumulatively significant, and the Proposed Project's incremental effect would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

c) Transportation Energy

As discussed previously, the USEPA, NHTSA, and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. The future Proposed Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption.

2. Consistency with State or Local Plans

a) Electricity

In accordance with current building codes and construction standards, as with the Proposed Project, related projects would be required to comply with the energy conservation standards established in Title 24, CALGreen Code, the Santa Monica Municipal Code, and other applicable energy conservation programs on the local level, which would further reduce cumulative energy demands. Therefore, as related projects would be required to meet the same renewable energy, energy conservation, and energy efficiency standards as the Proposed Project, cumulative impacts with respect to consistency with state and local plans for renewable energy or energy efficiency as they relate to electricity demand would be less than significant.

b) Natural Gas

As with the Proposed Project, related projects would be required to comply with energy conservation and renewable energy plans and policies described above, including Title 24, CALGreen Code, and Santa Monica Municipal Code. Therefore, as related projects would be required to meet the same renewable energy, energy conservation, and energy efficiency standards as the Proposed Project, cumulative impacts with respect to consistency with state and local plans for renewable energy or energy efficiency as they relate to natural gas demand would be less than significant.

c) Transportation Energy

As discussed previously, the USEPA, NHTSA, and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future demand for transportation fuels, such as gasoline and diesel, would be reduced as CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption, are implemented. Additionally, the Proposed Project and a majority of the related projects are located within a TPA and an HQTA, as defined by the SCAG. Therefore, as with the Proposed Project, related projects would be required to implement trip reduction measures and encourage the use of alternative modes of transportation due to land use characteristics in the vicinity of the Project Site. Therefore, as related projects would be required to meet the same

renewable energy, energy conservation, and energy efficiency standards as the Proposed Project, cumulative impacts with respect to consistency with state and local plans for renewable energy or energy efficiency as they relate to transportation energy would be less than significant.

3. Mitigation Measures

Cumulative impacts related to energy consumption and conflict with plans would be less than significant. Therefore, no mitigation measures are required.

4. Level of Significance After Mitigation

Cumulative impacts related to energy consumption and conflict with plans are less than significant without mitigation. Therefore, no mitigation measures are required or included, and the impact level would remain less than significant.

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IV.E. GREENHOUSE GAS EMISSIONS

A. Introduction

This section compares the Proposed Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, the Southern California Association of Governments (SCAG) and the City of Santa Monica to reduce greenhouse gas (GHG) emissions to determine whether the Proposed Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Proposed Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Proposed Project's GHG emissions generated by Proposed Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Proposed Project to reduce GHG emissions. Details of the GHG analysis are provided in the Air Quality and Greenhouse Gas Emissions Calculations Worksheets, which are attached as Appendix C of this Draft EIR and are incorporated by reference.

B. Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.[1]

[1] USEPA, Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases, accessed January 2025.

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.[2]

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the United States Environmental Protection Agency (USEPA), global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the Global Carbon Budget 2023 report, published in December 2023, atmospheric carbon dioxide (CO_2) concentrations in 2023 were found to be 48 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.[3] Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO_2 GHGs, these have also increased significantly since 1990.[4] In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.[5]

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.[6]

2 Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change, October 12, 2006.

3 P. Friedlingstein et al.: Global Carbon Budget 2023, December 5, 2023.

4 USEPA, Global Greenhouse Gas Emissions Data, Last updated February 15, 2023, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data, accessed January 2025.

5 USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, Last updated November 1, 2023. https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases. accessed January 2025.

6 United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.

In December 2015, the US entered into the Paris Agreement which has a goal of keeping a global temperature rise this century below 2 degrees Celsius (ºC) above pre-industrial levels and limit the temperature increase further to 1.5 ºC. This agreement requires that all parties report regularly on emissions and implementation efforts to achieve these goals.

Regarding the adverse effects of global warming, as reported by SCAG:

> *Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem.*[7]

a) GHG Fundamentals

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[8] More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in Table IV.E-1, Description of Identified Greenhouse Gases, below. [9,10]

7 SCAG, The State of the Region—Measuring Regional Progress, December 2006, p. 121.
8 As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.
9 Intergovernmental Panel on Climate Change, Second Assessment Report, Working Group I: The Science of Climate Change, 1995.
10 Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

Table IV.E-1
Description of Identified Greenhouse Gases

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

Not all GHGs possess the same ability to induce climate change. Carbon dioxide is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO_2. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of carbon dioxide (CO_2e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO_2.

The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time.[11] These GWP ratios are available from the IPCC. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values in its Fourth Assessment Report (AR4). The GWPs in the IPCC AR4 are used by the California Air Resources Board (CARB) for reporting statewide GHG emissions inventories, consistent with international reporting standards. By applying the GWP ratios, Proposed Project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has revised down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software CalEEMod is built on these assumptions, AR4 GWP values are used for the Proposed Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in Table IV.E-2, Atmospheric Lifetimes and Global Warming Potentials.

Table IV.E-2
Atmospheric Lifetimes and Global Warming Potentials

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon) (AR4 Assessment)	Global Warming Potential (100-year time horizon) (AR5 Assessment)
Carbon Dioxide (CO_2)	50 – 200	1	1
Methane (CH_4)	12 (+/-3)	25	28
Nitrous Oxide (N_2O)	114	298	265
HFC-23: Fluoroform (CHF_3)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124	138
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390	6,630
PFC-116: Hexafluoroethane ($C2F_6$)	10,000	12,200	11,100
Sulfur Hexafluoride (SF_6)	3,200	22,800	23,500
Nitrogen Trifluoride (NF_3)	740	17,200	16,100

Source: IPCC, *Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials*, *https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf, accessed January 2025.*

[11] GWPs and associated CO2e values were developed by the Intergovernmental Panel on Climate Change (IPCC) and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.

b) Projected Impacts of Global Warming in California

In 2009, California adopted a statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The California Natural Resources Agency will be updating the CAS and is responsible for preparing reports to the Governor on the status of the CAS. The Natural Resources Agency has produced climate change assessments which detail impacts of global warming in California.[12] These include:

- Sea level rise, coastal flooding, and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures, and saltwater contamination, resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO_2; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.[13]

[12] State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact, accessed January 2025.

[13] Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.

c) Regulatory Framework

There are a number of plans, regulations, programs, and agencies that provide policies, requirements, and guidelines regarding GHG emissions at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act
- Corporate Average Fuel Economy (CAFE) Standards
- Energy Independence and Security Act
- California Air Resources Board
- California Greenhouse Gas Reduction Targets
- California Global Warming Solutions Act (AB 32)
- Climate Change Scoping Plan
- Cap-and-Trade Program
- Emission Performance Standards
- Renewables Portfolio Standard Program
- California Climate Crisis Act (AB 1279)
- Pavley Standards
- California Low Carbon Fuel Standard
- Advanced Clean Cars Regulations
- Sustainable Communities and Climate Protection Act (SB 375)
- Senate Bill 743
- Executive Order N-79-20
- Executive Order B-55-18
- California Appliance Efficiency Regulations
- Title 24, Building Standards Code and California Green Building Standards Code
- CEQA Guidelines
- South Coast Air Quality Management District
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- SMC Board of Trustee Climate Change and Sustainability Policy Goals

1. Federal

a) Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHGs are pollutants under the federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the CAA, setting the stage for future regulation.

The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, CH_4 and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

1) Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011, and later for model years 2012-2016 and 2017-2021. In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe CO_2 emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[14] These standards set a combined fleet wide average of 36.9 to 37 miles per gallon (mpg) for the model years affected.[15] In February 2022, the USEPA issued the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards.[16] This final rule revises current GHG standards for vehicles in model year 2023 through model year 2026 and establishes the most stringent GHG standards ever set for the light-duty vehicle sector that are expected to result in average fuel economy label values of 40 mpg, while the standards they replace (i.e., the SAFE rule standards) would achieve only 32 mpg in model year 2026 vehicles.[17]

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010

[14] USEPA, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.
[15] National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.
[16] USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards, Vol. 86, No. 248, Federal Register page 74434, December 30, 2021.
[17] USEPA, Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards, Vol. 86, No. 248, Federal Register page 74434, December 30, 2021.

baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[18]

2) Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[19]

b) State

1) California Air Resources Board

The CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles

[18] USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

[19] A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the federal CAA. CARB adopted the 2022 SIP September 2022[20]. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020[21]. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

2) California Greenhouse Gas Reduction Targets

i) Executive Order S-3-05

Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

- By 2010, California shall reduce GHG emissions to 2000 levels;
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. The CAT provides periodic reports to the governor and legislature on the state of GHG reductions in California as well as strategies for mitigating and adapting to climate change.

The CAT stated that "smart land use" is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

ii) Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

[20] CARB State implementation Program, 2022 State Implementation Program https://ww2.arb.ca.gov/resources/documents/2022-state-strategy-state-implementation-plan-2022-state-sip-strategy. accessed January 2025.

[21] CARB, Final 2022 Climate Change Scoping Plan (Chapter 1), adopted December 2022.

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030;
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of CO_2 equivalent ($MMTCO_2e$).

iii) Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant state agencies to develop a framework for implementation and accounting that tracks progress towards this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

In October 2020, CARB released a study, which evaluated three scenarios that achieve carbon neutrality in California by 2045. The study was used by CARB in development of the 2022 Scoping Plan.[22] More ambitious carbon reduction scenarios that achieve carbon neutrality prior to 2045 may be considered as part of future analyses by the State.

The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, a Zero Carbon Energy scenario, and a Balanced scenario. The High CDR scenario achieves GHG reductions by relying on CO_2 removal strategies. The Zero Carbon Energy scenario is based on the assumption of zero-fossil fuel emissions by 2045. The Balanced scenario represents a middle point between the High CDR scenario and Zero Carbon Energy scenario. The scenarios would achieve at least an 80-percent reduction in GHGs by 2045, relative to 1990 levels. Remaining CO_2 would be reduced to zero by applying CO_2 removal strategies, including sinks from natural and working lands and negative emissions technologies, such as direct air capture.[23,24]

Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State.

[22] Energy + Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.
[23] Sinks are defined as natural or artificial reservoirs that accumulate and store a carbon-containing chemical compound for an indefinite period.
[24] Energy + Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, p. 22.

iv) Senate Bill 605 and Senate Bill 1383

Complementary to the State's larger GHG reduction goals, Senate Bill (SB) 605, adopted in 2014, directed CARB, in coordination with other state agencies and local air districts, to develop a comprehensive *Short-Lived Climate Pollutants (SLCP) Reduction Strategy*. SLCPs include CH4, HFC, and anthropogenic black carbon. These pollutants have relatively short atmospheric lifetimes but much greater influence on the climate, compared to CO_2. SB 1383 directed CARB to approve and implement the SLCP Reduction Strategy to achieve specific SLCP reduction targets by reducing organic waste disposal to 50 percent by 2020 and 75 percent by 2025. CARB adopted the SLCP Reduction Strategy in March 2017 as a framework for achieving the reduction targets set by SB 1383.[25]

3) California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines regulated GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG reductions.[26]

In 2016, the California State Legislature adopted SB 32 and its companion bill AB 1, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of state climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the scoping plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel,

[25] CAPCOA, Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, page 16, December 2021.

[26] CARB's list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are: (1) a low-carbon fuel standard, which reduces carbon intensity in fuels statewide; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills, which includes requiring the use of state-of-the-art capture technologies.

putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

AB 197, signed September 8, 2016, is a bill associated with SB 32 that prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two members of the legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

4) Climate Change Scoping Plan

The Scoping Plan is a greenhouse gas emission (GHG) reduction roadmap developed and updated by the California Air Resources Board (CARB) at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities.[27] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).[28] The 2017 Scoping Plan Update[29] shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called

[27] CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

[28] CARB. 2014. First Update to the Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

[29] CARB. 2017. California's 2017 Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

for in SB 32 and laid out in the 2017 Scoping Plan.[30] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires. The updated estimated statewide GHG emissions reductions identified in the 2022 Scoping Plan are summarized in Table IV.E-3, below.

Table IV.E-3
Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%)[a]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.
[a] 312 – 260 = 52. 52 / 312 = 16.7%
Source: CARB, Final 2022 Climate Change Scoping Plan, November 2022.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. Table IV.E-4 below provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

[30] CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

Table IV.E-4
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that the Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in the 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022) *Clean Energy, Jobs, and Affordability Act of 2022*	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.

Table IV.E-4
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 required CARB , by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 required the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO_2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high-global warming potential (GWP) HFCs to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.

Table IV.E-4
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects*	SB 27 required CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in the 2022 Scoping Plan Update as CO2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net- zero Emissions Strategy*	SB 596 required CARB , by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: ● Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. ● Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. ● Coordinate and consult with other state agencies. ● Prioritize actions that leverage state and federal incentives. ● Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy. CO2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: ● Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. ● Analyze and project the impact of climate change and other stressors in California's biodiversity. ● Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity.

Table IV.E-4
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs the 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: ● 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. ● 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. ● 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: ● Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. ● Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. ● Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by:

Table IV.E-4
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
	● Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. ● Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. ● Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 576) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.
Assembly Bill 65 (AB 65) (Petrie- Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaptation information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: ● Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. ● Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: ● Develop a framework for implementation and accounting that tracks progress toward this goal. ● Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.

Table IV.E-4
Major Climate Legislation and Executive Orders Enacted Since the 2017 Scoping Plan

Bill/Executive Order	Summary
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in the 2022 Scoping Plan Update.
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-zero-emission and Zero-emission Vehicles*	Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero-emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.

The 2022 Scoping Plan Scenario identifies the need to accelerate AB32's 2030 target, from 40 percent to 48 percent below 1990 levels. The Cap-and-Trade Program continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and executive orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors, such as smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and ZEVs;

truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries, such as construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; and improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how actions at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. SMC's Board of Trustees has taken the initiative in combating climate change by developing programs and regulations, such as adopting Climate Change and Sustainability Policy Goals, which are discussed further below.

5) Cap-and-Trade Program

The Climate Change Scoping Plan identified a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under the Cap-and-Trade Program, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[31] pursuant to its authority under AB 32. The Cap-and-Trade Program was designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The statewide cap for GHG emissions from the capped sectors[32] (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

6) Energy-Related (Stationary) Sources

i) Emission Performance Standards

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

ii) Renewables Portfolio Standard Program

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as a Renewables Portfolio Standard (RPS). Subsequent amendments provided additional targets throughout the years. On October 7, 2015, SB 350 (Chapter 547, Statues of 2015), also known as the Clean Energy and Pollution Reduction Act, further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the State to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. On September 10, 2018, SB 100 provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable

[31] California Code of Regulations 17, Section 95800 to 96023.
[32] California Code of Regulations 17, Section 95811, 95812.

energy resources and zero-carbon resources by 2045.[33]

iii) Assembly Bill 1279 (The California Climate Crisis Act)

The California Legislature enacted AB 1279,[34] The California Climate Crisis Act, on September 16, 2022. AB 1279 establishes the policy of the State to achieve net zero GHG emissions, carbon neutrality,[35] as soon as possible, but no later than 2045 and achieve and maintain net negative GHG emissions thereafter. Additionally, AB 1279 ensures that by 2045, statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. SB 1279 also requires CARB to ensure that the 2022 Scoping Plan identified and recommended measures to achieve carbon neutrality and to identify and implement policies and strategies for CO_2 removal solutions and carbon capture, utilization, and storage technologies. It also requires CARB to submit an annual report on progress in achieving the 2022 Scoping Plan's goals.

7) Mobile Sources

i) Pavley Standards

AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In 2004, CARB approved the Pavley regulation to require automakers to control GHG from new passenger vehicles for the 2009 through 2016 model years. Upon adoption of subsequent federal GHG standards by the USEPA that preserved the benefits of the Pavley regulations, the Pavley regulations were revised to accept compliance with the federal standards as compliance with California's standards in the 2012 through 2016 model years. This is referred to as the "deemed to comply" option.

In January 2012, CARB approved GHG emission regulations which require further reductions in passenger GHG emissions for 2017 and subsequent vehicle model years. As noted above, in August 2012, the USEPA and USDOT adopted GHG emission standards for model year 2017 through 2025 vehicles.[36] On November 15, 2012, CARB approved an amendment that allows

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33 California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB100, accessed January 2025.

34 California Legislative Information, AB 1279 The California Climate Crisis Act, 2022. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1279, accessed January 2025.

35 Carbon neutrality means "net zero" emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of carbon dioxide that is stored, both in natural sinks and through mechanical sequestration. AB 1279 uses the terminology net zero and the 2022 Scoping Plan Update uses the terminology carbon neutrality or carbon neutral. These terms mean the same thing and are used interchangeably.

36 United States Environmental Protection Agency, 2012.

manufacturers to comply with the 2017-2025 national standards to meet state law. Automobile manufacturers generally comply with these standards through a combination of improved energy efficiency in vehicle equipment (e.g., air conditioning systems) and engines as well as sleeker aerodynamics, use of strong but lightweight materials, and lower-rolling resistance tires.[37]

In 2018, the USEPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE) which would roll back fuel economy standards and revoke California's waiver. The rule amended certain average fuel economy and GHG standards for passenger cars covering model years 2021 through 2026. On March 30, 2020, the SAFE Rule was finalized and published in the Federal Register, commencing a review period. Subsequent legal challenges from a coalition of states, including California, and private industry groups were issued. However, in December 2021, the NHTSA repealed the SAFE Vehicle Rule Part One.[38] Although the SAFE Vehicle Rule Part One has been repealed, GHG modeling contained in regional plans, such as SCAG's 2020-2045 Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS), have not been updated to account for this repeal.

Subsequently, on March 20, 2024, USEPA announced new, more protective final standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027. The final rule builds upon USEPA's standards for federal greenhouse gas emissions standards for passenger cars and light trucks for model years 2023 through 2026, established in 2021. These standards will phase in over model years 2027 through 2032.

ii) California Low Carbon Fuel Standard

Executive Order S-01-07 was enacted by Governor Arnold Schwarzenegger on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established in California. The final regulation was approved by the State's Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the LCFS became effective on the same day. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted.[39]

[37] CARB, California's Advanced Clean Cars Midterm Review, pp. ES-17, C-9.
[38] Federal Register. Vol. 86, No. 247, December 29, 2021.
[39] CARB, Low Carbon Fuel Standard - About, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about, accessed January 2025.

The development of the 2017 Scoping Plan has identified LCFS as a regulatory measure to reduce GHG emissions to meet the 2030 emissions target. In September 2018, the standards were amended by CARB to require a 20-percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.[40]

iii) Advanced Clean Cars Regulations

In 2012, CARB approved the Advanced Clean Cars program, an emissions-control program for model years 2015–2025.[41] The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles in the 2018 through 2025 model years.[42] During the March 2017 midterm review, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV program for cars and light trucks sold in California through 2025.[43]

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, that would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales or forbid residents from owning gas-powered vehicles. In accordance with the executive order, the 2020 Mobile Source Strategy was developed by CARB, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The Mobile Source Strategy was heard by the CARB Board on October 28, 2021. The 2020 Mobile Source Strategy will be forwarded to the appropriate policy and fiscal committees of the California Legislature as required by California Senate Bill 44. The programs and concepts in the 2020 Mobile Source Strategy support other planning efforts, such as the State Implementation Plans (SIP), the 2022 Climate Change Scoping Plan Update, and community emissions reduction plans, with the state planning efforts incorporating the Mobile Source Strategy as they are developed. CARB has begun development of the 2025 Mobile Source Strategy beginning outreach in January 2024.

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is

[40] CARB, CARB amends Low Carbon Fuel Standard for Wider Impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact, accessed January 2025.

[41] CARB, Advanced Clean Cars Program - About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed January 2025.

[42] CARB, Advanced Clean Cars Program - About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed January 2025.

[43] CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective, accessed January 2025.

CARB's Advanced Clean Cars II (ACC II) Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking for ACC II regulations was adopted on November 30, 2022.

iv) Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), which was adopted by the State on September 30, 2008, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. SB 375 finds that the "transportation sector is the single largest contributor of greenhouse gases of any sector."[44] Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the MPO in which the City of Santa Monica is located. CARB set targets for 2020 and 2035 for each of the 18 MPO regions in 2010 and updated them in 2018.[45] In March 2018, CARB updated the SB 375 targets for the SCAG region to require an 8-percent reduction by 2020 and a 19-percent reduction by 2035 in per capita passenger vehicle GHG emissions.[46] As discussed further below, SCAG adopted an updated Regional Transportation Plan/Sustainable Community Strategies (2020-2045 RTP/SCS) subsequent to the update of the emission targets. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[47]

Under SB 375, the target must be incorporated within that region's RTP, which is used for long-term transportation planning, in an SCS. Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS.

v) Senate Bill 743

Governor Brown signed SB 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 required OPR to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita,

44 State of California, Senate Bill No. 375, September 30, 2008.
45 CARB, Sustainable Communities & Climate Protection Program – About. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about, accessed January 2025.
46 CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, 2018.
47 SCAG, Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, p. 5, 2020.

automobile trip generation rates, or automobile trips generated."

8) Building Standards and Other Regulations

i) California Appliance Efficiency Regulations

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

ii) Title 24, Building Standards Code and California Green Building Standards Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[48] The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[49]

[48] California Building Standards Commission, 2010 California Green Building Standards Code, (2010).
[49] California Building Standards Commission, 2010 California Green Building Standards Code, (2010).

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which went into effect on January 1, 2023. The 2022 standards continue to improve upon the previous (2019) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.[50] The 2022 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. The 2022 Title 24 standards encourage use of electric heat pumps, requiring newly constructed residences to be electric-ready and introduces solar and battery storage standards as an optional measure to achieve compliance and increases minimum ventilation requirements to improve air quality. Compliance with Title 24 is enforced through the building permit process.[51]

9) CEQA Guidelines

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring OPR to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.[52] The CEQA Guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[53]

[50] California Energy Commission, Building Energy Efficiency Standards, 2022.
[51] California Energy Commission, 2022 Building Energy Efficiency Standards.
[52] See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).
[53] 14 Cal. Code Regs. § 15064.4(b).

The administrative record for the amendments to the CEQA Guidelines also clarifies "that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[54]

2. Regional

1) South Coast Air Quality Management District CEQA Guidance

The City of Santa Monica is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[55] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[56] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less-than-significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

2) SCAG Regional Transportation Plan / Sustainable Communities Strategy

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS in September 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing

[54] Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

[55] SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/081231a.htm. accessed January 2025.

[56] SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2, accessed January 2025.

dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing and using an electric vehicle will be easier due to an expanded regional charging network.

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[57] By 2045, the integrated growth forecast estimates that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas[58] (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[59] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. OPR recommended that achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal). The reductions generated by fuel economy improvements are already included as part of the

[57] 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

[58] Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours.

[59] SCAG, Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, p. 5, 2020.

State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation.

Currently, the most recent RTP/SCS was updated and approved by SCAG's Regional Council in April 2024 (2024-2050 RTP/SCS). However, CARB has not yet approved the 2024-2050 RTP/SCS; therefore, this analysis relies on the 2020-2045 RTP/SCS. Nevertheless, a consistency analysis with the 2024-2050 RTP/SCS is provided for informational purposes to show that the Proposed Project would also not conflict with its goals and policies.

SCAG's 2024-2050 RTP/SCS introduces Priority Development Areas (PDAs) as areas within the SCAG region where future growth can be located to help the region reach the 2024-2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. The more compact form of regional development implemented through PDAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. As a general principle, development in overlapping PDAs indicates a greater alignment with the 2024-2050 RTP/SCS goals.

3. Local

a) City of Santa Monica

The Land Use and Circulation Element (LUCE) provides a set of goals, policies, and standards to guide land use and transportation decisions in the City through 2030. An important principle of the LUCE is to create a more sustainable City by providing the framework to achieve the GHG reduction goals of the Sustainable City Plan. The LUCE addresses GHG emissions through its land use and transportation decisions such as focusing new land uses near transit, creating complete neighborhoods, and supporting infill mixed-use projects, affordable and diverse housing near jobs and transit. In addition, the LUCE supports a complete network of walking and bicycling, transit improvements, carpooling, car-sharing, and Transportation Demand Management (TDM) strategies to reduce vehicle trips. The following are selected LUCE policies related to GHG emissions:

> **Goal U2:** ***Integrate Land Use and Transportation for GHG Reduction.*** Integrate land use and transportation, carefully focusing new development on transit-rich boulevards and in the districts, to create sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use and improving community quality of life.
>
> > ***Policy LU2.5 Vehicle Trip Reduction.*** Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway

improvements, expand transit service, manage parking, and strengthen TDM programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.

Policy LU2.6 Active Spaces. Focus new development in defined districts to enable active places that can support diverse local-serving retail and services, walkability, arts and culture. Require, whenever possible, new development to provide convenient and direct pedestrian and bicycle connections.

Goal LU16: ***Sustainable Urban Form.*** Assure that buildings are sustainable, environmentally sound and contribute to the City's urban form.

Policy LU16.1 Design Buildings with Consideration of Solar Patterns. The design of new buildings needs to consider the pattern of the sun, the impact of the building mass throughout the day and the year to create habitable outdoor spaces and protect adjacent structures to minimize shadows on public spaces at times of the day and year when warmth is desired and provide shade at times when cooling is appropriate, and minimize solar disruption on adjacent properties.

Policy LU16.2 Preserve Solar Access to Neighborhoods. The same development standard that is adopted to require a step down building envelope to transition commercial buildings to lower adjacent residential properties also needs to assure solar access to the residential buildings.

Goal S1: Reduce the City's GHG emissions and climate change impacts.

Policy S1.1 Proactively cooperate with the State to implement AB 32, which calls for reducing GHG emissions to 1990 levels by 2020 and 80 percent below 1990 levels by 2050.

Policy S1.2 Prepare a GHG emissions inventory approximately every five years using accounting standards approved by the International Council for Local Environmental Initiatives (ICLEI) and CARB.

Policy S1.3 Implement the LUCE policies in order to achieve the following GHG reduction targets as reflected in the Sustainable City Plan Goals:

- Reduce community-wide GHG emissions to 15 percent below 1990 levels by 2015.

- Reduce emissions from municipal operations by 30 percent below 1990 levels by 2015.

Policy S1.4 Prepare a climate action plan every 10 years to address citywide GHG emissions.

Policy S1.5 Monitor the effectiveness of the City's climate action plans against its periodic GHG emissions inventories.

Policy S1.6 Prepare a Community Urban Forest Management Plan and update it a minimum of every ten years to assist with local sequestration of CO 2 emissions.

Policy S1.7 Amend the Santa Monica Sustainable City Plan to include the following target with regard to renewable energy use: By 2030, 40 percent of all electricity use in Santa Monica should come from renewable sources.

Goal S2: Reduce GHG emissions from land use and transportation decisions.

Policy S2.1 Implement the Vehicle Miles Traveled (VMT) reducing policies of the LUCE including, but not limited to: focusing new growth in higher density, mixed-use, transit-oriented districts; focusing new growth along existing corridors and nodes; creating complete, walkable neighborhoods with goods and services within walking distance of most homes; and, implementing and supporting a wide range of pedestrian, bicycle and transit improvements in the City.

Policy S2.2 In cooperation with the state and SCAG, proactively promote the implementation of SB 375, in particular utilizing its incentives for transit-oriented development. The City will also ensure that its local plans are consistent with the SCS Plan requirement of SB 375.

Policy S2.7 Encourage major employers to find ways to provide housing assistance as part of their employee benefits package.

Policy S2.9 Consider incorporating the "no net new P.M. peak hour vehicle trips" policy into the City's CEQA environmental analysis and require mitigation of significant impacts for projects that will generate new net vehicle trips.

Goal S3: Reduce overall energy use in the City.

Policy S3.1 Actively strive to implement the City's "zero net" electricity consumption goal by 2020 through a wide variety of programs and measures, including the generation of renewable energy in the city and energy efficiency measures.

Goal S4: Increase the use of renewable energy in the City.

Policy S4.1 Explore creating an ordinance to require solar installations, both photovoltaic and hot water, on new construction projects.

Goal S5: Improve the environmental performance of buildings.

Policy S5.1 Continue to maintain a Building Code and prescriptive compliance options that meet or exceed state requirements for energy, water and other sustainability standards. Specifically, pursue California Energy Commission goals to achieve net zero energy buildings by 2020 for low-rise residential buildings and 2030 for commercial buildings and achieve a Leadership in Energy and Environmental Design (LEED)-equivalent local building code by 2020.

Policy S5.5 Encourage shade trees on south- and west-facing sides of all new buildings to reduce building energy loads.

Policy S5.6 Encourage cool roofs or green roofs on new buildings.

Policy S5.8 Encourage installation of electrical outlets in loading zones and on the exterior of new buildings to reduce emissions from gas-powered landscape maintenance and operating refrigeration for delivery trucks.

Goal S10: Create a sustainable local economy that focuses on "green" jobs.

Policy S10.3 Market Santa Monica as a green tourist destination by encouraging green retail and sustainable tourism industry practices.

b) Santa Monica College

1) Climate Change and Sustainability Policy Goals

In 2018, and again in 2020, SMC's President/ Superintendent, Dr. Kathryn Jeffery, re-affirmed SMC's commitment to doing all we can to work towards the goals of the Paris Climate Agreement. SMC joined 1,500+ cities, businesses, universities, investors, and other organizations calling to: "Drive economic growth across every sector of the economy through job-creating sustainable investments; expand U.S. leadership at home and abroad; and reimagine community partnership to advance just and equitable climate solutions and build resilience to climate change."

In January 2020, SMC's Board of Trustees adopted the following Climate Change and Sustainability Policy Goals:

Goal	2025	2030
Reduction of greenhouse gas emissions to below 1990 levels	30%	40%
Increase of renewable energy consumption	25%	50%
Of fleet vehicles are zero-emission vehicles	25%	50%
Of all new buildings and major renovations will be constructed as Zero Net Energy	50%	100%
Of all new buildings and major renovations will achieve at least a Leadership in Energy and Environmental Design (LEED) "Silver" or equivalent rating	50%	100%
Increase in the procurement of sustainable products and services compared to current levels	20%	25%
Reduction of municipal solid waste compared to current levels	25%	50%
Source: Santa Monica College, SMC Community, Sustainability, Policies and Programs, https://www.smc.edu/community/sustainability/policies-programs.php, accessed January 2025.		

2) American College & University Presidents Climate Commitment (APUPCC)

In 2008, SMC's Dr. Chui Tsang signed The American College & University Presidents Climate Commitment. This program commitment is a high-visibility effort to address global warming by garnering institutional commitments to neutralize greenhouse gas emissions, and to accelerate the research and educational efforts of higher education to equip society to re-stabilize the earth's climate. Building on the growing momentum for leadership and action on climate change, the President's Climate Commitment provides a framework and support for America's colleges and universities to go climate neutral. The Commitment recognizes the unique responsibility that institutions of higher education have as role models for their communities and in training the people who will develop the social, economic and technological solutions to reverse global warming.

Presidents signing the Commitment are pledging to eliminate their campuses' greenhouse gas emissions over time. In accordance with the commitment, thus far, SMC has completed the following steps in effort to reduce its carbon footprint:

- Completing an emissions inventory
- Within two years, setting a target date and interim milestones for becoming climate neutral.
- Taking immediate steps to reduce greenhouse gas emissions by choosing from a list of short-term actions.
- Integrating sustainability into the curriculum and making it part of the educational experience.
- Making the action plan, inventory and progress reports publicly available.

The college and university presidents and chancellors who are joining and leading the Commitment believe that exerting leadership in addressing climate change will stabilize and reduce their long-term energy costs, attract excellent students and faculty, attract new sources of funding, and increase the support of alumni and local communities.

3) Green Building Administration Regulation

As directed by the SMC Board of Trustees, at least half of all new buildings that are at least half funded with Proposition A/AA Bond monies will be 'green' buildings, built to LEED certification standards.

4) Zero Waste Policy

Following the lead set by the SMC Associated Students in 2010, the SMC Board of Trustees passed Board Policy 2480 Zero Waste Events.

The Board of Trustees recognizes and affirms the economic and environmental benefit of Zero Waste Practices in diverting food waste from landfill. Zero Waste includes recycling but goes beyond recycling by taking a whole system approach to the vast flow of resources and waste through human society. Zero Waste maximizes recycling, minimizes waste, reduces consumption and ensures that products are made to be reused, repaired or recycled back into nature or the marketplace. Industry standard for Zero Waste is 90 percent diversion of waste, allowing for minor waste generation at events.

In support of Santa Monica College's institutional commitment to sustainability, Zero Waste practices will be integrated into all college events where food and related materials are present.

5) Recycling at SMC

Santa Monica College recycles a combined 85 percent of its construction and solid waste. Cans, glass, and plastic are recycled in clearly marked containers throughout the campus. Cardboard and white and colored paper, envelopes (even those with windows), magazines, and newspapers are collected separately to retain their recycling value.

4. Existing Conditions

a) Existing State-Wide GHG Emissions

In addition to data from various AB 32 programs, the California statewide GHG inventory is a critical piece, in demonstrating the State's progress in achieving the statewide GHG targets established by AB 32 (reduce emissions to the 1990 levels by 2020) and SB 32 (reduce emissions to at least 40 percent below the 1990 levels by 2030). The 2024 edition of the GHG inventory includes the emissions of the seven GHGs identified in AB 32 for the years 2000 to 2022 and

uses an inventory scope and framework consistent with international and national GHG inventory practices.

CARB compiles GHG inventories for the State of California. Based on the 2022 GHG inventory data (i.e., the latest year for which data are available from CARB) prepared by CARB in 2022, California's annual statewide GHG emission inventory was estimated at 371.1 $MMTCO_2e$.[60] A table summary of the emissions reported by economic sector for 2022 is provided below in Table IV.E-5.

Table IV.E-5
California's 2022 Annual Statewide GHG Emissions by Economic Sector

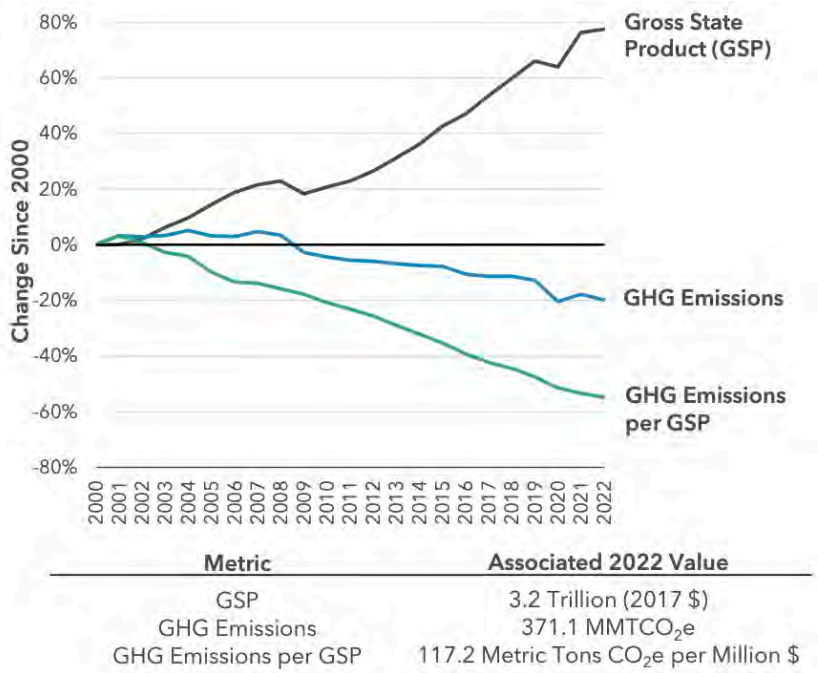
Scoping Plan Category	2022 Emissions (MMT CO_2e)	Percentage*
Transportation	139.9	37.7%
Industrial	72.7	19.6%
Electric Power	59.8	16.1%
Commercial & Residential	39.5	10.6%
Agriculture	29.8	8.0%
High GWP	21.3	5.7%
Recycling & Waste	8.2	2.2%
Total	371.1	100%
Source CARB, 2024 Edition, California Greenhouse Gas Emissions Inventory for 2000-2022, Trends of Emissions and Other Indicators, September 20, 2024, website: https://ww2.arb.ca.gov/ghg-inventory-data, accessed January 2025.		

California's GHG emissions have followed a declining trend since 2007. In 2022, emissions from statewide emitting activities were 371.1 $MMTCO_2e$, 9.3 $MMTCO_2e$ (2.4 percent) lower than 2021 levels. Since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2014, statewide GHG emissions dropped below the 2020 GHG Limit and have remained below the Limit since that time. Overall trends in the Inventory continue to demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product (GSP)) is declining. From 2000 to 2022, the carbon intensity of California's economy decreased by 54.8 percent while the GSP increased by 77.5%. California's GSP increased 0.7% in 2022. Emissions per GSP declined by 3.1% from 2021 to 2022.[61] Figure IV.E-1, below, shows these economic indicators alongside GHG emissions.

[60] CARB, 2024 Edition, California Greenhouse Gas Emissions Inventory for 2000-2022, Statewide Trends of Emissions and Other Indicators, September 20, 2024.

[61] CARB, 2024 Edition, California Greenhouse Gas Emissions Inventory for 2000-2022, Trends of Emissions and Other Indicators, September 20, 2024, p. 7.

Figure IV.E-1
Change in California GSP and GHG Emissions Since 2000



Source: CARB, 2024 Edition, California Greenhouse Gas Emissions Inventory for 2000-2022, Trends of Emissions and Other Indicators, September 20, 2024, Figure 2.

b) Existing Sustainability Features at SMC

SMC currently implements many sustainability features at the Main Campus.[62] These features include:

- Sustainability Center: The Sustainability Center is a "Living Lab" for sustainable practices and green building materials. It has been turned into an example of how an office can be efficient and productive while also having a small footprint in terms of energy, water, and waste. The Center houses the Student Greening Workshops to teach students how to become more sustainable in their personal and professional lives and is used by the eco-clubs to meet and conduct academic research related to sustainability. The Center employs student workers to promote zero waste and to run the Organic Learning Garden as well as to host annual events such as Earth Week and community beach cleanups.

- Organic Learning Garden: The Organic Learning Garden (OLG) provides the opportunity to learn, to grow SMC's own food, and better understand food systems and the impact they have on society. SMC can make their communities self-sustaining, have access to fresh and healthy food, reconnect to the earth and its traditions, and nourish bodies. The garden has about 2,000 square feet of planting space using raised beds, containers, mounded beds, and constructed herb gardens. Plots are assigned to groups of 6 or more

[62] Santa Monica College, Sustainable Facilities at SMC, website: https://www.smc.edu/community/sustainability/facilities-grounds.php. accessed January 2025.

students and/or staff or a student can join Club Grow to have access to growing food together with the club. The garden is student-run with several paid Garden Managers.

- Any Line Any Time: Since 2007, SMC and the Associated Students partnered with the Big Blue Bus to provide unlimited rides to students who pay their Student Benefits Fee. The program, now called GoPass, has expanded to include Metro buses and trains as well as a dozen other transit agencies throughout LA County (with no fee to transfer between them). Students who participate can save over $400 per year on transit costs.

- Vermitech: Since 2001, SMC has used a large composting system, which houses about 400,000 worms to convert about 500 pounds of food scraps, coming out of the cafeteria each week, into useful fertilizer. This nutrient rich soil is used on the landscaping around the Main Campus by the SMC Grounds Department. By using this system, SMC processes 10,000 pounds of food waste on the campus property, which contributes in reducing methane emissions from decomposing food waste and carbon emissions from the transportation of that food waste to distant landfills or compost facilities.

- Recycling and Zero Waste Program: In 2009 to 2010, the Board of Trustees passed a Zero waste Events Board Policy requiring events to use compostable ware and produce no more than 10% waste. The Recycling program, managed by the Recycling Specialist and student workers, has a collection plan for compostables, recyclables, clean paper, cardboard, pallets, and toner cartridges.

- Greening Our Cafeteria Vendors: On-campus food vendors are selected using comprehensive sustainability criteria. Campus Kitchen, for example, has robust environmental business practices and healthy food choices. Vendors now are more supportive of SMC's recycling, composting and Zero Waste events policy.

- Rain Catchment System: SMC’s policy is to retain as much stormwater on campus as possible. When it rains, 75,000 gallons of water are channeled to the quad where it drains down under the grass through layers of gravel and permeable cloth into this swimming pool-sized cistern. The gravel and permeable cloth provide the first layers of filtration into the holding tank (cistern). The water then slowly drains out of the cistern through the many layers of rock and sediment, thereby purifying the water to recharge the aquifers and retain rainwater.

  A smaller 2,200 gln cistern, under the Organic Learning Garden, captures rainwater which is pumped up and used for irrigation. It is healthier for the fruits and vegetables since it does not contain chemicals like fluoride, chlorine or chloramine. Together, SMC's cisterns are capturing over 200,000 gallons of rainwater during each event.

- Native Plants and Water Conservation: Drought tolerant landscaping is found throughout many areas of the Main Campus. They support local wildlife, require little maintenance and very little water. Some plants are endangered and some have benefits to the local ecosystem like feeding local bees and being fire resistant. The Sustainability Center is

planted with native species and each plant is marked for reference. Mulch has been spread throughout the yard to capture runoff from rain events to help return it to the aquifer. Rain barrels capture water from the roof which can be used during dry days to water the landscape.

- SMC LEED Buildings: SMC Bond Measure Building Projects are to be designed to meet the LEED (Leadership in Energy and Environmental Design) rating system, a widely recognized national and international benchmark for design, construction and operation of high performance buildings. The LEED rating system provides a measurable way to incorporate sustainable design into the built environment.

  Some of the distinguishing characteristics and features of a LEED building include:

  - Storm Water Quantity and Quality Control using underground cisterns
  - Water Use Reduction using low water technologies
  - Water Efficient Landscaping
  - Optimization of Energy Performance through lighting controls
  - On-Site Renewable Energy production through photovoltaic array
  - Construction Waste Management Control
  - Recycled Content of construction materials
  - Use of Certified Wood products
  - Low Emitting Materials, Adhesives, and sealants, and Paints and coatings
  - Indoor Air Quality Control
  - Thermal Comfort Control
  - Daylighting and Views

  The following buildings have been certified using LEED:
  - Student Services Building is designed under USGBC NC v3 and is seeking a LEED Platinum certification.
  - CORE Performance Center is designed under USGBC NC v3 and is certified LEED Platinum.
  - Center for Media and Design is designed under U.S. Green Building Code New Construction Version 3 (USGBC NC v3) and is certified LEED Gold.
  - HSS Building is certified LEED Silver.

- Greening the Curriculum: One of the four institutional learning outcomes is directly related to sustainability:

  "SMC students will take responsibility for their own impact on the earth by living a sustainable and ethical life style." For example, SMC has an Ecological Literacy component as part of its graduation requirements. SMC also developed the Solar Photovoltaic Installation certificate, Energy Efficiency certificate, and Recycling and Resource Management certificate. The two Environmental Associate in Arts (AA) and Associate in Science (AS) degrees offered at SMC are Environmental Studies and Environmental Science. Many traditional disciplines have “greened the curriculum” by incorporating environmental themes and examples and/or offering the Student

Sustainability Workshops as extra credit.

- Solar Energy: 779 KW of photovoltaic electricity is provided by panels found in various places around the Main Campus, including Parking Structures 3 and 4, the Library, the Sustainability Center, the Center for Media and Design, and the Student Services Center (SSC). In the middle of the day the SSC, the largest building on campus, produces 75% of its own electricity using solar.

  The Core Performance building, a gym, uses a "solar thermal" system to produce hot water for all the showers.

- EV Charging Stations:

  - **Main Campus - Student Services Center**. There are 6 level II charging stations on the first floor for students and 6 on each of the two floors below for employees. There are also 21 spaces designated for EVs and ZEVs for staging before and after charging.
  - **Main Campus - Lot 3** has 6 EV spaces on the bottom level for use by drivers with their own charging cable. (2 for Students and 4 for Employees)

  Looking ahead, EV charging stations will be integrated into each new future parking garage that may be constructed.

- Water Filling Stations: There are 17 water stations, with filters, located around campus to easily refill water bottles. When available, the Associated Students provide free reusable bottles to students.

- Energy Efficiency System Upgrades:

  High efficiency boilers installed in:
  - Drescher Hall – 95% efficiency condensing boilers
  - Science Building – 95% efficient boilers

  Lighting fixtures upgraded out of 16,000 total
  - Interior fixtures – 9905
  - Exterior fixtures – 773
  - Occupancy sensors – 700
  - Any fixture above 50 watts was targeted
  - Occupancy sensors and time clocks installed to reduce lighting

  Energy Management Systems to monitor and regulate building energy, temperature, and water use were installed in 2017.

A Central Plant has been installed in the CORE performance building on the Main Campus. It uses chillers to freeze liquid in off-peak hours and then uses the chilled water as refrigerant during the day to provide cooling to all buildings on the Main Campus. This system provides energy efficiency by centrally cooling, using off-peak electricity, and by replacing harmful CFS (a powerful greenhouse gas) with chilled water as a refrigerant.

- Sustainable Transportation: In addition to unlimited transit rides for students and employees, there are over 500 bike racks located throughout the Main Campus, DIY bike stands, repair tools, and pumps are located in the bike lot on Peart Street, and are available 24/7. SMC has been recognized as a "Bike Friendly University"-Silver level by the League of American Cyclists. In 2023 SMC was recognized by the City of Santa Monica with a Platinum Achievement Award for its transportation initiatives.

- Facilities Operations:

    - Hazardous Waste Safety Officer position created.
    - Green Seal Certified chemicals used campus-wide.
    - Irrigation Specialist position created.
    - TCBY/ The Coffee Spot is Green Business certified.
    - The SMC Bookstore on the Main Campus is Green Business certified.
    - The Facilities Department uses a fleet of electric carts on the Main Campus.

c) Main Campus Existing GHG Emissions

The SMC Main Campus is currently developed with 1,065,931 gross square feet (gsf) of existing floor area and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. Additionally, there are currently two ongoing building projects on the Project Site currently under construction. These active projects include a new Math and Science building, which is expected to open by late 2024, and the new Art Replacement building, which is expected to open by late 2025. This air quality analysis assumes a 2025 baseline for existing uses on the Project Site, which includes completion and full buildout of these two ongoing projects. There is a total of 2,860 vehicle parking spaces located in a combination of above grade and below grade parking structures and surface parking lots.

GHG emissions are currently generated by the existing uses within the Project Site from stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and from mobile sources, such as vehicle traffic traveling to and from the Project Site. The average annual GHG emissions generated by the existing uses that would be removed from the Project Site have been estimated utilizing the CalEEMod (*Version 2022.1.1.29*) computer model recommended by the SCAQMD. Table IV.E-6, Existing Project Site GHG Emissions, presents the GHG emissions associated with existing operations of the Project Site. As shown in Table IV.E-6, the existing uses on the Project Site generate approximately 24,261 $MTCO_2e$ per year.

Table IV.E-6
Existing Project Site GHG Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Mobile	16,720
Area	45
Energy	6,671
Water	126
Waste	43.3
Refrigerants	0.68
Stationary	655
Total	**24,261**

Calculation data and results provided in Appendix C to this Draft EIR.
Source: Parker Environmental Consultants, 2025.

C. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Proposed Project would have a significant impact related to GHG emissions if it would:

Threshold (a) **Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or**

Threshold (b) **Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.**

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs.

Section 15064.4 of the CEQA Guidelines does not establish a threshold of significance. Lead

agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).[63] As a note, the CEQA Guidelines were amended in response to SB 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[64] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[65] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[66] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with regulatory programs to reduce GHG emissions.[67]

63 See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

64 14 CCR § 15064(h)(3).

65 14 CCR § 15064(h)(3).

66 14 CCR § 15064(h)(3).

67 See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA..." Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO2e /yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014).

As discussed above, SCAQMD only has an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the Proposed Project as the Proposed Project is an institutional project and the Santa Monica Community College District is the Lead Agency.

In the absence of an adopted numeric threshold, the significance of the Proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Proposed Project is consistent with applicable regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Proposed Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS, which are designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS and 2024-2050 RTP/SCS; and SMC's Policies and Programs.

D. Methodology

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs).

Neither the City of Santa Monica nor SMC have adopted a numerical significance threshold for assessing impacts related to GHG emissions. In addition, the SCAQMD, OPR, CARB, CAPCOA, or any other state or regional agency have not adopted numerical significance thresholds for assessing GHG emissions that are applicable to the Proposed Project. Thus, in the absence of adopted or accepted numerical thresholds of significance for GHG emissions, the methodology for evaluating the Proposed Project's impacts related to GHG emissions focuses on the Proposed Project's consistency with applicable 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 Proposed Project's GHG-related impacts on the environment.

For information purposes, and under the guidance set forth in State CEQA Guidelines Section

15064.4(a), this analysis calculates the amount of GHG emissions that would be attributable to the Proposed Project using recommended air quality models, as described below. The estimated emissions inventory is also used to demonstrate the reduction in the Proposed Project's incremental contribution of GHG emissions as a result of compliance with regulations and building code requirements and sustainability policies that have been adopted for the purpose of reducing GHG emissions. However, for the reasons set forth above, the significance of the Proposed Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Proposed Project.

a) Project Consistency with Applicable Plans

The Proposed Project's GHG impacts are evaluated by assessing the Proposed Project's consistency with applicable statewide, regional and local GHG reduction strategies. As discussed previously, the Proposed Project will be evaluated for consistency with the 2022 Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS and 2024-2050 RTP/SCS, and SMC's Policies and Programs.

1) 2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." (Page 4 of Appendix D.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, and funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: transportation electrification, VMT reduction, and building decarbonization. "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of Appendix D.)

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing while demonstrating that a project is in alignment with the State's Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a

basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

2) 2020–2045 RTP/SCS and 2024-2050 RTP/SCS

Currently, the most recent RTP/SCS was updated and approved by SCAG's Regional Council in April 2024 (2024-2050 RTP/SCS). However, CARB has not yet approved the 2024-2050 RTP/SCS; therefore, this analysis relies on the 2020-2045 RTP/SCS. Nevertheless, a consistency analysis with the 2024-2050 RTP/SCS is provided for informational purposes to show that the Proposed Project would also not conflict with its goals and policies.

The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals. Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS outline a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

3) Santa Monica College

As previously stated, SMC's Board of Trustees has adopted Climate Change and Sustainability Policy Goals and sustainability measures for buildings on campus, such as recycling and zero waste policies and LEED rating systems. Thus, if the Proposed Project is consistent with these policies and regulations, it would result in a less than significant impact, because it would be consistent with the overarching local and State regulations on GHG reduction.

b) Quantifying GHG Emissions

The GHG emissions generated by the construction and operation of the Proposed Project's development program were estimated utilizing the CalEEMod computer model (*Version*

2022.1.1.29) recommended by SCAQMD and to satisfy CEQA Guidelines Section 15064.4(a). The primary purposes of the GHG emissions inventory are to demonstrate the reduction in the Proposed Project's incremental contribution of GHG emissions that result from regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions, and to provide further evidence that the Proposed Project would be consistent with plans adopted for the reduction of GHG emissions. Each source of GHG emissions is described in greater detail below and includes area sources, energy usage, mobile sources, refrigerants, stationary sources, waste, and water.

- Area sources include emissions from consumer products, landscape equipment and architectural coatings. No changes were made to the default area source emissions.

- Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters. However, this analysis assumes no natural gas demand for the proposed uses.[68]

- Mobile sources include emissions from the additional vehicle miles generated from the Proposed Project. The vehicle trips associated with the Proposed Project have been analyzed based on the Proposed Project trip generation calculated in the Proposed Project's traffic study. Emissions of GHGs associated with mobile sources from operation of the Proposed Project are based on the average daily trip rate, trip distance, the GHG emission factors for the mobile sources, and the GWP values for the GHGs emitted. The types of vehicles that would visit the Project Site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the Proposed Project was conducted using the vehicle fleet mix for the Los Angeles County portion of the South Coast Air Basin as provided in EMFAC2021 and CalEEMod.

- Refrigerants sources include air conditioning and refrigeration equipment.

- Stationary sources for the Proposed Project include emissions from emergency generators.

- Waste includes the GHG emissions generated from the processing of waste from the Proposed Project as well as the GHG emissions from the waste once it is interred into a landfill. AB 341 requires that 75 percent of waste be diverted from landfills by 2020, reductions for this are shown in the mitigated CalEEMod output values. SMC recycles approximately 85 percent of its construction and solid waste; therefore, a 75 percent of diverted waste is a conservative estimate.

[68] The CalEEMod program allows for the elimination of natural gas appliances and building heating systems from residential land uses but does not allow this project mitigation feature to be applied to non-residential land uses. As such, the natural gas estimates in this analysis are conservative as it includes natural gas in all land uses. However, under SMC policies, all new buildings would be all-electric.

- Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy used to transport and filter the water. California Green Building Standards require a 20 percent reduction in indoor water usage; reductions for this are shown in the mitigated CalEEMod output values. No other changes were made to the default water usage parameters.

A project's GHG emissions typically are very small in comparison to state or global GHG emissions. In isolation, a project has no significant direct impact on climate change. However, the increased accumulation of GHGs from more than one project and many sources in the atmosphere may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many air quality agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a cumulative impact, rather than project-direct impact. Not every individual project that emits GHG must necessarily be found to contribute to a significant cumulative impact on the environment.[69]

The Proposed Project's proposed development is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water, and construction equipment. The following provides the methodology used to calculate the Proposed Project-related GHG emissions and the Proposed Project impacts.

In view of the above considerations, this Draft EIR quantifies the total annual GHG emissions from the Proposed Project's proposed development program, taking into account the GHG emission reduction features that would be incorporated into the proposed design. Consistent with evolving scientific knowledge, approaches to GHG quantification may continue to evolve in the future. For purposes of quantifying the efficacy of the Proposed Project's compliance with the various regulations, plans and policies identified above, the Proposed Project's site-specific conditions, project design features, or code compliance measures are reflected under the "mitigated" scenario in the CalEEMod worksheets.[70] This is because many features in the CalEEMod Program that are defined as mitigation measures in the model are only available under the mitigation input and are not reflected in the base case. For example, all building structures shall meet or exceed 2022 Title 24, Part 6 Standards including:

- Energy efficient elevators, mechanical systems, and glazing and window frames.
- High-efficiency lighting within buildings on-site.

[69] State of California, Office of Planning and Research, Discussion Draft, CEQA and Climate Change Advisory, pg. 10, December 2018.

[70] Although the Proposed Project incorporates these features and is referred to as the "mitigated scenario" within CalEEMod, these features are not considered "mitigation measures" as defined by CEQA, and does not mean the Proposed Project will result in a significant impact requiring implementation of such a mitigation measure. The "Mitigated Scenario" is only for modeling purposes.

- ENERGY STAR-compliant appliances wherever appliances are required on-site.
- Ten percent of the required parking spaces would be provided with a charger for electric vehicles within the parking areas.
- All faucets, toilets and showers installed in the proposed structures are to utilize low-flow fixtures that would reduce indoor water demand by 20% per CalGreen Standards;
- Water-efficient irrigation systems are to be used on-site;
- Recycling programs will be required that reduces waste to landfills by a minimum of 75 percent (per AB 341).

Compliance with these regulations can only be calculated under the "mitigation" screen in CalEEMod. The project features and regulatory compliance measures included in the CalEEMod analysis are largely based on the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures document.[71] The CAPCOA measure numbers are provided next to the mitigation measures in CalEEMod to assist the user in understanding each measure by referencing back to the CAPCOA document. This methodology does not establish a quantitative threshold of significance, rather it is provided for information purposes that demonstrate the GHG reduction levels achieved through compliance with applicable GHG reduction policies and regulations.

1) Construction-Related Emissions

Construction emissions were calculated using CalEEMod *Version 2022.1.1.29*, which is based on OFFROAD model outputs. OFFROAD is an emissions estimation model developed by CARB to calculate emissions from off-road road equipment, including construction equipment. The output values used in this analysis were modeled to be project-specific, based on equipment mix, usage rates (hours per day), and length of construction schedule. For a complete discussion on these construction assumptions, see Section IV.B, Air Quality, of this Draft EIR. The mobile source emission methodology for on-road construction emissions, associated with worker commute and delivery of materials, uses a VMT rate calculated by CalEEMod in order to generate values for annual emissions. Emission factors are derived from the 2014 EMFAC model using light duty automobile factors for worker commute and heavy-duty truck factors for deliveries.

Section IV.B, Air Quality, of this EIR identifies a number of regulatory compliance measures that will have a direct reduction in the Proposed Project's generation of GHGs. For example, the Proposed Project would comply with Section 2485 in Title 13 of the California Code of Regulations, which limits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location. Additionally, the Proposed Project would be required to comply with South Coast Air Quality Management District Rule 1113, which limits the volatile organic compound content of architectural coatings. Adherence to these

[71] CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010.

applicable regulatory compliance measures would serve to reduce the Proposed Project's construction-related GHG emissions.

Pursuant to SCAQMD guidance recommended in the SCAQMD GHG Working Group meeting on November 19, 2009, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Proposed Project's proposed development. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG emission reduction measures for construction equipment are relatively limited. Therefore, the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures address construction GHG emissions as part of the operational GHG reduction strategies.[72] Accordingly, total construction GHG emissions were divided by 30 to determine annual construction emissions comparable to operational emissions.

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. To be consistent with SCAQMD guidance for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities, off-site hauling, and construction worker commuting are considered as project-generated. Due to the speculative nature of quantifying emissions from the off-site manufacture and transport of construction materials and prefabricated building components, they were not addressed in this analysis.[73] CEQA does not require an evaluation of speculative impacts (CEQA Guidelines Section 15145). Therefore, the construction analysis does not consider such GHG emissions.

2) Operational Emissions

CalEEMod *Version 2022.1.1.29* was used to calculate the energy use and potential emissions generated by development of the Proposed Project. These factors include motor vehicles, electricity, natural gas, water usage/wastewater generation, landscaping/maintenance equipment, and solid waste generation and disposal.

Motor vehicle emission calculations associated with operation of the Proposed Project development uses a projection of annual VMT, which is derived from the trips provided in default trip characteristics in CalEEMod. These values account for the daily and seasonal variations in trip frequency and length associated with travel to and from the Project Site and other activities that require a commute and are based on the VMT defaults calculated in CalEEMod.

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. Combustion of any type of fuel emits criteria pollutants and GHGs

[72] SCAQMD, Governing Board Agenda Item 31, December 5, 2008.

[73] This methodology is consistent with the recommendations of CAPCOA, CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008), https://www.ourair.org/wp-content/uploads/CAPCOA-CEQA-and-Climate-Change.pdf, accessed January 2025.

directly into the atmosphere; when this occurs in a building, this is a direct emission source associated with that building and CalEEMod calculates all of these pollutants. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used, the electricity generation typically takes place offsite at a power plant; electricity use generally causes emissions in an indirect manner and therefore GHG emissions have been calculated from electricity generation.

The amount of water consumed and wastewater generated by a project has indirect GHG emissions associated with the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both methane and nitrous oxide. Thus, CalEEMod calculates indirect GHG emissions from energy use, water/ wastewater conveyance and wastewater treatment for wastewater flows generated by development within the Proposed Project area.

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, recycling, or composting. CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecyle) data for individual land uses. CalEEMod quantifies the GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon. CalEEMod also quantifies the CO_2 emissions associated with the combustion of methane, if applicable.

E. Project Impacts

Threshold (a):	**Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

1. Impact Analysis

a) Quantification of GHG Emissions

1) Construction Emissions

Build-out of the Proposed Project would occur over a 10-year period with construction beginning in 2025 and final build-out occurring in year 2035. Construction is proposed to occur in three main phases, or endpoints, throughout a 10-year period. For purposes of providing a conservative analysis for analyzing maximum daily construction emissions, and to properly account for the potential overlap of concurrent demolition and construction activities within each phase, the environmental analysis assumes a conservative construction schedule of seven years for full buildout (four years for Phase 1, three years for Phase 2 and three years for Phase 3).

Phase 1 would include the demolition of eight buildings on the Project Site (totaling 189,981 gsf of floor area) and the new construction of three new buildings totaling approximately 188,216 gsf. The new buildings to be constructed during Phase 1 would include the Pico 1 Business

replacement building (76,474 gsf), the Pico 2 Dresher Hall replacement building (99,742 gsf), and the Police Headquarters building (12,00 gsf). Interior renovations to the Life & Physical Sciences Complex would also occur during Phase 1. To provide a conservative estimate the interior renovations to the Life & Physical Sciences Complex were modeled as new construction. Interim uses of the Art Complex and Business building will support occupants during the demolition and construction of Phase 1.

Phase 2 would include the demolition of three buildings on the Project Site (totaling 89,330 gsf of floor area) and the new construction of the Maintenance and Operation (M&O) Building (26,000 gsf) and the Student Union (42,000 gsf). Interior renovations to the Library & Media Center would also take place during Phase 2 to address aging finishes and building systems. The interior renovations to the Library & Media Center Interim were also modeled as new construction to provide a conservative air quality estimate. The Art Complex and Business building will continue to support occupants during the demolition and construction of Phase 2.

Phase 3 would include the demolition of five buildings on the Project Site (Business, Art Complex, Campus Events, Environmental Center, and Auxiliary Services) totaling 80,789 gsf of floor area, and the construction of the Pearl Street Replacements (9,000 gsf).

Emissions of GHGs were calculated using CalEEMod *Version 2022.1.1.29* for each phase and each year of construction of the Proposed Project. The results of this analysis are presented in Table IV.E-7, Proposed Project Construction-Related GHG Emissions, below. As shown in Table IV.E-7, the total construction-related GHG emissions from Proposed Project construction is approximately 4,462 $MTCO_2e$, with a majority of emissions occurring during Phase 1.

As discussed under the Methodology subsection above, the total construction emissions are amortized over 30 years and are incorporated into the Proposed Project's annualized operational emissions. Thus, the total 4,462 $MTCO_2e$ of construction emissions equates to 149 $MTCO_2e$ per year during the life of the Proposed Project.

Table IV.E-7
Proposed Project Construction-Related GHG Emissions

Year	CO_2e Emissions (Metric Tons per Year)
Phase 1	
2025	329
2026	709
2027	646
2028	427
2029	103
Total Phase 1 Construction GHG Emissions:	***2,214***
Phase 2	
2029	354
2030	493
2031	426
2032	73
Total Phase 2 Construction GHG Emissions:	***1,346***
Phase 3	
2032	279
2033	294
2034	262
2035	67
Total Phase 3 Construction GHG Emissions:	***902***
Total Construction Emissions:	**4,462**
Total Amortized Construction Emissions (30 Years):	**149**
Calculation data and results are provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations Worksheets of this Draft EIR. *Source: CalEEMod Version 2022.1.1.29, Parker Environmental Consultants, 2025.*	

2) Operational Emissions

The GHG emissions resulting from operation of the Proposed Project, which would involve the use of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, was estimated in consideration of the Project's design features, locational characteristics, and compliance with applicable regulatory measures. 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 CALGreen Code, and meeting SMC's Climate Change and Sustainability Policy Goals. As shown in Table IV.E-8, below, the Proposed Project's GHG emissions would result in a net decrease of 3,985 $MTCO_2e$ per year. This reduction is directly attributable to the net decrease in building floor area that would result from full buildout of the Proposed Project. Additionally, net GHG reductions would occur as a result of decommissioning and demolition of older less efficient buildings with newer energy efficient building systems.

Table IV.E-8
Annual Operational Greenhouse Gas Emissions at Full Buildout (2035)

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)	
	Without Regulatory and Policy Compliance	**With Regulatory and Policy Compliance**
Mobile	13,365	12,999
Area	43	43
Energy	6,231	5,883
Water	143	143
Waste	394	394
Refrigerants	0.62	0.62
Stationary	664	664
Construction Emissions [a]	149	149
Proposed Project Total:	**20,991**	**20,276**
Less Existing Project Site Uses:	*(24,261)*	*(24,261)*
Proposed Project NET TOTAL:	**(3,270)**	**(3,985)**

Notes:
[a] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Proposed Project.*
Source: CalEEMod Version 2022.1.1.29. Calculation data and results provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations Worksheets, Parker Environmental Consultants, 2025.

For informational purposes, the net effect of constructing new buildings in compliance with the CALGreen Code and implementing SMC's policies towards sustainability, including constructing new buildings the meet the equivalent of LEED Silver certification, on-site co-generation of solar power, and continuation of the public transit subsidies offered by SMC, is demonstrated in Table IV.E-8 under the column labeled "Without Regulatory and Policy Compliance." As shown in Table IV.E-8, compliance with new building code standards and SMC's energy sustainability policies and practices would generate a net reduction of 715 $MTCO_2e$ per year.

Conclusion

Based on the above, the Proposed Project would result in a net decrease in GHG emissions as compared to the existing conditions. Upon full buildout of the Proposed Project, the Main Campus would generate a total of 20,276 $MTCO_2e$ per year, which represents a net reduction of 3,985 per year as compared to the existing conditions. Therefore, Proposed Project-specific impacts with regard to climate change would be less than significant.

(1) Mitigation Measures

The Proposed Project's impacts would be less than significant. Therefore, no mitigation measures are required.

(2) Level of Significance After Mitigation

The Proposed Project's impacts related to GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

Threshold (b):	**Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

1. Impact Analysis

a) Consistency with the Climate Change Scoping Plan

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[74] A detailed assessment of goals, plans, policies implemented by SMC which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

[74] *Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.*

- **Convert local government fleets to zero-emission vehicles (ZEV)**

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. Although this measure mainly applies to new cars and trucks sold in California, the Proposed Project would support the state's goal to transition to electric vehicles. As noted in SMC's Resolution to Support Climate Change & Sustainability Goals, over 50 percent of SMC's fleet vehicles are already zero-emission with the acquisition of 66 new electric carts meeting both the 2025 and 2030 goals early.[75] Thus, the Proposed Project would be consistent with the state's policy to convert local government fleets to ZEV.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)**

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. Although this policy is aimed at cities and is not directly applicable to SMC, the Proposed Project would be compliant with the CALGreen requirements by maintaining existing EV chargers on the Main Campus, which would be consistent with the Scoping Plan goals of transitioning to EVs. There are currently 18 Electric Vehicle Charging Stations (EVCS) and 29 EV-reserved parking spaces within SMC's Main Campus to support electric and electric-hybrid fuel vehicles. These stations and spaces would be maintained and would continue to serve the students and faculty at the Main Campus. As such, the Proposed Project would be consistent with this policy.

VMT Reduction

The priority GHG reduction strategies for local government actions related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments**
- **Implement parking pricing or transportation demand management pricing strategies**

[75] SMC website: https://www.smc.edu/news/2020/2020-01-24-board-resolution-for-climate-change-and-sustainability.php, accessed May 2025.

As mentioned previously, the Proposed Project would not construct any new parking spaces or structures. However, the Proposed Project would continue to provide bike parking on campus and subsidize transit fees for the Big Blue Bus to support alternative modes of transportation. Ridership for SMC students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro. These on-site features and programs would reduce trips and encourage faculty and students to use alternative modes of transportation including public transportation, walking, and bicycling. Therefore, the Proposed Project would be consistent and not conflict with this reduction strategy to reduce parking standards.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements**

The City of Santa Monica's Land Use and Circulation Element established a goal of designing complete streets and alleys to support adjacent land uses and human activity. This reduction strategy mainly applies to City traffic circulation. However, the Proposed Project would include pedestrian network improvements to encourage walking at all times within the Main Campus. Therefore, the Proposed Project would not conflict with implementation of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.

On a local level, the City of Santa Monica has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Proposed Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located within a Transit Priority Area, as defined by SB 743, and a High Quality Transit Area, as defined by SCAG. The Main Campus is supported by an extensive network of bus and light rail connections. The Project Site is served by bus lines operated by the City of Santa Monica's Big Blue Bus. Specifically, a total of six bus lines serve the Project Site and nearby area, including BBB local lines 7, 8, 16, 41, 43, and Rapid 7. These lines serve Santa Monica and the greater Los Angeles County area and have stops located adjacent to the Project Site along Pico Boulevard and 20th Street. Additionally, Metro's 17th Street Station at 17th Street and Colorado provides access to Metro's Expo Line. The 17th Street Station is located 0.7 miles to the north of the Project Site. As such, the Project Site is located within a HQTA and would provide students, staff, and visitors with improved mobility options and convenient access to services, community-serving retail, housing, and public transit. The Walk Score® website gives 1900 Pico Boulevard a walk score of 82 (very walkable), a transit score of 53 (good transit) and a bike score of 98 (biker's paradise). Therefore, the Proposed Project would be consistent with these reduction strategies, thereby reducing VMT and GHG emissions.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- **Adopt all-electric new construction reach codes[76] for residential and commercial uses**

California's transition away from fossil fuel–based energy sources will bring the Proposed Project's GHG emissions associated with building energy use down to zero as the State's electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity

[76] Reach codes are local ordinances that go beyond state minimum building code requirements to promote energy efficiency, renewable energy, and building electrification in new construction.

provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The SMC Main Campus produces approximately 779 kW of photovoltaic electricity in various places around the campus, including Parking Structures 3 and 4, the Library, the Sustainability Center, the Center for Media and Design, and the Student Services Center (SSC). In the middle of the day the SSC, the largest building on campus, produces 75 percent of its own electricity using solar. The Core Performance building, a gym, uses a "solar thermal" system to produce hot water for all the showers. Additionally, all new buildings would be constructed as Zero Net Energy. Thus, the campus promotes the reduction of fuel gas infrastructure and would serve to reduce GHG emissions from sources traditionally powered by natural gas. Therefore, the Proposed Project would be consistent with these reduction strategies.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)**

This reduction strategy would support the Scoping Plan's action regarding electrification of appliances in existing buildings (see Table 2-1 of the Scoping Plan). The Proposed Project would involve the construction of new buildings and retrofitting and renovation of some existing buildings. As directed by SMC's Board of Trustees, at least half of all new buildings that are constructed on the campus shall be "green" buildings, built to LEED Silver certification standards, or equivalent. Additionally, the Proposed Project would comply with regulatory compliance measures specified in CALGreen Building Code, including the installation of ENERGY STAR-rated appliances, plumbing fixtures and fittings, weather-based irrigation system, and water-efficient landscaping. Therefore, the Proposed Project would be consistent and not conflict with policies to implement energy efficiency retrofits.

b) Consistency with the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS

As previously discussed, the purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Under SB 375, the primary goal of 2020-2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS outline a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. Regarding individual developments such as the Proposed Project, the strategies and policies set

forth in the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate institutional land uses within an HQTA, resulting in decreased VMT within the City. The Main Campus promotes connectivity 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. Based on a walkability assessment of the Proposed Project area by WalkScore.com, the Project Site is rated with a score of 83 of 100 possible points and defined as "very walkable – most errands can be accomplished on foot." In addition, the Proposed Project would continue to provide bicycle storage areas for its students and employees. Walkscore.com also allocates a transit score of 53 to the Project Site, described as "good transit – many nearby public transportation options," and a bike score of 99 to the Project Site, described as "biker's paradise – daily errands can be accomplished on a bike."[77]

Additionally, the Proposed 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 Main Campus to reduce overall GHG emissions including solar energy generation systems and battery storage, which would increase the production of solar energy on site. Such features also include recycling and zero waste programs, constructing new buildings that meet LEED rating systems, rain catchment systems and water conservation programs. 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.

[77] Walk Score, website: https://www.walkscore.com, accessed January 2025.

c) SMC Climate Change and Sustainability Policy Goals

In January 2020, SMC's Board of Trustees adopted Climate Change and Sustainability Policy Goals described in Table IV.E-9, below. Table IV.E-9 provides a discussion of the Proposed Project's consistency with SMC's goals of GHG-reducing actions. As such, the Proposed Project would not conflict with the goals and targets adopted by SMC's Board of Trustees.

Table IV.E-9
Project Consistency with the SMC Board of Trustees Climate Change and Policy Goals

Goal	2025	2030	Consistency Analysis
Reduction of greenhouse gas emissions to below 1990 levels	30%	40%	**No Conflict.** 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. The 20204 Master Plan Update would result in a net reduction of GHG emissions. Thus, the Proposed Project would not conflict with this GHG reduction goal.
Increase of renewable energy consumption	25%	50%	**No Conflict.** SMC currently produces solar energy on campus. The new proposed buildings would also include new PV solar panels and connections to the Main Campus's existing solar energy generation system and battery storage, which would increase the consumption of solar energy on site. Thus, the Proposed Project would not conflict with this goal.
Of fleet vehicles are zero-emission vehicles	25%	50%	**No Conflict.** As noted in SMC's Board Resolution to support Climate Change and Sustainability Goals, over 50 percent of SMC's fleet vehicles are already zero-emission with the acquisition of 66 new electric carts meeting both the 2025 and 2030 goals early. Thus, the Proposed Project would not conflict with this goal.
Of all new buildings and major renovations will be constructed as Zero Net Energy	50%	100%	**No Conflict.** Consistent with this policy, the newly constructed buildings and building renovations would be designed to meet the LEED "Silver" rating or equivalent, and would be connected to the Campus's existing photovoltaic solar power generators and batteries. Thus, the Proposed Project would not conflict with this goal.
Of all new buildings and major renovations will achieve at least a Leadership in Energy and Environmental Design (LEED) "Silver" or equivalent rating	50%	100%	**No Conflict.** Compliant with SMC Bond Measure, the newly constructed buildings would be designed to meet the LEED "Silver" certification rating or equivalent. Thus, the Proposed Project would not conflict with this goal.

Increase in the procurement of sustainable products and services compared to current levels	20%	25%	**No Conflict.** SMC carefully chooses its on-campus vendors, who are supportive of SMC's recycling, composting and Zero Waste events policy. The 2024 Main Campus Maser Plan Update would continue to practice the procurement of sustainable products and services. Thus, the Proposed Project would not conflict with this goal.
Reduction of municipal solid waste compared to current levels	25%	50%	**No Conflict.** The SMC Board of Trustees passed a Zero Waste Events Board Policy requiring events to use compostable ware and produce no more than 10 percent waste. Additionally, the campus utilizes a large-scale composing system to reduce food waste to landfills and distant compost facilities. The recycling program, managed by the Recycling Specialist and student workers, has a collection plan for compostables, recyclables, clean paper, cardboard, pallets, and toner cartridges. SMC recycles a combined 85 percent of its construction and solid waste. Cans, glass, and plastic are recycled in clearly marked containers throughout the campus. Cardboard and white and colored paper, envelopes (even those with windows), magazines, and newspapers are collected separately to retain their recycling value. The 2024 Main Campus Maser Plan Update would continue to practice solid waste reduction. Thus, the Proposed Project would not conflict with this goal.
Source: Santa Monica College, SMC Community, Sustainability, Policies and Programs, https://www.smc.edu/community/sustainability/policies-programs.php, accessed January 2025.			

Conclusion

Based on the above, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As demonstrated above, 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, Proposed Project-specific impacts with regard to GHG emissions and climate change would be less than significant.

2. Cumulative Impacts

A cumulatively considerable impact would occur where the impact of the Proposed Project in addition to the related projects would be significant. However, in the case of global climate change, the proximity of the Proposed Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. As explained earlier, the analysis of a project's GHG emissions is inherently

a cumulative analysis because climate change is a global issue and the emissions from individual projects are negligible in a global context. Accordingly, the analysis above takes into account the potential for the Proposed Project to contribute to a cumulative impact of global climate change. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[78]

The analysis above shows that the Proposed Project is consistent with the Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote improved educational facilities while at the same time achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The Proposed Project is also consistent with the RTP/SCS's regulatory requirements to reduce regional GHG emissions from the land use and transportation sectors by 2045. In addition, the Proposed Project would comply with SMC's Board of Trustees Climate Change and Sustainability Policy Goals, which includes specific targets related to energy, waste, services, and mobility. Given the Proposed Project's consistency with statewide, regional, and local plans adopted for the purpose of reducing GHG emissions, it is established that the Proposed Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. The analysis of the Proposed Project's impact is a cumulative analysis, and no further discussion is required given that the analysis above found that the Proposed Project's GHG impacts would be less than significant.

[78] California Air Pollution Control Officers Association, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008, http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf. accessed January 2025.

IV.F LAND USE AND PLANNING

A. Introduction

The following section assesses the potential for construction and operation of campus development under the SMC 2024 Main Campus Master Plan Update to result in significant land use and planning impacts. Specifically, the following analysis addresses the Proposed Project's consistency with applicable regional planning efforts and the corresponding land use and zoning designations and guidelines within the City of Santa Monica. For purposes of assessing land use and planning impacts, CEQA is concerned with physical changes to the environment, not project consistency with regulations and policies (except to the extent those policies and regulations have been adopted for the purpose of avoiding or mitigating an environmental effect). An inconsistency between a proposed project and land use controls does not in itself mandate a finding of significance; rather, such an inconsistency is merely a factor to be considered in assessing the significance of proposed changes to the physical environment. As such, this section includes a description of the existing physical and regulatory environmental setting as it relates to land use and planning, and identifies any significant environmental impacts that may occur as a result of the Proposed Project's inconsistency with local plans and policies.

Pursuant to State law, as a school district, the governing board of the Santa Monica Community College District (SMCCD) can determine to render the City's zoning ordinance inapplicable to the Master Plan. This is one of the discretionary approvals that may be required to implement certain components of the Proposed Project and can be considered by the College's governing board only after certification of this EIR. Accordingly, the following land use analysis is presented as an informational document to disclose the Proposed Project's consistency or inconsistency with the existing adopted regional land use plans and local land use and zoning regulations.

B. Environmental Setting

1. Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Southern California Association of Governments 2020-2045 RTP/SCS and 2024-2050 RTP/SCS
- City of Santa Monica General Plan
- City of Santa Monia Land Use and Circulation Element
- City of Santa Monica Zoning Ordinance

a) State

1) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive general plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

b) Regional

1) Southern California Association of Governments 2020-2045 RTP/SCS and 2024-2050 RTP/SCS

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, the 2020-2045 RTP/SCS' "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The 2020-2045 RTP/SCS' "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals and include, but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include, but are not limited to, a per-capita reduction of five percent in vehicle miles traveled (VMT) and nine percent in vehicle hours traveled (in automobiles and light/medium duty trucks); an increase of two percent in work-related transit trips; the creation of more than 264,500 new jobs; a reduction of 29 percent in greenfield development; and, building off of the 2016-2040 RTP/SCS, an increase of six percent in the share of new regional household growth

occurring in High Quality Transit Areas (HQTAs)[1] and 15 percent in the share of new job growth in HQTAs.

Currently, the most recent RTP/SCS was updated and approved by SCAG's Regional Council in April 2024 (2024-2050 RTP/SCS). However, CARB has not yet approved the 2024-2050 RTP/SCS. SCAG's 2024-2050 RTP/SCS introduces Priority Development Areas (PDAs) as areas within the SCAG region where future growth can be located to help the region reach the 2024-2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. The more compact form of regional development implemented through PDAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. As a general principle, development in overlapping PDAs indicates a greater alignment with the 2024-2050 RTP/SCS goals.

c) Local

1) City of Santa Monica General Plan

As required by state law, the City of Santa Monica has a General Plan, which is the fundamental planning policy document of the City that provides a "blueprint" for the identification of the location of land uses, as well as the basic design and function of circulation, open space, and infrastructure policies, as well as public service needs. The General Plan consists of the seven state mandated elements: Land Use and Circulation Element (revised 2023); Housing Element (2022); Open Space Element (2001); Noise Element (1992); Conservation Element (Conservation, Open Space, Scenic Corridors) (1975); Historic Preservation Element (2002); and Safety Element (1995 – update in progress).

2) City of Santa Monica Land Use and Circulation Element

The Land Use and Circulation Element (LUCE) was adopted on July 6, 2010, and amended May 2023. The 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 encompasses the community's vision for Santa Monica's future; and establishes goals, policies, and development criteria for land uses and circulation in the City. The Plan's overarching goals are to preserve the City's neighborhoods, reduce greenhouse gas (GHG) emissions, improve mobility and circulation, and encourage the creation of new housing near transit.

[1] HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

Towards this end, the LUCE establishes policies for neighborhoods, Boulevards/Corridors and distinct districts; each district serving a particular function depending on its historic uses, access to transportation, and role in the overall distribution of uses within the City. For purposes of the Proposed Project, SMCCD is the primary governmental agency responsible for approving the Proposed Project. The SMCCD Board of Trustees is the decision-making body of the District.

The essence of the LUCE land use policy is to identify an allowable building height for each land use as a baseline. Proposed development that requests additional height above the base will be subject to discretionary review and additional requirements consistent with the community's broader social and environmental goals. This approach is defined in three tiers; the base tier (ministerial up to the discretionary review thresholds established by the Zoning Ordinance) and two discretionary tiers. In most commercial areas of the City, including the major boulevards such as Wilshire Boulevard and portions of Lincoln and Santa Monica Boulevards, the maximum base height (Tier 1) for a project without providing community benefits is 32 feet (two stories). To be above the base height, new non-housing development must provide community benefits for the City and the neighborhood. Under the LUCE, an applicant for a commercial project requesting additional height above the base, known as Tier 2, will need to provide community benefits that will be considered through a discretionary permit or Development Agreement. Heights identified as Tier 3 require additional community benefits.

Several land use designations have a lower base height (Tier 1), a lower maximum height for Tier 2 and no Tier 3. The exceptions are called out later in this chapter in the discussion of each land use designation.

3) City of Santa Monica Zoning Ordinance

The Zoning Ordinance includes regulations for permitted uses, project design and development standards, parking requirements, application requirements, hearing procedures, and other information regarding land use and development in the City. The Main Campus and properties along Pearl Street would be subject to the development standards of the PL and R1 zones, respectively.

i) PL Zone

According to the City of Santa Monica Zoning Ordinance, the purpose of the "Public and Semi-Public" District is as follows (Zoning Section, Ordinance 9.15.010):

"The purposes of the "Public and semi-Public Districts" are to (1) Provide areas for a wide range of public facilities, including parks and open space, educational facilities, municipal offices, the Civic Center, museums or performance spaces, City yards, and other public or quasi-public facilities; (B) Ensure that the development and operation of public and semi-public uses protects and enhances the character and quality of life of surrounding residential areas; (C) Retain the beach as Santa Monica's character-defining open space, preserving the area as a scenic resource that serves as a local gathering place, and enhances the beach-going experience with limited visitor-serving uses; and (D) Ensure the provision of services and facilities needed to serve residents, businesses, and visitors and maintain a high quality of life standard."

The PL Institutional/Public Lands Zoning District is for public or semi-public facilities, including municipal offices, schools, libraries, museums, or performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This District is consistent with the LUCE's Institutional/Public Lands land use designation.

Relevant PL development standards include:

- Maximum building height is two stories, not to exceed 32 feet;
- Minimum parcel size is 20,000 thousand square feet; and
- Setback requirements include a minimum required front yard setback of either 10 feet and a 10-foot interior side and rear yard setbacks or 15 feet when abutting a residential district.

ii) R1 Zone

According to the City of Santa Monica Zoning Ordinance, the purpose of the "Single-Unit Residential" District is as follows (Zoning Section, Ordinance 9.07.010):

"The purposes of the "Single-Unit Residential" District are to: (A) Provide for single-unit housing on individual parcels at densities of one unit plus one accessory dwelling unit and one junior accessory dwelling unit to suit the spectrum of individual lifestyles and space needs and ensure continued availability of the range of housing opportunities necessary to meet the needs of all segments of the community consistent with the General Plan and State law; (B)Preserve and protect the existing character and state of the City's different residential neighborhoods and the quality of life of City residents against potential deleterious impacts related to development—traffic, noise, air quality, and the encroachment of commercial activities; (C) Ensure adequate light, air, privacy, and open space for each dwelling; (D) Avoid overburdening public facilities, including sewer, water, electricity, and schools by an influx and increase of people to a degree larger than the City's geographic limits, tax base, or financial capabilities can reasonably and responsibly accommodate; (E) Ensure that the scale and design of new development and alterations to existing structures are consistent with the scale, mass, and character of the existing residential neighborhood; (F) Provide sites for institutional, residential, and neighborhood serving uses such as day care, parks, and community facilities; and (G) Promote the rehabilitation and long-term maintenance of existing buildings and structures.

Relevant R1 development standards include:

- Maximum building height is two stories, not to exceed 28 feet;
- Maximum parcel coverage is 45 percent of the parcel area for a one-story structure 18 feet more in height or a two-story structure;
- Minimum parcel size is five thousand square feet; and
- Setback requirements include a minimum required front yard setback of either 20 feet or comply with the minimum required front yard setback for the district as set forth on the Official Districting Map, a rear yard setback of fifteen feet and a side yard setback of approximately 3.5 feet or 10 percent of the parcel width, whichever is greater.

2. Existing Conditions

a) Project Site

As discussed in Section II, Project Description, the Project Site includes SMC's Main Campus, located at 1900 Pico Boulevard in the City of Santa Monica, CA. Santa Monica College's Main Campus encompasses approximately 43 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.

The main campus area bounded by Pico Boulevard to the north, 18th Court to the east, Pearl Street to the south, and 16th Street to the west is zoned "PL – Institutional / Public Lands" and has a Land Use and Circulation Element (LUCE) General Plan 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 General Plan land use designations of Neighborhood Commercial and Single Family Housing, respectively. The properties on the south side of Pearl Street are zoned R1 Single Unit Residential with a corresponding General Plan land use designation of Single Family Housing. Figure II-2, Zoning and Land Use Designations, in Section II, Project Description, shows the existing land use designation on the Project Site and in the surrounding area.

b) Surrounding Land Uses

The properties surrounding the Project Site include commercial, retail, institutional, and residential land uses. Below is a description of the existing conditions surrounding the Main Campus portion of the Project Site.

North: Abutting the Project Site to the north is Pico Boulevard. There are commercial and residential properties fronting Pico Boulevard, which are zoned Neighborhood Commercial (NC) with a corresponding LUCE land use designation of Neighborhood Commercial. Further north are residential properties which are zoned R2 with a LUCE land use designation of Low Density Housing. Also to the north of the Project Site fronting Pico Boulevard is the Woodlawn Cemetery. This property is zoned PL with a LUCE land use designation of Institutional/Public Lands.

West: Abutting the Project Site to the west is 16th Street. Further west, past 16th Street, are residential properties. These properties are zoned R2 and R1 and have LUCE land use designations of Low Density Housing and Single Family Housing, respectively. Also west of the Main Campus are the SMC Pico Boulevard properties (Art Complex, Facilities Planning, the SMC Foundation, and associated parking). These properties are zoned NC and R1 and have LUCE land use designations of Neighborhood Commercial and Single Family Housing, respectively.

East: Abutting the Project Site to the east is 18th Court. Further east, past 18th Court, are residential properties zoned R2 with a LUCE land use designation of Low Density Housing. Also east of 18th Court are commercial properties zoned NC with a LUCE land use designation of Neighborhood Commercial.

South: Abutting the Project Site to the south is Pearl Street. Further south, past Pearl Street, are residential properties zoned R1 and have a LUCE land use designation of Single Family Housing. John Adams Middle School is also located south of the Project Site and is zoned PL with a LUCE land use designation of Institutional/Public Lands. Additionally, the SMC Pearl Street properties and an SMC surface parking lot are located south of the Main Campus and are zoned R1 with a LUCE land use designation of Single Family Housing.

C. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact related to land use if it would:

Threshold (a) Physically divide an established community; or

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

D. Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies between the Proposed Project and applicable general plans, specific plans, and regional plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *An inconsistency between a proposed project and applicable plan is a legal determination not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.*

Analysis of conflicts and consistency with applicable plans is included in this section of the Draft EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.), strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests, and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies.[2] Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy. To the extent that the Proposed Project's potential conflict with a plan, program, or policy is analyzed in another section of the EIR, that plan is not further discussed in this section of the Draft EIR.

[2] Office of Planning and Research [OPR], State of California General Plan Guidelines (2017).

E. Project Impacts

Threshold (a): Would the project physically divide an established community?

1. Impact Analysis

As discussed in the Initial Study (Appendix A of this Draft EIR), the Proposed Project would not physically divide an established community. 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; as such, no impact related to Threshold (a) would occur. No further analysis of this issue is required.

2. Mitigation Measures

No mitigation measures are required.

3. Level of Significance After Mitigation

There would be no impacts related to the division or separation of an established community and no mitigation measures are required.

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?

1. Impact Analysis

The development of the Proposed Project would be subject to various land use plans, policies and development regulations. The Proposed Project's consistency with the applicable regulations set forth in the 2020-2045 RTP/SCS, the 2024-2050 RTP/SCS, and the City's General Plan (including the Land Use and Circulation Element), are discussed below. The Proposed Project's consistency with other applicable plans, policies, or regulations related to other environmental topics is addressed within respective sections of this Draft EIR. Specifically, the Proposed Project's consistency with the AQMP is analyzed in Section IV.B, Air Quality, of this Draft EIR, while its consistency with Senate Bill 375 and SCAG's Sustainable Communities Strategy regarding climate change is discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

a) Regional Plans

1) SCAG's 2020-2045 RTP/SCS

On September 3, 2020, SCAG's Regional Council adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). The 2020-2045 RTP/SCS builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. With respect to land use plan consistency, the 2020-2045 RTP/SCS identifies several goals for accommodating the anticipated growth in a manner that would reduce or avoid environmental impacts. Discussed in detail in Table IV.F-1, below, is a general consistency of whether the Proposed Project would conflict with any applicable goals, objectives, and policies of the 2020-2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

Table IV.F-1
Consistency Analysis with Connect SoCal
(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)

Goals and Policies	Consistency Assessment
Connect SoCal Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** This Goal is directed towards SCAG and the City of Santa Monica and does not apply to the Proposed Project. However, the Proposed Project would modernize academic and student spaces; replace or renovate buildings in critical condition; demolish temporary and modular buildings; and activate Pico Boulevard and Pearl Street. The new buildings would enhance the City's urban form and support the regional economic prosperity and global competitiveness of Southern California. As such the Proposed Project would not conflict with this goal.
Connect SoCal Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located in a highly urbanized area within the City of Santa Monica within a High Quality Transit Area (as defined by SCAG). The Proposed Project would modernize academic and student spaces; replace and renovate buildings in critical condition; demolish temporary and modular buildings; and activate Pico Boulevard and Pearl Street. The Proposed Project is also located within a Transit Priority Area, as defined by SB 743. The Project Site is located within ½-mile of multiple bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide staff, students, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access to regional transit services.

Goals and Policies	Consistency Assessment
	The Project would allow for accessible and reliable modes of travel for the Project staff, students, and visitors as an inherent aspect of the Project Site's proximity to sources of transit and the Project's inclusion of bicycle parking spaces. Additionally, ridership for SMC students and staff is free on the BBB at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro. The Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to the Project Site and ensuring safe vehicular, bicycle, and pedestrian access. In addition, the Project would be required to coordinate with the Division of the State Architect to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. In an effort to improve safety for pedestrians on campus, the proposed bicycle circulation plan is limited to the perimeter of the Project Site. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods and would not conflict with this goal.
Connect SoCal Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This Goal is directed toward SCAG and does not apply to the Proposed Project. Nonetheless, Connect SoCal states, "A regional transportation system may be considered 'sustainable' if it maintains its overall performance over time in an equitable manner with minimal impact to the environment, while not compromising future transportation needs. Essentially, sustainability refers to how decisions made today impact future generations. One of the measures used to evaluate transportation system sustainability is the total inflation-adjusted cost per capita to maintain our existing regional multimodal transportation system in a state of good repair."[3] As discussed in the Proposed Project's Initial Study (located in Appendix A of this Draft EIR), the Proposed Project is not anticipated to generate any new vehicle trips to the Main Campus, resulting in a less than significant VMT impact. As such, the Proposed Project would not conflict with the RTP/SCS's goals and policies related to a sustainable regional transportation system. SMC also actively encourages and promotes public transit on the regional transportation system. As stated above. ridership for SMC students and staff is free on the BBB at all times and for all lines through a program funded by SMC. Ridership for all SMC students is also free on Metro buses and light rail through Metro's GoPass program, funded by Metro. Furthermore, the Proposed Project would include a new replacement building for the Campus Police Headquarters which would improve and support campus security operations. As such, the Proposed Project would be consistent with this goal.

3 SCAG, Connect SoCal 2020-2045 RTP/SCS, September 2020 (page 135).

Goals and Policies	Consistency Assessment
Connect SoCal Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Proposed Project would improve the public sidewalks adjacent to Project Site and would include activating Pico Boulevard and Pearl Street to enhance the pedestrian experience and promote walkability and travel by bicycle. The Project Site is located within ½-mile of multiple bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide staff, students, and visitors with convenient access to public transit and opportunities for walking and biking. As such, the Proposed Project would be consistent with this Goal.
Connect SoCal Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Proposed Project would renovate and replace buildings on the existing SMC Main Campus in an area that promotes the use of a variety of transportation options, including walking, biking, and the use of public transportation. This would reduce VMT and associated GHG and criteria pollutant emissions. As discussed further in Section IV.B, Air Quality, construction and operational emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections IV.D, Energy, and IV.E, Greenhouse Gas Emissions, 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, water conservation programs, and solar energy generation. Thus, the Proposed Project aims to reduce energy and greenhouse gas emissions, reduce the reliance on fossil fuels, and promote energy-efficiency standards and transportation. Therefore, the Proposed Project would be consistent with this Goal.
Connect SoCal Goal 6 Support healthy and equitable communities.	**Consistent.** The Proposed Project would renovate and replace buildings in the existing SMC Main Campus in a Transit Priority Area. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would improve the public sidewalks adjacent to the Project Site and would include enhancing the pedestrian experience and promote walkability along Pico Boulevard and Pearl Street. In addition, the Proposed Project would promote travel by bicycle by providing bicycle parking spaces on-site. Additionally, the Proposed Project is not anticipated to generate any new vehicle trips to the Main Campus. Thus, the Proposed Project would result in a less than significant VMT impact and help improve air quality. The Proposed Project supports active transportation and would be consistent with this Goal.

Goals and Policies	Consistency Assessment
Connect SoCal Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** As stated above, the Project Site is located in a highly urbanized area of Santa Monica within a HQTA (as defined by SCAG) and a Transit Priority Area (as defined by SB 743). The Project Site is located within ½-mile of multiple bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide staff, students, and visitors with convenient access to public transit and opportunities for walking and biking. The Project Site is near mass transit and in close proximity to residences, services, retail stores, and employment opportunities. The location of the Project Site encourages a variety of transportation options and access and is therefore consistent with this Goal.
Connect SoCal Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This Goal is directed towards SCAG and the City of Santa Monica and does not apply to the Proposed Project. No further discussion is required.
Connect SoCal Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Not Applicable.** This Goal is not applicable to the Proposed Project, since the Proposed Project involves renovating and replacing buildings in the existing SMC Main Campus and would not provide any housing.
Connect SoCal Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable.** This Goal is not applicable to the Proposed Project, since the Project Site does not contain any natural or agricultural lands. No further discussion is required.
Connect SoCal Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This Guiding Principle is directed towards SCAG and the City of Santa Monica and does not apply to the Proposed Project. No further discussion is required.
Connect SoCal Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This Guiding Principle is directed towards SCAG and the City of Santa Monica and does not apply to the Proposed Project. Nevertheless, the Proposed Project would continue to provide free ridership for SMC students and staff on the BBB at all times and for all lines through a program funded by SMC; and free ridership for all SMC students on Metro buses and light rail through Metro's GoPass program, funded by Metro.
Connect SoCal Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Consistent.** This Guiding Principle is directed towards SCAG and the City of Santa Monica and does not apply to the Proposed Project. However, the Proposed Project would redevelop and renovate buildings on the existing SMC Main Campus within a HQTA and a TPA. The Project Site's location near mass transit and proximity to residential neighborhoods, services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project Site promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would encourage improved access and mobility. Thus, the Proposed Project would not conflict this Guiding Principle.

Goals and Policies	Consistency Assessment
Connect SoCal Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This Guiding Principle relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupant vehicles. Nevertheless, the Proposed Project is located within a HQTA and a TPA. The Proposed Project would support public transportation and other alternative methods of transportation (e.g., transit, walking, and biking). Therefore, the Proposed Project would not conflict with this Guiding Principle.
Connect SoCal Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This Guiding Principle is directed toward SCAG and the City of Santa Monica and does not apply to the Proposed Project. However, this relates to the Connect SoCal Goal 5, above. The Proposed Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. As discussed further in Section IV.B, Air Quality, air quality emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections IV.D, Energy, and IV.E, Greenhouse Gas Emissions, the Proposed Project would include sustainability features, such as recycling and zero waste programs, constructing new buildings that meet LEED rating systems, rain catchment systems and water conservation programs, solar energy generation. The Proposed Project would aim to reduce energy consumption and greenhouse gas emissions, reduce the reliance on fossil fuels, and promote energy-efficiency standards and transportation. Therefore, the Proposed Project would not conflict with this Guiding Principle.
Connect SoCal Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This Guiding Principle is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
Connect SoCal Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This Guiding Principle is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
Connect SoCal Sustainable Communities Strategy 1 Focus Growth Near Destinations & Mobility Options	**Consistent.** As stated previously, the Proposed Project would renovate and redevelop buildings on the existing SMC Main Campus within a HQTA and a TPA. The Project Site's location near mass transit and proximity to residential neighborhoods, services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would encourage improved access and mobility. Thus, the Proposed Project is consistent with this Strategy.

Goals and Policies	Consistency Assessment
Connect SoCal Sustainable Communities Strategy 2 Promote Diverse Housing Choices	**Not Applicable.** This strategy is not applicable to the Proposed Project, since the Proposed Project involves renovating and replacing buildings in the existing SMC Main Campus and would not provide any housing. No further discussion is required.
Connect SoCal Sustainable Communities Strategy 3 Leverage Technology Innovations	**Not Applicable.** This strategy is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
Connect SoCal Sustainable Communities Strategy 4 Support Implementation of Sustainability Policies	**Consistent.** The SMC's Board of Trustees adopted climate change and sustainability policy goals, related to GHG reduction, energy consumption, vehicle fleets, and solid waste. As further discussed in Table IV.E-7 of Section IV.E, Greenhouse Gas Emissions, the Proposed Project would not conflict with the goals and targets adopted by SMC's Board of Trustees.
Connect SoCal Sustainable Communities Strategy 5 Promote a Green Region	**Not Applicable.** This strategy is directed towards SCAG and does not apply to the Proposed Project. However, this relates to the Connect SoCal Goal 5, above. See response to Connect SoCal Goal 5 and Guiding Principle 5, above. No further discussion is required.
Source: Southern California Association of Governments, Connect SoCal (2020-2045 RTP/SCS), September 2020.	

The Proposed Project would be consistent with applicable goals of the 2020-2045 RTP/SCS. The Project Site is located in a 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 2020-2045 RTP/SCS Goal 2 and 7, the Project Site would be served by local and inter-city transit operators including seven BBB bus lines service the Project Site and nearby area, including BBB local lines 7, 8, 16, 41, 43, and Rapid 7 in the Project Site vicinity. Additionally, Los Angeles County Metropolitan Transportation Authority's (Metro's) 17th Street Station at 17th Street and Colorado Avenue provides access to Metro's Expo Line. The 17th Street Station is located 0.7 miles to the north of the Project Site. 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 SMC Campus' existing electric vehicle charging infrastructure will continue to support the use of ZEVs by Proposed Project students, staff, and visitors.

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.

2) SCAG's 2024-2050 RTP/SCS

As mentioned previously, because CARB has not yet approved the 2024-2050 RTP/SCS, this document relies on the 2020-2045 RTP/SCS. Nevertheless, a consistency analysis with the 2024-2050 RTP/SCS is provided for informational purposes to show that the Proposed Project would also not conflict with its goals and policies.

SCAG's 2024-2050 RTP/SCS introduces Priority Development Areas (PDAs) as areas within the SCAG region where future growth can be located to help the region reach the 2024-2050 RTP/SCS goals. The 2024-2050 RTP/SCS plan projects that 66 percent of new households and 54 percent of new jobs between 2019–2050 will be located in PDAs, either near transit or in walkable communities. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. PDAs would create a region with transit as a backbone of the transportation system; more Complete Streets where people and safety are prioritized; policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals; more housing, jobs and mobility options closer together in PDAs to preserve natural lands and open spaces; more housing to address the "existing housing need" as defined by the Regional Housing Needs Assessment; and safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies. PDAs in the 2024–2050 RTP/SCS include neighborhood mobility areas, transit priority areas, and livable corridors.

Chapter 3 of the 2024–2050 RTP/SCS outlines goals and subgoals that are intended to help the SCAG region achieve a healthy, prosperous, accessible, and connected region for a more resilient and equitable future.

Discussed in detail in Table IV.F-2 Consistency Analysis with the 2024-2050 RTP/SCS, below, is a general consistency of whether the Proposed Project would conflict with any applicable goals and policies of the 2024-2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. As outlined in Table IV.F-2, the Proposed Project would be consistent with applicable goals and subgoals of the 2024–2050 RTP/SCS.

Table IV.F-2
Consistency Analysis with the
2024-2050 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
Mobility: Build and maintain an integrated multimodal transportation network.	**Consistent.** This goal is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to the Proposed Project. Nevertheless, the Proposed Project would support its implementation. The Proposed Project would be developed within an existing urbanized area that has an established multimodal transportation network. As previously discussed, the Project Site is served by a variety of public transit options, including BBB local lines 7, 8, 16, 41, 43, and Rapid 7, and Metro's Expo Line. Consistent with the Project Site's location within a PDA, staff, students, and visitors of the Proposed Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their school, and other destinations. Therefore, the Proposed Project would be consistent with this goal.
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	**Consistent.** While this goal is directed toward local jurisdictions as a policy strategy and does not apply to the Proposed Project, the Proposed Project would support its implementation. The Proposed Project would renovate and replace buildings on the SMC Campus in an area that promotes the use of a variety of transportation options, including walking, biking, and the use of public transportation. The Proposed Project is anticipated not to increase net VMT and associated GHG and criteria pollutant emissions. As discussed further in Section IV.B, Air Quality, construction and operational emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections IV.D Energy and IV.E, Greenhouse Gas Emissions, the Proposed Project would implement a variety of sustainability features aimed to promote renewable energy and reduce greenhouse gas emissions. Therefore, the Proposed Project would be consistent with this goal.
Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	**Consistent.** While this goal is directed toward local jurisdictions as a policy strategy and does not apply to the Proposed Project, the Proposed Project would support its implementation. As discussed above, the Project Site is served by BBB local lines 7, 8, 16, 41, 43, and Rapid 7, and Metro's Expo Line. The Proposed Project would also improve pedestrian and bicycle circulation. Thus, the Proposed Project promotes the use of a variety of transportation options, including walking, biking, and the use of public transportation. Therefore, the Proposed Project would be consistent with this goal.

Goals and Policies	Consistency Assessment
Support planning for people of all ages, abilities and backgrounds.	**Consistent.** This subgoal is directed toward public agencies as a policy strategy and does not apply to the Proposed Project. Nevertheless, the SMC Campus services and job opportunities would be available to all students and staff without discrimination. Thus, the Proposed Project would not conflict with this goal.
Communities: Develop, connect and sustain livable and thriving communities.	**Consistent.** While this goal is directed toward local jurisdictions as a policy strategy and does not apply to the Proposed Project, the Proposed Project would support its implementation. The Proposed Project would redevelop and replace existing buildings on the SMC Main Campus within a PDA. Given the Project Site's location in an urbanized area, the Proposed Project would be located in proximity to residential neighborhoods, employment, destinations, and other neighborhood services, and transit. Therefore, the Proposed Project would be consistent with this goal.
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	**Consistent.** The Proposed Project would redevelop and replace buildings on the SMC Main Campus on an already developed urban infill site in a highly developed area of the City. The Proposed Project would be located in proximity to residential neighborhoods, employment, destinations, and other neighborhood services, and transit, where people can live, work, and be educated. In addition, the Proposed Project would promote use of bicycles by providing bicycle parking spaces on-site. Overall, the Proposed Project's design and proximity to transit and other uses would increase mobility options and reduce travel distances. Therefore, the Proposed Project would be consistent with this goal.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	**Not Applicable.** This goal is not applicable to the Proposed Project, since the Proposed Project involves renovating and replacing buildings in the existing SMC Main Campus and would not provide any housing. No further discussion is required.

Goals and Policies	Consistency Assessment
Environment: Create a healthy region for the people of today and tomorrow. Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change. Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	**Consistent.** While these goals are directed toward SCAG and/or public agencies as policy strategies and do not apply to the Proposed Project, the Proposed Project would support their implementation. The Proposed Project's location, land use characteristics, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations. As discussed in Sections IV.D, Energy, and IV.E, Greenhouse Gas Emissions, the Proposed Project's new redevelopment would comply with the SMC's Board of Trustees' goals and policies aimed at reducing energy consumption and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Sustainability features include, but would not be limited to: recycling and zero waste programs, constructing new buildings that meet LEED rating systems, rain catchment systems, water conservation programs, and solar energy generation. These measures would also support resource efficiency by conserving water and energy. Therefore, the Proposed Project would be consistent with these goals.
Conserve the region's resources.	**Consistent.** While this goal is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to Proposed Project, the Proposed Project would support its implementation. As previously discussed, the Proposed Project would redevelop and replace existing buildings on the SMC Main Campus, which is an already developed urban infill site in a highly developed area of the City. It would not include development of an undeveloped site; therefore, the Proposed Project would support conservation of natural areas and open space. In addition, the Proposed Project would promote energy, water, and other conservation requirements. Thus, the Proposed Project would be consistent with this goal.
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.	**Consistent.** While this goal is directed toward SCAG as a policy strategy and does not apply to the Proposed Project, the Proposed Project would support its implementation. The Proposed Project would redevelop and replace buildings on the SMC Campus on an urban infill site within a highly urbanized area of the City. These uses would modernize academic and student spaces to provide excellent environments for learning, studying, collaborating, and gathering that support the engagement and success of students. Therefore, the Proposed Project would be consistent with this goal.

Goals and Policies	Consistency Assessment
Improve access to jobs and educational resources.	**Consistent.** The Proposed Project would redevelop and replace existing buildings on the SMC Main Campus. These uses would modernize academic and student spaces to provide excellent environments for learning, studying, collaborating, and gathering that support the engagement and success of students. The Proposed Project would also achieve a more cohesive, first-class, state-of-the-art educational environment. Thus, the Proposed Project would aim to improve educational resources. Therefore, the Proposed Project would not conflict with this goal.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	**Not Applicable.** The Proposed Project would not involve the movement or transportation of goods within the region. As such, this policy is not applicable to the Proposed Project.
Source: Southern California Association of Governments, Connect SoCal (2024-2050 RTP/SCS), April 2024.	

The Proposed Project's location, scale, and mixture of land uses would be consistent with its designation within a 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 near several bus lines, including BBB local lines 7, 8, 16, 41, 43, and Rapid 7 and Metro Expo Line. Thus, the Project Site is located in an urban area near transit, which would provide opportunities for Proposed 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.

b) Local Plans

1) City of Santa Monica Land Use and Circulation Element

The portion of the SMC Main Campus bound by Pico Boulevard to the north, 16th Street to the west, Pearl Street to the south and 18th Court to the east 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.

The LUCE includes a number of goals and policies that provide guidance for future development, including education. Consistency with goals and policies that are particularly relevant to the land use relationship between the Proposed Project and surrounding uses is evaluated in Table IV.F-3, Project Consistency with the Applicable Goals and Policies of the LUCE, below. As indicated, the Proposed Project would be consistent with relevant LUCE goals and policies related to preserving and enhancing existing neighborhoods; and encouraging walking, bicycling, and public transit.

Table IV.F-3
Project Consistency with the Applicable Goals and Policies of the LUCE

LUCE Goals and Policies	Consistency Analysis
Land Use Element	
GOAL LU1: Neighborhood Conservation – Protect, conserve and enhance the City's diverse residential neighborhoods to promote and maintain a high quality of life for all residents. Establish a program of incentives and restraints to redirect intensive residential investment pressure away from existing neighborhoods and control residential investment pressure within neighborhoods.	**No Conflict.** The SMC campus is currently operational with education related uses under the direction of SMC in varying capacities. The Proposed Project would include renovations, structural upgrades, demolition, and new construction. As such, general campus operations would essentially remain unchanged. Residential neighborhoods surround the SMC campus. The Proposed Project would not demolish any existing residential land uses. New construction and renovations would occur on sites where there are already existing buildings within the SMC campus. Therefore, the Proposed Project would ensure compatibility with adjacent land uses, including residential land uses.

GOAL LU2: Integrate Land Use and Transportation for Greenhouse Gas (GHG) Emission Reduction – Integrate land use and transportation, carefully focusing new development on transit-rich boulevards and in the districts, to create sustainable active pedestrian-friendly centers that decrease reliance on the automobile, increase walking, bicycling and transit use, and improve community quality of life. **Policy LU2.5 Vehicle Trip Reduction.** Achieve vehicle trip reduction through comprehensive strategies that designate land uses, establish development and street design standards, implement sidewalk, bicycle and roadway improvements, expand transit service, manage parking, and strengthen Transportation Demand Management programs that support accessibility by transit, bicycle and foot, and discourage vehicle trips at a district-wide level. Monitor progress using tools that integrate land use and transportation factors. Increase bicycle and pedestrian connectivity in transit districts and adjust bus and shuttle services to ensure success of the transit system.	**No Conflict.** The Proposed Project would not result in the generation of additional employees or students. Thus, the Proposed Project would not increase overall vehicles trips. Furthermore, ridership for SMC students and staff would continue to be free on the Big Blue Bus and Metro buses at all times and for all lines through a program funded by SMC and Metro. Thus, the Proposed Project would promote the use of transit and other modes of transportation. Thus, the Proposed Project would not conflict with this goal and policy.
GOAL LU9: Monitoring and Managing Land Use Changes – Actively monitor and manage change to address community needs, promote citywide sustainability and ensure community livability.	**No Conflict.** The Proposed Project's primary objectives for its renovations and improvements are to address the community needs through supporting students and elevating the campus experience. The Proposed Project would improve the campus for the students and faculty. Thus, the Proposed Project would not conflict with this goal.
GOAL LU15: Enhance Santa Monica's Urban Form – Encourage well-developed design that is compatible with the neighborhoods, responds to the surrounding context, and creates a comfortable pedestrian environment.	**No Conflict.** The Proposed Project would modernize academic and student spaces; replace or renovate buildings in critical condition; demolish temporary and modular buildings; and active Pico Boulevard and Pearl Street. The new buildings would be designed in a manner that is respectful to the adjacent land uses, specifically the surrounding residential neighborhoods, and would not obstruct any scenic or panoramic viewsheds. Thus, the Proposed Project would enhance the surrounding urban environment and would not conflict with this goal.

Policy LU15.2 Respect Existing Residential Scale. New commercial or mixed-use buildings adjacent to residential districts shall be contained within a prescribed building envelope designed to maintain access to light and air and to preserve the residential character.	**No Conflict.** Residential neighborhoods surround the SMC campus. The Proposed Project would not demolish any existing residential land uses. New construction and renovations would occur on sites where there are already existing buildings within the SMC campus. Additionally, the new buildings would be designed in a manner that is respectful to the adjacent land uses, specifically the surrounding residential neighborhoods, and would not obstruct any scenic or panoramic viewsheds. Therefore, the Proposed Project would ensure compatibility with adjacent residential land uses and would not conflict with this policy.
Circulation Element	
GOAL CE12: Support the SMMUSD and Santa Monica College capital planning and implementation in recognition of their important role in the City.	**No Conflict.** The Proposed Project consists of the adoption and implementation of the SMC 2024 Main Campus Master Plan Update, which outlines a renewed framework for SMC's future growth and development amidst changes in educational modalities, new opportunities, and optimized use of financial resources for SMC's Main Campus. This goal is directed towards the City in support of SMC's capital planning programs.
Policy CE12.2 Provide guidance based on LUCE principles and encourage implementation of SMC's campus modernization and renovation plans.	**No Conflict.** This policy is directed towards the City in regard to providing guidance and encouragement to SMC based on the planning principles identified in the LUCE. The City was provided with an opportunity to provide comments on the Proposed Project during the public review period of the Notice of Preparation (NOP). Future opportunities for the City to provide comments will be available during the public review period of the Draft EIR, and the Santa Monica College Board of Trustee's public hearing to consider certification of the EIR.
GOAL CE13: Maximize the community benefit of educational and City facilities through coordinated planning and shared use. **Policy CE13.2:** Work with SMC to explore facility development opportunities with mutual benefits to the college and the City.	**No Conflict.** This policy is directed towards the City in regard to maximizing community benefits of educational and City facilities. The Proposed Project would be mutually beneficial to the City as it would enhance and improve outdated facilities on the SMC Main Campus and would incorporate a new replacement building for the SMC Police Headquarters. The presence of the SMC Campus Police Headquarters building on Pearl Street will serve to improve campus security on-site and off-site in the local community. As such, the project would not conflict with this Policy.

GOAL CE14: Increase use of transit, walking and bicycling as an alternative to the automobile for students and employees of the city's schools and colleges. **Policy CE 14.1:** Encourage and support efforts to increase transit ridership, walking and bicycling to educational facilities, reducing vehicle trips. **Policy CE14.4:** Work with and support SMC and the SMMUSD in developing and implementing a TDM program to reduce vehicle trips to and between satellite campuses, potentially including bus system enhancements and/or a universal bus pass program with the Big Blue Bus to increase transit ridership.	**No Conflict.** The Proposed Project would provide improved and distinct pedestrian access and circulation through the Main Campus. The Proposed Project would retain the current vehicular circulation and access points and existing parking supply. The Proposed Project does not include any changes to the current bicycle access and circulation patterns, which limits bicycle riding to the perimeter of the Campus and includes dedicated bicycle parking spaces. The Proposed Project would further promote bicycle riding as an alternative mode of transit as the Project includes a bicycle repair station within the new Pico 2 building. The Main Campus is supported by an extensive network of bus and light rail connections. The Project Site is served by bus lines operated by the City of Santa Monica's Big Blue Bus. Specifically, a total of six bus lines serve the Project Site and nearby area. Ridership for SMC students and staff is free on the Big Blue Bus at all times and for all lines through a program funded by SMC. Ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro. It is anticipated that these programs would continue throughout the operation of the Proposed Project. As such, the Proposed Project would be consistent with this goal and policies.
Source: City of Santa Monica, Land Use and Circulation Element, Adopted July 6, 2010, amended May 2023.	

2) City of Santa Monica Zoning Code

As previously discussed, the SMC Main Campus is predominately zoned PL – Institutional / Public Lands and has a land use designation of Institutional / Public Lands, with limited outlying properties zoned Neighborhood Commercial and R1- Single Unit Residential with corresponding land use designations of Neighborhood Commercial and Single Family Housing, respectively. The following discussion addresses the general development standards for each applicable zone.

i) PL Zone

The SMC 2024 Main Campus Master Plan provides for the demolition of existing instructional building spaces and the construction of new instructional buildings and outdoor amenity spaces within the PL-zoned portions of the Main Campus that are consistent with the underlying Institutional/Public Lands zoning and land use designation. As such, the Proposed Project would be consistent with the allowable uses as identified in the LUCE.

With respect to development standards for the Main Campus zoned PL, the maximum building height is two stories, not to exceed 32 feet. Pico 1 and 2 will have a maximum height of 70 feet and allow up to 4 stories. This scale is needed as Pico 1 and 2 will house many academic and student centered functions. The M&O building will be a maximum of 30 feet to match the existing context and blend with the existing campus. The new Student Union will be a maximum height of 50 feet to respect the existing fabric of the campus and to fit proportionally with its surrounding context. 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, visual character and design, as described in more detail in Section IV.A, Aesthetics. As noted in Section IV.A, Aesthetics, the height of the proposed buildings would not cast significant shade and shadow impacts upon neighboring buildings during either the winter or summer months. As such, aesthetic impacts were determined to be less than significant. Thus, this height inconsistency would not result an adverse physical effect on the environment. Furthermore, this technical inconsistency would be resolved through SMC's utilization of Section 53094 of the California Government Code, which provides that school districts may override local zoning regulations.[4]

With respect to setbacks, developments in a PL zone shall be set back 10 feet and 15 feet when abutting a residential district. The Pico 1 and 2 buildings will be set back 30 feet from the curb to prevent these somewhat taller buildings from encroaching on the public realm. Additionally, to prevent the feeling of an imposing building, the design recommendations encourage terracing the upper floors and thereby allow for visual transition from the ground level. The M&O building will be set back 20 feet from Pearl Street to allow a landscaping buffer and to match the existing context. The Student Union would provide generous setbacks (none is less than 40 feet from a neighboring building) to allow ample space for movement around the building. Thus, the Proposed Project would comply with the setback requirements of the zoning ordinance.

[4] California Codes – Government Code – Section 53090-53097.5, website: https://pw.lacounty.gov/bsd/lib/fp/Drainage%20and%20Grading/County,%20State,%20Federal%20-%20Codes,%20Policies,%20Regulations/CA%20State%20Gov%20Code%2053097-Schools.pdf, accessed January 2025.

ii) R1 Zone

The SMC 2024 Main Campus Master Plan would include the demolition of the existing SMC Police Headquarters and instructional building spaces (Campus Events, Auxiliary Services, Environmental Center, and Greenhouse) and the construction of a new replacement SMC Police Headquarters and instructional buildings within the R1-zoned portions of the Main Campus. These new replacement buildings are consistent with the existing Campus police services and instructional land uses that already occupy these properties. As the redevelopment of these building would result in the continuation of the existing SMC uses, no changes to the existing land use patterns would occur. As such, no new environmental impacts would occur as a result of modernizing the Police Headquarters building[5] and Pearl Street replacement instructional buildings.

With respect to the development standards in the R1 zone, the maximum building height is two stories, not to exceed 28 feet. The Proposed Project would construct a new Police Headquarters building on the current site of the Police Headquarters along Pearl Street. The main police building on the west of the lot will have a maximum height of 35 feet, while the smaller building to the east transitions to a maximum height of 25 feet. This change in scale allows for a seamless transition to the neighboring buildings while also providing visual interest while moving down Pearl Street. The Pearl Street replacement buildings will have a maximum height of 25 feet to respect the height of the neighboring residential homes and blend into the urban fabric surrounding the SMC campus.

The Proposed Project will introduce new structures to the campus that would exceed the allowed building height by 7 feet as called for in the R1 zone. However, it should be noted that the proposed building heights, scale and massing would be consistent with several existing campus and nearby structures, and as described in more detail in Section IV.A, Aesthetics, the Proposed Project would have less than significant impacts related to visual character and design. As noted above, an inconsistency between a proposed project and land use controls does not in itself mandate a finding of significance for purposes of CEQA; rather, such an inconsistency is merely a factor to be considered in assessing the significance of proposed changes to the physical environment. As discussed above, the height inconsistency with the R1 zone would not result an adverse physical effect on the environment. Furthermore, the technical zoning inconsistency would be resolved through SMCCD's utilization of Section 53094 of the California Government Code, which provides that school districts may override local zoning regulations. As such, impacts associated with the R1 zoning classification of the Main Campus would be considered less than significant.

[5] The Police Headquarters building includes instructional space for public safety training and cadet programs, which complements SMC's academic program in Administration of Justice (a/k/a Criminal Justice).

With respect to setbacks, developments in a R1 zone are to include a minimum front set back of 20 feet, a minimum of 3.5 side foot setback, and a 15-foot rear yard setback. The Campus Police Headquarters is set back 20 feet from the curb to match the existing context. A 30-foot gap between the two police buildings allows for a driveway to accommodate parking at the rear of the eastern police buildings. The Pearl Street replacement buildings will be set back 20 feet from the street edge to match the existing context currently on Pearl Street. Thus, the Proposed Project would comply with the setback requirements of the Zoning Ordinance.

In summary, Proposed Project impacts associated with the PL and R1 zoning classifications of the City's Zoning Ordinance would be considered less than significant.

Conclusion

Based on the analysis above, 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 and the City's General Plan (including the Land Use and Circulation Element) and existing land use patterns. Furthermore, the City's 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, as such, impacts related to Threshold (b) and land use policy consistency would be less than significant.

2. Mitigation Measures

The Proposed Project would not conflict with any of the applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect, and, as such, land use impacts would be less than significant.

3. Level of Significance After Mitigation

Land use impacts would be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant without mitigation.

F. Cumulative Impacts

1. Impact Analysis

Cumulative land use impacts could occur if other related projects in the vicinity of the Project Site would result in land use incompatibility effects in conjunction with the impacts of the Proposed Project. As discussed in Section III, Environmental Setting, of this Draft EIR, the Lead Agency has identified a total of 26 pending, recently approved, under construction, or reasonably foreseeable development projects in one-half mile radius of the Project Site that could be considered related projects with the potential to produce localized cumulative impacts on the environment when considered in conjunction with the Proposed Project.

The Proposed Project would comply with all important local and regional goals and policies for the area, which would assist the City of Santa Monica and Santa Monica College in achieving short- and long-term planning goals and objectives. Furthermore, all related projects would be subject to the same development standards as the Proposed Project with respect to assessing the consistency of each related project's respective General Plan, Zoning Ordinance, and the other applicable specific and regional land use plans that govern their respective geographic area. Therefore, the Proposed Project and related projects would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect, and, as such, cumulative impacts related to conflict with land use plans would be less than significant.

2. Mitigation Measures

Cumulative impacts related to land use plans, policies, and zoning would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Cumulative impacts related to land use plans, policies, and zoning would be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant without mitigation.

IV.G NOISE

A. Introduction

This section of the Draft EIR analyzes potential noise and vibration impacts of the Proposed Project. Included in this section is a description of the existing noise and vibration levels within the Project Site area, an estimation of future noise and vibration levels at surrounding sensitive land uses associated with construction and operation of the Proposed Project, a description of potential significant noise impacts, and the inclusion of mitigation measures to address any identified potential significant noise impacts. Additionally, this section of the Draft EIR evaluates the Proposed Project's incremental contribution to potential cumulative noise and vibration impacts resulting from past, present, and probable future projects. The Noise Calculation Worksheets are included in Appendix F of the Draft EIR.

B. Environmental Setting

1. Noise and Vibration Basics

Due to the technical nature of noise and vibration impacts, a brief overview of basic noise principles and descriptors is provided below.

a) Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as undesirable (i.e., loud, unexpected, or annoying) sound. Acoustics is defined as the physics of sound and addresses its propagation and control.[1] In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement and reflects the way people perceive changes in sound amplitude.[2] The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make

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1 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.

2 All sound levels measured in decibel (dB), as identified in the noise calculation worksheets included in Appendix F of this Draft EIR and in this section of the Draft EIR, are relative to $2x10^{-5}$ N/m^2.

up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of feeling pain. Pressure waves traveling through air exert a force registered by the human ear as sound.[3]

Sound pressure fluctuations can be measured in units of hertz (Hz), which correspond to the frequency of a particular sound. Typically, sound does not consist of a single frequency, but, rather, a broad band of frequencies varying in levels of magnitude. When all of the audible frequencies of a sound are measured, a sound spectrum is plotted consisting of a range of frequencies spanning 20 to 20,000 Hz. The sound pressure level, therefore, constitutes the additive force exerted by a sound corresponding to the sound frequency/sound power level spectrum.[4]

The typical human ear is not equally sensitive to the frequency range from 20 to 20,000 Hz. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 Hz and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to these extremely low and extremely high frequencies. This method of frequency filtering or weighting is referred to as A-weighting, expressed in units of A-weighted decibels (dBA), which is typically applied to community noise measurements.[5] Some representative common outdoor and indoor noise sources and their corresponding A-weighted noise levels are shown in Figure IV.G-1, Decibel Scale and Common Noise Sources.

b) Noise Exposure and Community Noise

Community noise exposure is typically measured over a period of time; a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the sound sources contributing to the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with many unidentifiable individual contributors. Single-event noise sources, such as aircraft flyovers, sirens, etc., may cause sudden changes in background noise level.[6] However, generally, background noise levels change gradually throughout the day, corresponding with the addition and subtraction of distant noise sources, such as changes in traffic volume.

[3] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

[4] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

[5] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.3, September 2013.

[6] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, September 2013.

Figure IV.G-1 Decibel Scale and Common Noise Sources

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock band
Jet flyover at 1,000 feet		
	100	
Gas lawnmower at 3 feet		
	90	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	80	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawnmower, 100 feet	**70**	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	**60**	
		Large business office
Quiet urban daytime	**50**	Dishwasher in next room
Quiet urban nighttime	**40**	Theater, large conference room (background)
Quiet suburban nighttime		
	30	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	20	
		Broadcast/recording studio
	10	
	0	

Source: State of California, Department of Transportation, Technical Noise Supplement, 2009.

These successive additions of sound to the community noise environment change the community noise level from moment to moment, requiring the noise exposure to be measured over periods of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts. The following noise descriptors are used to characterize environmental noise levels over time.[7]

L_{eq}: The equivalent sound level over a specified period of time, typically, 1 hour (L_{eq}). The L_{eq} may also be referred to as the average sound level.

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

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

[7] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.2, September 2013.

L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} and L_{90} represent the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

L_{dn}: The average A-weighted noise level during a 24-hour day, obtained after an addition of 10 dBA to measured noise levels between the hours of 10:00 P.M. to 7:00 A.M. the next day to account for nighttime noise sensitivity. The L_{dn} is also termed the day-night average noise level (DNL).

CNEL: The Community Noise Equivalent Level (CNEL) is the time average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 P.M. to 10:00 P.M. and an addition of 10 dBA to noise levels between the hours of 10:00 P.M. to 7:00 A.M. the next day to account for noise sensitivity in the evening and nighttime, respectively.

c) Effects of Noise on People

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startled response); and
- Physical effects (e.g., hearing loss).

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep.

The World Health Organization's Guidelines for Community Noise details the adverse health effects of high noise levels, which include hearing impairment, speech intelligibility, sleep disturbance, physiological functions (e.g., hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, social and behavioral effects (e.g., feelings of helplessness, aggressive behavior), and annoyance.[8]

[8] World Health Organization Team, edited by Berglund, Birgitta; Lindvall, Thomas; Schwela, Dietrich H, Guidelines for Community Noise, 1999.

With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Thus, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it. With regard to increases in A-weighted noise levels, the following relationships generally occur:[9]

- Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived;
- Outside of the laboratory, a change of 3 dBA in ambient noise levels is considered to be a barely perceivable difference;
- A change of 5 dBA in ambient noise levels is considered to be a readily perceivable difference; and
- A change of 10 dBA in ambient noise levels is subjectively heard as doubling of the perceived loudness.

These relationships between change in noise level and human hearing response occur in part because of the logarithmic nature of sound and the dB scale. Because the dBA scale is based on logarithms, two noise sources do not combine in a simple additive fashion, but, rather, logarithmically. Under the dBA scale, a doubling of sound energy corresponds to a 3-dBA noise level increase. In other words, when two sources are each producing sound of the same loudness, the resulting sound level at a given distance would be approximately 3 dBA higher than one of the sources under the same conditions. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA. Under the dB scale, three sources of equal loudness together produce a sound level of approximately 5 dBA louder than one source, and 10 sources of equal loudness together produce a sound level of approximately 10 dBA louder than the single source.[10]

[9] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, 2013.

[10] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1.1, September 2013.

d) Noise Attenuation

When noise propagates over a distance, the noise level reduces, or attenuates, with distance depending on the type of noise source and the propagation path. Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." The rate of sound attenuation for a point source, such as a piece of mechanical or electrical equipment (e.g., air conditioner) or idling vehicle (e.g., bulldozer), is 6 dBA per doubling of distance from the noise source to the receptor over acoustically "hard" sites and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically "soft" sites.[11] Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the reduction in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees, which in addition to geometric spreading, provide an excess ground attenuation value of 1.5 dBA (per doubling distance).[12] For example, an outdoor condenser fan that generates a sound level of 60 dBA at a distance of 50 feet from a point source at an acoustically hard site would attenuate to 54 dBA at a distance of 100 feet from the point source and attenuate to 48 dBA at 200 feet from the point source.

Roadways and highways consist of several localized noise sources on a defined path and, hence, are treated as "line" sources, which approximate the effect of several point sources.[13] Noise from a line source propagates over a cylindrical surface, often referred to as "cylindrical spreading."[14] Line sources (e.g., traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.[15] Therefore, noise due to a line source attenuates less with distance than that of a point source with increased distance.

Structures (e.g., buildings and solid walls) and natural topography (e.g., hills and berms) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., the line-of-sight is not fully blocked), barrier insertion loss would still occur but to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived

[11] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.

[12] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.1 and 2.1.4.2, September 2013.

[13] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.

[14] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, September 2013.

[15] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.1, 2013.

noise level as the wall can reflect noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a larger barrier.[16] Additionally, structures with closed windows can further attenuate exterior noise by a minimum of 20 dBA to 30 dBA.[17]

Receptors located downwind from a noise source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels.[18] Atmospheric temperature inversion (i.e., increasing temperature with elevation) can increase sound levels at long distances. Other factors, such as air temperature, humidity, and turbulence can, under the right conditions, also have substantial effects on noise levels.[19]

e) Vibration Fundamentals

Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Since energy is lost during its transfer from one particle to another, vibration becomes less perceptible with increasing distance from the source.

As described in the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual*, groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard.[20] In contrast to airborne noise, groundborne vibration is not a common environmental problem, as it is unusual for vibration from sources, such as rubber-tired buses and trucks, to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains, heavy trucks traveling on rough roads, and certain construction activities, such as blasting, pile-driving, and operation of heavy earth-moving equipment.[21] Groundborne vibration generated by man-made activities (e.g., road traffic, construction operations) typically weakens with greater horizontal distance from the source of the vibration.

16 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Sections 2.1.4.24 and 5.1.1, September 2013.

17 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 7.4.2, Table 7-1, September 2013.

18 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.

19 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.1.4.3, September 2013.

20 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.

21 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 7, 2018.

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec) and is most frequently used to describe vibration impacts to buildings.[22] The root mean square (RMS) amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body.[23] Decibel notation (VdB) is commonly used to express RMS vibration velocity amplitude. The relationship of PPV to RMS velocity is expressed in terms of the "crest factor," defined as the ratio of the PPV amplitude to the RMS amplitude. PPV is typically a factor of 1.7 to 6 times greater than RMS vibration velocity; FTA uses a crest factor of 4.[24] The decibel notation VdB acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause damage (especially older masonry structures), locations where people sleep, and locations with vibration sensitive equipment.[25]

Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.[26] The relationship between groundborne vibration and groundborne noise depends on the frequency of the vibration and the acoustical absorption characteristics of the receiving room. For typical buildings, groundborne vibration that causes low frequency noise (i.e., the vibration spectrum peak is less than 30 Hz) results in a groundborne noise level that is approximately 50 decibels lower than the velocity level. For groundborne vibration that causes mid-frequency noise (i.e., the vibration spectrum peak is between 30 and 60 Hz), the groundborne noise level will be approximately 35 to 37 decibels lower than the velocity level.[27] Therefore, for typical buildings, the groundborne noise decibel level is lower than the groundborne vibration velocity level at low frequencies.

2. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines applicable to the Proposed Project regarding noise at the federal, State, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

22 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
23 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
24 Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual, Section 5.1, 2018.
25 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Sections 6.1, 6.2, and 6.3, 2018.
26 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Section 5.4, 2018.
27 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-3 and Table 6-14, September 2018.

- Noise Control Act of 1972
- Federal Transportation Administration Vibration Standards
- Occupational Safety and Health Act of 1970
- Office of Planning and Research Guidelines for Noise Compatible Land Use
- City of Santa Monica General Plan Noise Element
- City of Santa Monica Municipal Code

a) Federal

1) Noise Control Act of 1972

Under the authority of the Noise Control Act of 1972, the United States Environmental Protection Agency (USEPA) established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, USEPA issued guidance levels for the protection of public health and welfare in residential areas of an outdoor L_{dn} of 55 dBA and an indoor L_{dn} of 45 dBA.[28] These guidance levels are not standards or regulations and were developed without consideration of technical or economic feasibility. There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Proposed Project. Moreover, the federal noise standards are not reflective of urban environments that range by land use, density, proximity to commercial or industrial centers, etc. As such, for purposes of determining acceptable sound levels and evaluate intrusive noise sources and increases, this section utilizes the City of Santa Monica Noise Regulations, as discussed in further detail below.

2) Federal Transit Administration Vibration Standards

There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from land use development projects, such as the Proposed Project. However, the FTA has adopted vibration criteria for use in evaluating vibration impacts from construction activities, as presented in its Transit Noise and Vibration Impact Assessment Manual.[29] The vibration damage criteria adopted by the FTA are shown in Table IV.G-1, *Construction Vibration Damage Criteria*.

[28] U.S. Environmental Protection Agency, EPA Identifies Noise Levels Affecting Health and Welfare, 1974.

[29] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-5, page 186, 2018.

Table IV.G-1
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, 2018.

The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from ground-borne noise on the following three off-site land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.[30] The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses, such as schools, churches, other institutions, and quiet offices, that do not have vibration-sensitive equipment but that still potentially involve activities that could be disturbed by vibration. The vibration thresholds associated with human annoyance for these three land-use categories are shown in Table IV.G-2, *Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment*. No thresholds have been adopted or recommended for commercial or office uses.

[30] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 6-1, page 124, 2018.

Table IV.G-2
Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment

Land Use Category	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

NOTES:

[a] "Frequent Events" is defined as more than 70 vibration events of the same source per day.

[b] "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

[c] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.

[d] This criterion is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes.

SOURCE: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.

3) Occupational Safety and Health Act of 1970

Under the Occupational Safety and Health Act of 1970 (29 United States Code [USC] Sections 1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.[31]

[31] United States Department of Labor, Occupational Safety and Health Act, 1970.

b) State

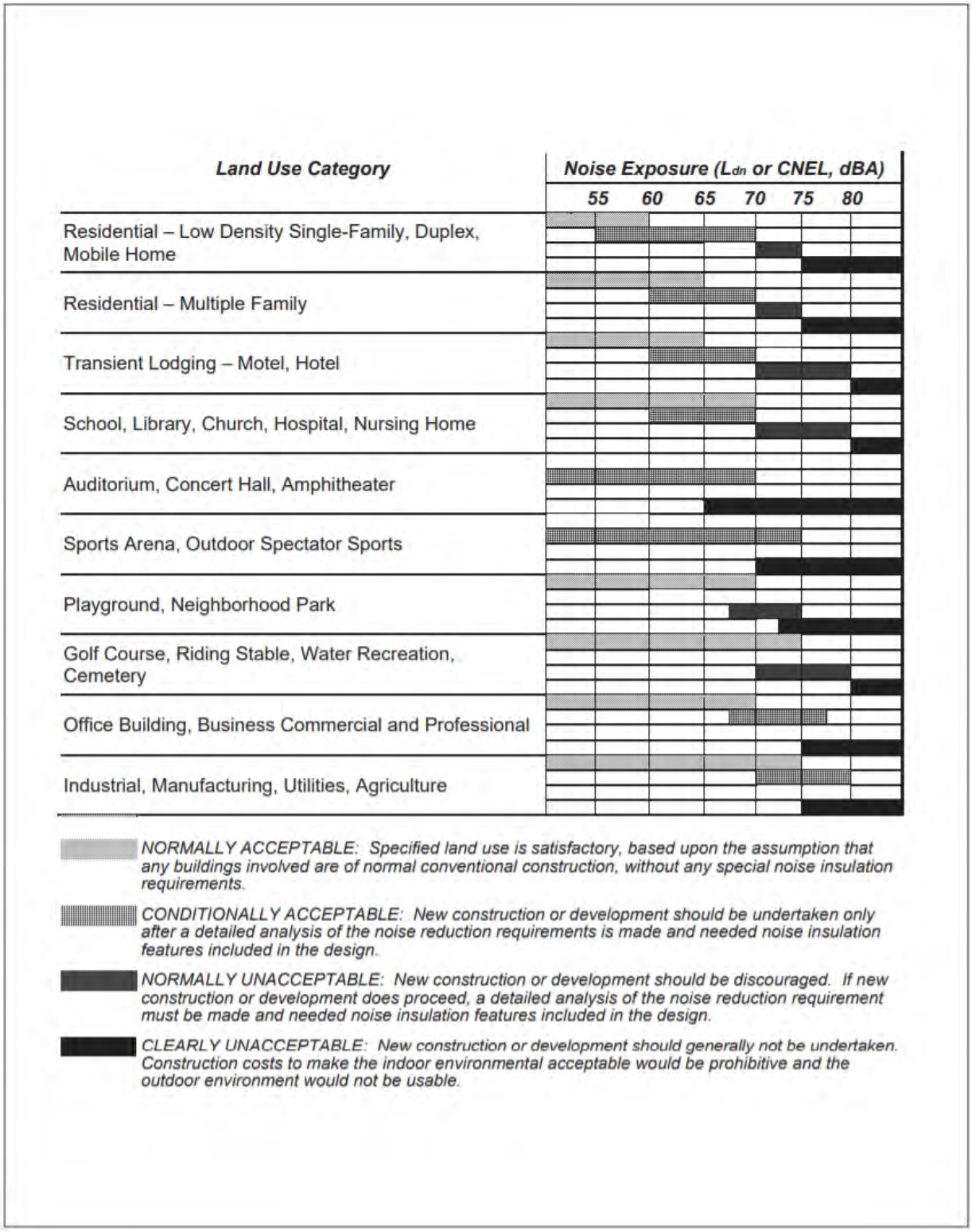
1) Office of Planning and Research Guidelines for Noise Compatible Land Use

The State of California has not adopted Statewide standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure, as presented in Figure IV.G-2, *Guidelines for Noise Compatible Land Use*.[32] The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise levels are divided into four general categories, which vary in range according to land use type: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." The City of Santa Monica (City) has developed its own compatibility guidelines in the Noise Element of the General Plan based in part on OPR Guidelines. California Government Code Section 65302 requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(f) requiring a noise element to be included in the general plan. The noise element must identify and appraise noise problems in the community and analyze and quantify current and projected noise levels.

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards (CALGreen) Code. The CALGreen Code noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Projects may use either the prescriptive method (CALGreen Code Section 5.507.4.1) or the performance method (CALGreen Code Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA L_{eq}(1hr).

[32] State of California, Governor's Office of Planning and Research, General Plan 2017 Guidelines, page 377, 2017.

Figure IV.G-2 Guidelines for Noise Compatible Land Use



Source: State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003.

c) Local

1) City of Santa Monica General Plan Noise Element

The Noise Element of the City's General Plan policies includes the CNEL guidelines for land use compatibility and includes a number of goals and policies for land use planning purposes. The overall purpose of the implementation of the Noise Element is to (1) where feasible, provide for the reduction of noise where the noise environment is unacceptable, (2) protect and maintain those areas having acceptable noise environments, and (3) provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions .[33] The following policies from the Noise Element apply to the Proposed Project.

- **Policy 2**: Incorporate noise considerations into land use planning decisions (as they apply to finished projects, not construction actions). These measures will be achieved through the following programs:
    - Establish acceptable limits of noise for various land uses throughout the community. Zoning changes should be consistent with the compatibility of the projected noise environment.
    - Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other noise sensitive areas.
    - Encourage acoustical mitigation design in new construction.

- **Policy 3:** Develop measures to control non-transportation noise impacts.
    - Adopt a revised Community Noise Ordinance to mitigate noise conflicts.
    - Improve enforcement of required noise mitigation measures in building design.
    - Establish and maintain coordination among the City agencies involved in noise abatement.

- **Policy 4**: The City shall develop measures to control construction noise impacts.

Table 1 of the Noise Element also contains guidelines for noise compatible land uses.[34] After adoption of the Noise Element, Santa Monica duly adopted a Noise Ordinance that includes standards and criteria for both finished projects and construction noise.

[33] City of Santa Monica, Noise Element, Page 15, 1992.

[34] City of Santa Monica, General Plan, Noise Element, Page 14, 1992.

2) City of Santa Monica Municipal Code

The City of Santa Monica Noise Regulations are provided in Chapter 4 of the Santa Monica Municipal Code (SMMC). The SMMC and the City's Noise Ordinance (SMMC Section 4.12) contain a number of regulations that would apply to the Proposed Project's temporary construction activities and long-term operations.

Section 4.12.030 – Exemptions

a) The following activities shall be exempt from the provisions of City's Noise Ordinance:

   1) Activities conducted on public or private school grounds, including, but not limited to, school athletic and school entertainment events.

Section 4.12.050 – Designated Noise Zones

Noise Zone I. All property in a residential district established by Santa Monica Municipal Code Section 9.02.010(B)(1) or any revisions thereto; except, however, the Santa Monica Pier shall be excluded from this noise zone.

Noise Zone II. All property in a nonresidential district established by Santa Monica Municipal Code Section 9.02.010(B)(2) or any revisions thereto; except, however, the industrial conservation district shall be excluded from this noise zone and the Santa Monica Pier shall be included in this noise zone.

Noise Zone III. All property in the industrial conservation district as established by Santa Monica Municipal Code Section 9.02.010(A). (Added by Ord. No. 2115CCS § 1, adopted 2/24/04; amended by Ord. No. 2679CCS § 3, adopted 8/24/21)

Section 4.12.060 – Exterior Noise Standards

(a) The following noise standards, unless otherwise specifically indicated, shall apply to all property with a designated noise zone during the times indicated below.

Table IV.G-3
City of Santa Monica Exterior Noise Standards

Noise Zone	Time Interval	Allowable L_{eq}	
		15-minute continuous measurement period	5-minute continuous measurement period
I	Monday – Friday 10 p.m. to 7 a.m. 7 a.m. to 10 p.m. Saturday and Sunday 10 p.m. to 8 a.m. 8 a.m. to 10 p.m.	 50 dBA 60 dBA 50 dBA 60 dBA	 55 dBA 65 dBA 55 dBA 65 dBA
II	All days of week 10 p.m. to 7 a.m. 7 a.m. to 10 p.m.	 60 dBA 65 dBA	 65 dBA 70 dBA
III	Anytime	70 dBA	75 dBA

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

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

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

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

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

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

Section 4.12.070 – Vibration

Notwithstanding other Sections of this Chapter, it shall be unlawful for any person to create, maintain or cause any ground vibration that is perceptible without instruments at any point on any property. For the purpose of this Chapter, the perception threshold shall be presumed to be more than 0.05 inches per second RMS velocity. The vibration caused by construction activity, moving vehicles, trains, and aircraft shall be exempt from this Section. (Added by Ord. No. 2115CCS § 1 (part), adopted 2/24/04).

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

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

(1) Before 8 a.m. or after 6 p.m. on Monday through Friday, except that construction activities conducted by employees of the City of Santa Monica or public utilities while conducting duties associated with their employment shall not occur before 7 a.m. or after 6 p.m. on Monday through Friday;

(2) Before 9 a.m. or after 5 p.m. on Saturday;

(3) All day on Sunday;

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

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

(1) The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of this Chapter, for the noise zone where the measurement is taken, plus 20 dBA, or

(2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of this Chapter for the noise zone where the measurement is taken plus 40 dBA, for any period of time.

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

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

(2) Construction activities such as 24-hour pumping, excavation or demolition;

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

(d) Any construction that exceeds the noise levels established in subsection (b) of this Section shall occur between the hours of 10 a.m. and 3 p.m., Monday through Friday.

(e) A permit may be issued authorizing construction activity during the times prohibited by this Section whenever it is found to be in the public interest. The person obtaining the permit shall provide notification to persons occupying property within a perimeter of five hundred feet of the site of the proposed construction activity prior to commencing work pursuant to the permit. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit. Applications for such permit shall be in writing, shall be accompanied by an application fee and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the Building Officer. No permit shall be issued unless the application is first approved by the Director of Environmental and Public Works Management, the Building Officer, the Chief of Police and the Director of Planning and Community Development. The City Council shall establish by resolution fees for the filing and processing of the application required by this subsection (e) and any required compliance monitoring. This fee may be revised from time to time by resolution of the City Council. (Added by Ord. No. 2115CCS § 1 (part), adopted 2/24/04).

Section 4.12.120 – Posting of Construction Signs

(a) There shall be displayed at every site covered by this Chapter where work activities requiring a City permit are being conducted, a sign in English and Spanish reading substantially as follows: “Attention All Employees and Subcontractors. Santa Monica construction/demolition work times are: Monday through Friday, 8:00 a.m. until 6:00 p.m.; Saturday 9:00 a.m. until 5:00 p.m.; Sundays and holidays, no work permitted.” In addition, the sign shall indicate the City telephone numbers where violations of this Section can be reported, the location of the job site, and the permit number issued authorizing the work.

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

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

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

(e) This Section shall apply to construction pursuant to any building permit issued after the effective date of the ordinance codified in this Chapter. (Added by Ord. No. 2115CCS § 1 (part), adopted 2/24/04).

Section 4.12.130 – Location, screening and noise measurements of mechanical equipment.

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

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

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

3. Existing Conditions

The Project Site is located in an urbanized area and operation of the existing and ongoing campus activities contributes to the ambient noise levels in the vicinity. Ambient noise sources in the vicinity of the Project Site include general operation activities associated with the SMC Main Campus, including but not limited to student activities, vehicle traffic and parking, and special events and crowd-related noise at Corsair stadium. Ambient noise levels are also influenced by adjacent residential and commercial land uses, vehicular traffic on area roadways and on-street parking. Collectively, these noise sources contribute to ambient noise levels in the baseline condition.

a) Sensitive Receptors

Some land uses are considered more sensitive to noise than others due to the types of activities typically involved at the receptor location, and the effect that noise can have on those activities and the persons engaged in them. Residences, schools, transient lodging, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks can be considered sensitive receptors for noise analyses. The Santa Monica Noise Element defines noise sensitive land uses as public and private schools, day care centers, and rest homes. Chapter 4.12 of the SMMC defines noise sensitive land uses as public or private schools, places of worship, cemeteries, libraries, hospitals and similar health care institutions. These uses are generally considered more sensitive to noise than commercial and industrial land uses.

The Project Site consists of SMC's Main Campus, which is considered a noise sensitive receptor. Within the Main Campus the students and faculty could be exposed to construction and operational noise impacts. Based on a review of the land uses in the vicinity of the Project Site, off-site noise sensitive receptors that have the potential to be impacted by the Proposed Project include residences, churches, schools, a motel, and a cemetery. The sensitive receptors and their approximate distance to each phase of Proposed Project construction are identified in Table IV.G-4, *Description of Sensitive Receptors,* below.

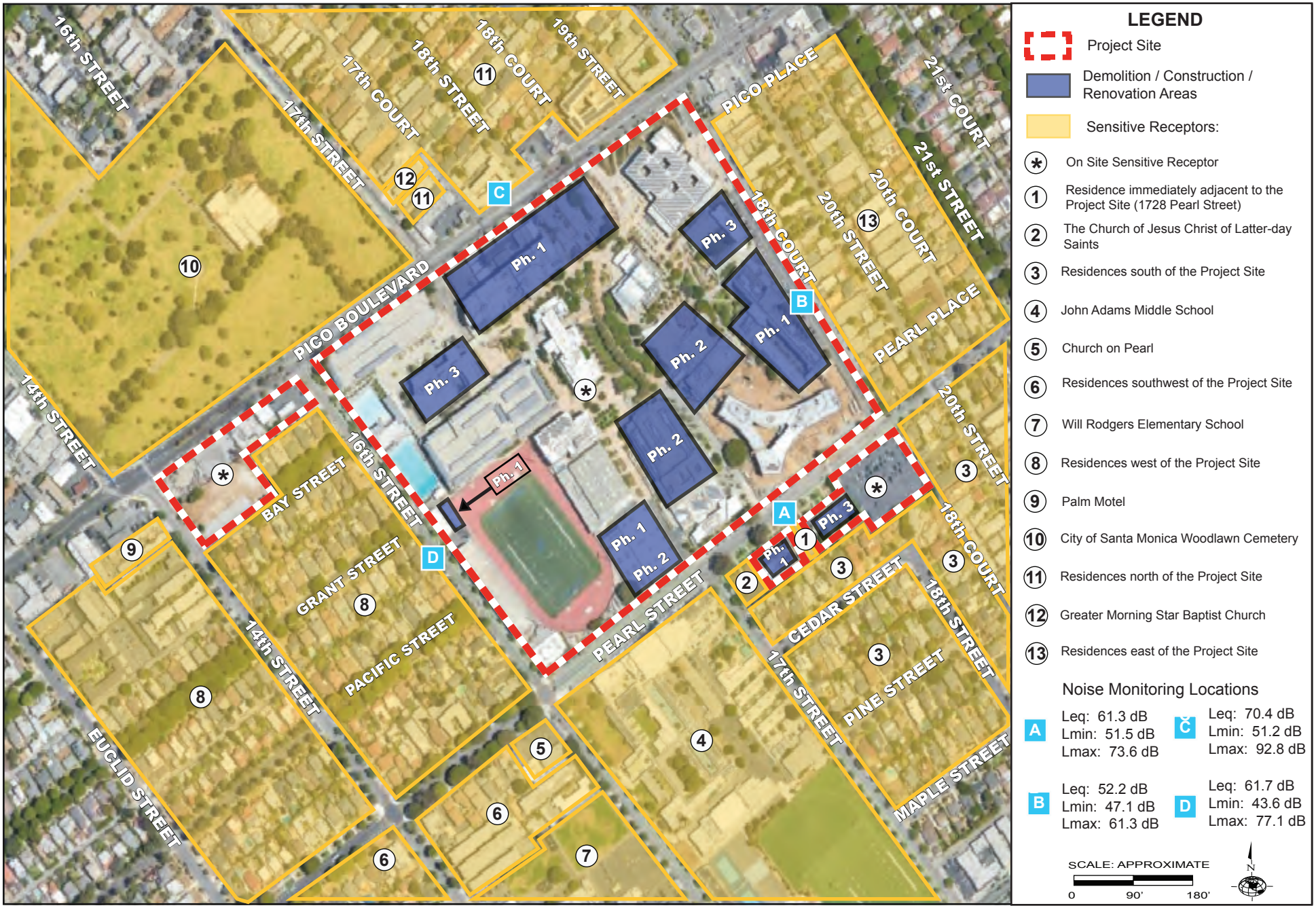
Table IV.G-4
Description of Sensitive Receptors

Receptor Location[a]	Description	Distance of Sensitive Receptor to Construction Sites (D1 / D2 in feet)[b]		
		Phase 1	Phase 2	Phase 3
On-Site Sensitive Receptor				
*	SMC Main Campus (Project Site)	--	--	--
Off-Site Sensitive Receptors				
1	Residence immediately adjacent to the Project Site	1 / 45	340 / 475	1 / 75
2	The Church of Jesus Christ of Latter-day Saints	1 / 45	120 / 260	150 / 230
3	Residences south of the Project Site	1 / 75	240 / 375	1/ 75
4	John Adams Middle School	90 / 200	90 / 140	355 / 445
5	Church on Pearl	440 / 580	100 / 175	1,000/1,080
6	Residences west of the Project Site	550 / 700	190 / 265	1,135/1,215
7	Will Rodgers Elementary School	580 / 750	400 / 450	1,000/1,080
8	Residences west of the Project Site	45 / 100	45 / 100	190 / 335
9	Palm Motel	920 /1,060	950 / 1,000	880 / 975
10	City of Santa Monica Woodlawn Cemetery	95 / 400	750 / 950	250 / 340
11	Residences north of the Project Site	170 / 340	585 /750	355 / 475
12	Greater Morning Star Baptist Church	215 / 410	795 / 995	388 / 510
13	Residences east of the Project Site	370 / 450	280/ 400	90 /200

Notes:
[a] See Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.
[b] The distance for D1 is measured from the property line of the receptor to the nearest point of the construction site area. The distance for D2 is measured from the property line of the receptor to the center of the construction site.
Source: Parker Environmental Consultants, 2025.

b) Existing Daytime Noise Levels

To establish baseline noise conditions, existing daytime noise levels were measured at four off-site receptor locations that are representative of sensitive uses in the vicinity of the Project Site (See Monitoring Locations A-D in Figure IV.G-3). These noise measurement locations were selected to provide representative baseline measurements for the noise-sensitive uses in the vicinity of the Project Site. The measurement locations provide an adequate basis to evaluate potential impacts at the measurement locations and at other sensitive receptors located beyond the measurement location in the same direction from the Project Site.



Source: Google Earth, Aerial View, 2022.

Figure IV.G-3
Noise Monitoring and Sensitive Receptor Map

The noise measurements were conducted on Thursday, April 18, 2024 between approximately 11:30 A.M. and 1:00 P.M. using a Larson-Davis 831 precision sound level meter (SLM).35 The noise measurements are provided in Appendix F to this EIR. For each measurement the microphone was placed at a height of approximately five feet above grade level, which is consistent with standard protocol for conducting community noise measurements. The sound level meter was programmed to record the average continuous sound level (L_{eq}) over a period of 15 minutes in accordance with SMMC Chapter 4.12. The results of the measurements are summarized in Table IV.G-5, *Description of Noise Measurement Locations*, below. As shown in Table IV.G-5, the ambient recorded noise levels range from 52.2 dBA L_{eq} (at Noise Monitoring Location B) to 70.4 dBA L_{eq} (at Noise Monitoring Location C). Based on field observations, the current ambient noise at the measurement locations is dominated by local roadway traffic.

Table IV.G-5
Description of Noise Measurement Locations

Measurement Location	Location	Primary Noise Sources	Noise Level Statistics [a]		
			L_{eq}	L_{min}	L_{max}
A	On the south side of Pearl Street, adjacent to the SMC Pearl Street properties	Vehicle traffic, pedestrians, construction of the Math and Science building on the Project Site	61.3	51.5	73.6
B	Along the eastern border of the Project Site	Vehicle traffic, pedestrians, helicopter, engines starting and idling, construction of the Math and Science building on the Project Site	52.2	47.1	94.1
C	On the north side of Pico Boulevard	Vehicle traffic, pedestrians, buses, motorcycles	70.4	51.2	92.8
D	On the west side of 16th Street	Vehicle traffic, pedestrians	61.7	43.6	77.1

Notes:
[a] *Noise measurements were taken on Thursday, April 18, 2024 at each location for a duration of 15 minutes. See Appendix F of this EIR for noise monitoring data sheets.*

c) Existing Groundborne Vibration Levels

Based on field observations during the noise measurements, the primary sources of existing groundborne vibration near the Project Site include heavy-duty (e.g., refuse trucks and delivery trucks) vehicles on local roadways. According to the FTA Transit Noise and Vibration Impact Assessment Manual, typical road traffic-induced vibration levels are unlikely to be perceptible by people. Specifically, the FTA study reports that "[i]t is unusual for vibration from sources such

[35] This sound meter meets the minimum industry standard performance requirements for "Type 1" standard instruments as defined in the American National Standard Institute (ANSI) S1.4 and complies with the requirements specified in LAMC Section 111.01(I) that the instruments be "Type S2A" standard instruments or better and was calibrated and operated according to the manufacturer's written specifications.

as buses and trucks to be perceptible, even in locations close to major roads."[36] Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road. Pursuant to the FTA Transit Noise and Vibration Impact Assessment Manual, 75 VdB is the dividing line between barely perceptible (with regards to ground vibration) and distinctly perceptible.[37] Therefore, existing ground-borne vibration in the vicinity of the Project Site is generally below the perceptible level.

C. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project would have a significant impact on noise if it would result in:

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

Threshold b): Generation of excessive groundborne vibration or groundborne noise levels; or

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

With respect to addressing Threshold a), above, the following analysis utilizes the performance noise level standards as identified in the City Noise Ordinance (SMMC Chapter 4.12), as appropriate, to inform certain impact analyses. For purposes of addressing construction noise impacts, a project would normally have a significant impact on noise levels from construction to off-site sensitive receptors if:

a) On-site construction activities cause the resultant noise level of any activity "to exceed the exterior noise standards defined in Section 4.12.060 (see Table IV.G-3, above) or the existing ambient noise level, if higher than the exterior noise standards plus 20 dBA (average hourly equivalent noise level) or greater, or

[36] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018 (at p. 112).
[37] Ibid.

b) On-site construction activities cause the resultant noise level of any activity "to exceed the exterior noise standards defined in Section 4.12.060 (see Table IV.G-3, above) or the existing ambient noise level, if higher than the exterior noise standards plus 40 dB (maximum noise level) or greater at the off-site noise-sensitive receptors between 8:00 a.m. to 10:00 a.m. or 3:00 p.m. to 6:00 p.m. on Monday through Friday, or between 9:00 a.m. to 10:00 a.m. or 3:00 p.m. to 5:00 p.m. on Saturday.

A project would normally have a significant impact on noise levels from construction to on-site sensitive receptors if:

a) The CALGreen nonresidential interior space threshold of 50 dBA is exceeded.

A project would normally have a significant impact on noise levels from project operations if:

a) The Project-related roadway noise causes the ambient noise levels measured at the property line of affected off-site noise-sensitive uses to increase by 5 dBA in CNEL or greater; or
b) The Project-related on-site operational noise sources, such as building mechanical/electrical equipment, outdoor activities, loading, trash compactor, or parking facilities, causes the existing ambient noise levels to exceed the exterior noise standards defined in Section 4.12.060 of the SMMC (See Table IV.G-3, above), or the existing ambient noise level, if higher than the exterior noise standards plus 3 dBA or greater at off-site noise-sensitive uses.

4. Ground-borne Vibration Standards and Guidelines

Section 4.12.070 of the SMMC establishes a vibration perception threshold of more than 0.05 in/sec RMS velocity. The City of Santa Monica exempts vibration caused by construction activity as well as moving vehicles from the requirements of Section 4.12.070. Therefore, for the purposes of providing recognized significance thresholds for construction vibration activities, based on the FTA's Construction Vibration Damage Criteria (see Table IV.G-1, above) a project would have the potential to result in a significant impact if:

a) The Project's construction activities cause groundborne vibration levels to exceed the vibration potential for building damage of 0.2 PPV (in/sec) as applicable for non-engineered timber and masonry buildings.

For purposes of addressing operational vibration impacts, the Proposed Project would result in a significant impact if:

b) The Project's operational activities cause groundborne vibration levels to exceed the City's vibration perception threshold of 0.05 in/sec in RMS velocity.

Methodology

The Proposed Project's potential noise and construction vibration impacts were evaluated with respect to impacts upon noise-sensitive land uses identified within the Project area. Specifically, the noise impact analysis addresses potential construction-related noise impacts that would occur on a short-term basis during the construction period and the long-term operational impacts that would occur over the life of the Proposed Project. The following presents the methodology for each aspect of the analysis.

1. Construction Impacts

a) On-Site Construction Noise

Construction noise impacts were evaluated by calculating the construction activity noise levels at representative sensitive receptor locations in the vicinity of the Project Site and comparing the estimated construction noise levels to the existing ambient noise measurements recorded in proximity to the same receptors.

Construction noise levels are based on the proposed development's anticipated construction equipment inventory, construction activities for each phase of construction, the usage factor for each piece of equipment, and the anticipated construction schedule. Noise from construction equipment is based on construction equipment noise levels as published by the FHWA's RCNM.[38] (See Table IV.G-6, *Noise Data for Selected Construction Equipment*, below). The list of construction equipment was compared to industry standard reference databases, including the FHWA Highway Construction Noise Handbook (2006), for equipment typical to projects of this scale. The listed noise levels do not include the effects of any noise mitigation measures. Although in practice, not all of the equipment utilized during a single phase would be operated simultaneously, to provide for a conservative estimate, the construction noise calculations are based on the two loudest sources of construction equipment involved in each phase operating simultaneously as measured from the center of the active construction site.[39] The projected noise levels where then compared to the ambient noise levels identified in Table IV.G-5, *Description of Noise Measurement Locations*, to determine whether the construction noise levels would exceed the applicable threshold levels upon nearby sensitive receptors for both hourly average noise levels (L_{eq}), and maximum instantaneous noise levels (L_{max}).

[38] Federal Highway Administration, Roadway Construction Noise Model, Users Guide, Final Report, January 2006, https://www.fhwa.dot.gov/Environment/noise/construction_noise/rcnm/rcnm.pdf. Accessed January 2025.

[39] The FTA Noise and Vibration Assessment Manual (2018) recommends adding only the two noisiest pieces of equipment expected to be used in each phase of construction (Section 5.2 at page 178).

Table IV.G-6
Noise Data for Selected Construction Equipment

Construction Equipment	Phase(s) of Construction	Estimated Usage Factor %	Actual Measured Noise Level at 50 Feet (dBA L_{max})
Concrete/Industrial Saw	Demolition	20	90
Excavator	Demolition, Grading/Excavation	40	81
Rubber Tired Dozer	Demolition, Grading/Excavation	40	82
Tractor/Loader/Backhoe	Demolition, Grading/Excavation, Building Construction	40	85
Paver	Paving	50	77
Paving Equipment	Paving	50	77
Roller	Site Clearing, Building Construction, Paving	20	80
Grader	Grading/Excavation	40	85
Scraper	Grading/Excavation	40	84
Crane	Building Construction	16	81
Forklift	Building Construction	20	75
Generator Set	Building Construction	50	81
Welder	Building Construction	40	74
Aerial Lift	Architectural Coating/Finishing	20	75
Air Compressor	Architectural Coating/Finishing	40	78
Source: FHWA Highway Construction Noise Handbook Final Report, Table 9.1, August 2006.			

The construction noise calculations at each receptor location incorporated a standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance (as described above in Subsection (1)(a), Fundamentals of Sound and Environmental Noise). Additional noise attenuation was assigned to receptor locations where the line-of-sight to the Project Site was interrupted by the presence of any existing intervening structures.

b) Groundborne Vibration

Ground-borne vibration impacts due to the Proposed Project's construction activities are exempt per SMMC 4.12.070. Therefore, no further analysis of groundborne vibration impacts for human annoyance was warranted.

For purposes of addressing groundborne vibration impacts for structural vibration damage, this analysis utilizes the guidance and methodology identified in the FTA's Transit Noise and Vibration Impact Assessment Manual.[40] The vibration source levels from construction equipment were based on the standard construction equipment and PPV reference levels at 25 feet.[41] The propagation adjustment for distance was then quantified based on the distance

[40] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, at pp 184-185.

[41] Ibid, at Table 7-4 on page 184.

between the vibration source and the building footprint of each sensitive receptor.[42] These vibration values were then compared to the applicable construction vibration damage criteria thresholds identified in Table IV.G-1, above.

c) Off-Site Construction Noise

Noise impacts for off-site construction noise were qualitatively assessed by comparing the estimated number of haul trips generated by the Proposed Project with that of the ambient noise levels and existing traffic volume along the Proposed Project's anticipated haul route(s). For purposes on this analysis, the hauling activity noise impacts were based on the following assumptions.

- For Phase 1, demolition would involve the demolition of approximately 286,616 gsf of building floor area, resulting in approximately 17 one-way haul trips per day over approximately 196 days. It is estimated that Phase 1 would require up to 4,000 cubic yards (cy) of soil export generating approximately 8 one-way haul trips per day for a period of approximately 65 days.
- Phase 2 would involve the demolition of approximately 176,673 gsf of building floor area, resulting in 31 one-way haul trips a day over approximately 65 days. Grading for Phase 2 would generate 3,000 cy of soil export resulting in approximately 16 one-way haul trips per day for a period of approximately 23 days.
- Phase 3 would involve the demolition of approximately 80,789 gsf of building floor area, resulting in 14 one-way haul trips a day over approximately 66 days. Grading for Phase 3 would require up to 3,000 cy of soil export generating approximately 18 one-way haul trips per day for a period of approximately 21 days.

2. Operational Impacts

a) Roadway Noise Impacts

With respect to roadway noise impacts, in order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3-dBA increase in ambient noise to occur.

As discussed in Section II, Project Description, the Proposed Project would result in a net decrease of 94,884 gsf of floor area on the Main Campus. The Main Campus currently has a total of 2,860 parking spaces within the surface parking lots and parking structures to accommodate the existing uses. The Proposed Project does not propose any changes to the on-site parking or vehicle circulation plan. Therefore, since the Proposed Project would not generate an increase in vehicle trips and would not result in any changes to the existing parking plan, the Proposed Project would not have the potential to generate an increase in roadway

[42] Ibid, at Eq-7-2 on page 185.

noise impacts. As such, no further analysis of roadway noise impacts is required.

b) Stationary Noise Impacts

On-site stationary point-source noise impacts such as building mechanical equipment, loading area activity, and activities anticipated to occur within accessible outdoor open space areas, were evaluated by comparing such noise levels to the ambient noise levels to determine significance.

c) Operational Vibration Impacts

The Proposed Project does not propose any new operational sources of vibration, such as vehicular traffic, and loading and refuse trucks, or vibratory equipment, above and beyond what may already be occurring within standard campus operations. As such, no further analysis of operational vibration impacts is warranted.

D. Project Impacts

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 Project area in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

1. Impact Analysis

a) Construction Noise

1) Hourly Average Construction Noise Levels

Construction of the Proposed Project would require demolition, earthwork, building construction, and renovation activities that would generate noise on a temporary and intermittent basis throughout the duration of the construction process. As discussed in Section II, Project Description, construction is anticipated to occur in three separate phases over an approximate 10-year period. It is assumed that all construction activity would occur within the permissible hours of construction pursuant to SMMC Section 4.12 (i.e., between 8 a.m. and 6 p.m. on Monday through Friday, and 9 a.m. to 5 p.m. on Saturday). Any activities outside these hours would require approval from the SMC Board of Trustees. No construction would occur on Sundays.

2) Off-Site Sensitive Receptors

Construction noise impacts were quantified for the hourly average noise levels during construction for each phase of construction at 13 off-site sensitive receptor locations identified within the study area. As shown in Table IV.G-7, *Phase 1 – Average (Hourly) Construction Noise Levels Without Mitigation,* construction noise levels during Phase 1 construction activities would generate a less than 20 dBA L_{eq} noise increase above ambient noise levels at Sensitive Receptors 4 through 13. As such, noise impacts at these sensitive receptors would be less than significant without mitigation. However, Phase 1 construction noise would potentially exceed the City's construction noise thresholds of 20 dBA L_{eq} above ambient noise levels at Sensitive Receptors 1, 2 and 3. Without mitigation, the maximum noise levels at these receptors would range from approximately 81.3 to 85.7 dBA, which is 4.4 dBA above the City's construction noise threshold at Sensitive Receptors 1, and 2, and at the noise threshold for Sensitive Receptor No. 3. The exceedance in noise levels at these receptors is directly associated with the proximity of Sensitive Receptors 1 through 3 to the proposed Campus Police Headquarters building to be constructed during Phase 1. As construction noise impacts would equal or exceed the level of significance at 3 of the 13 off-site sensitive receptors analyzed, construction noise impacts would result in a potentially significant noise impact prior to mitigation during Phase 1.

Table IV.G-7
Phase 1 – Average (Hourly) Construction Noise Levels Without Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA L_{eq}) by Phase [c]					Maximum Const. Noise Level (dBA L_{eq})	Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	85.7	84.5	83.9	76.9	77.9	85.7	81.3	**Yes**
2	61.3	85.7	84.5	83.9	76.9	77.9	85.7	81.3	**Yes**
3	61.3	81.3	80.0	79.5	72.5	73.5	81.3	81.3	**Yes**
4	61.3	72.7	71.5	48.7	41.7	42.7	72.7	81.3	No
5	61.3	63.5	62.3	37.9	30.9	31.9	63.5	81.3	No
6	61.3	61.9	60.6	37.8	30.8	31.8	61.9	81.3	No
7	61.3	51.3	50.0	37.7	30.7	31.7	51.3	81.3	No
8	61.7	78.8	77.5	38.8	31.8	68.1	78.8	81.7	No
9	61.7	38.3	37.0	34.1	27.1	32.8	38.3	81.7	No
10	70.4	66.7	65.5	65.0	58.0	59.0	66.7	90.4	No
11	70.4	58.1	56.9	56.4	49.4	59.0	59.0	90.4	No
12	70.4	46.5	45.3	44.8	37.7	38.8	46.5	90.4	No
13	52.2	55.7	54.5	53.9	46.9	47.9	55.7	72.2	No

Notes:
[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*
[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*
[d] *The threshold of significance is measured daytime ambient noise levels plus 20 dBA per the SMMC Chapter 4.12.*
Source: Parker Environmental Consultants, 2025.

As shown in Table IV.G-8, *Phase 2 – Average (Hourly) Construction Noise Levels Without Mitigation,* below, construction noise impacts during Phase 2 construction activities would not exceed the applicable thresholds of significance for any phase of construction prior to mitigation. It should be noted that the buildings constructed in Phase 1 and the remaining surrounding buildings on the Main Campus effectively block the line-of-sight between the active construction areas of Phase 2 and Sensitive Receptors 3, 6, 7 and 9 through 13, resulting in increased sound attenuation between the noise sources and the sensitive receptors. The resulting maximum hourly construction noise levels during Phase 2 would range from approximately 38.8 dBA L_{eq} to 78.8 dBA L_{eq}, resulting in a less than 20 dBA L_{eq} increase over ambient noise levels at all 13 off-site sensitive receptors. As such, construction noise during Phase 2 construction activities would be less than significant prior to mitigation.

Table IV.G-8
Phase 2 – Average (Hourly) Construction Noise Levels Without Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]					Maximum Const. Noise Level (dBA L_{eq})	Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	61.5	64.0	63.5	56.5	57.5	64.0	81.3	No
2	61.3	65.7	66.1	68.7	61.7	62.7	68.7	81.3	No
3	61.3	44.4	61.7	65.5	58.5	59.5	65.5	81.3	No
4	61.3	75.8	74.6	71.0	64.0	65.0	75.8	81.3	No
5	61.3	73.9	72.7	61.7	54.7	55.7	73.9	81.3	No
6	61.3	70.3	69.1	60.2	53.2	54.2	70.3	81.3	No
7	61.3	55.7	54.5	49.5	42.5	43.5	55.7	81.3	No
8	61.7	78.8	77.5	62.5	55.5	56.5	78.8	81.7	No
9	61.7	38.8	37.5	34.3	27.3	28.3	38.8	81.7	No
10	70.4	39.2	38.0	37.5	30.4	31.5	39.2	90.4	No
11	70.4	41.3	40.0	39.5	32.5	33.5	41.3	90.4	No
12	70.4	38.8	37.6	37.1	30.0	31.1	38.8	90.4	No
13	52.2	46.7	45.5	45.0	38.0	39.0	46.7	72.2	No

Notes:

[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*

[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*

[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*

[d] *The threshold of significance is measured daytime ambient noise levels plus 20 dBA per the SMMC Chapter 4.12.*

Source: Parker Environmental Consultants, 2025.

As shown in Table IV.G-9, *Phase 3 – Average (Hourly) Construction Noise Levels Without Mitigation,* below, the maximum hourly construction noise impacts during Phase 3 would range from approximately 39 dBA L_{eq} to 81.3 dBA L_{eq}, potentially exceeding the applicable noise impact thresholds at Sensitive Receptors 1, 3, and 13 during demolition activities. Construction noise levels would be less than significant at all other sensitive receptors analyzed. Sensitive Receptors 1 and 3 would primarily be impacted by the demolition of SMC's Pearl Street properties. Sensitive Receptor 13 would potentially be significantly impacted by the demolition of the Art Complex Building. As construction noise impacts would equal or exceed the level of significance at 3 of the 13 off-site sensitive receptors analyzed, construction noise impacts would result in a potentially significant noise impact prior to mitigation during Phase 3.

Table IV.G-9
Phase 3 – Average (Hourly) Construction Noise Levels Without Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]					Maximum Const. Noise Level (dBAL_{eq})	Const. Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	81.3	80.0	79.5	72.5	73.5	81.3	81.3	**Yes**
2	61.3	61.5	60.3	59.8	52.8	53.8	61.5	81.3	No
3	61.3	81.3	80.0	79.5	72.5	73.5	81.3	81.3	**Yes**
4	61.3	55.8	54.6	54.0	47.0	48.0	55.8	81.3	No
5	61.3	48.1	46.9	46.3	39.3	40.3	48.1	81.3	No
6	61.3	47.1	45.8	45.3	38.3	39.3	47.1	81.3	No
7	61.3	38.1	36.9	36.3	29.3	30.3	38.1	81.3	No
8	61.7	58.3	57.0	56.5	49.5	50.5	58.3	81.7	No
9	61.7	39.0	37.8	37.2	30.2	31.2	39.0	81.7	No
10	70.4	58.1	56.9	56.4	49.4	50.4	58.1	90.4	No
11	70.4	55.2	54.0	53.5	46.5	47.5	55.2	90.4	No
12	70.4	54.6	53.4	52.9	45.8	46.9	54.6	90.4	No
13	52.2	72.7	71.5	71.0	64.0	65.0	72.7	72.2	**Yes**

Notes:
[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*
[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*
[d] *The threshold of significance is measured daytime ambient noise levels plus 20 dBA per the SMMC Chapter 4.12.*

Source: Parker Environmental Consultants, 2025.

Pursuant to SMMC Section 4.12.110(d), any construction that exceeds the established noise level thresholds shall occur between the hours of 10 a.m. and 3 p.m., Monday through Friday. Thus, without mitigation, construction activities that have the potential to exceed the ambient noise level at sensitive receptors by 20 dBA L_{eq} or more, would be scheduled between the hours of 10 a.m. and 3 p.m. Given that SMC has not adopted its own hours of construction, compliance with the City's permissible hours of construction activities would reduce temporary construction noise impacts to less than significant levels.

On-Site Sensitive Receptors

Students and faculty occupying the Main Campus would have the potential to be exposed to construction activity noise throughout the duration of the construction period. The CALGreen threshold for nonresidential interior spaces is 50 dBA. The buildings on-site would provide at least 25 dBA of exterior-to-interior noise reduction. Therefore, if exterior construction noise exceeds 75 dBA, interior noise levels could exceed the 50 dBA threshold. Based on the equipment anticipated for the construction of the Proposed Project (see Table IV.G-6, *Noise Data for Selected Construction Equipment)*, construction noise could potentially exceed the interior standard of 50 dBA. Therefore, this impact is considered potentially significant prior to mitigation. Implementation of Mitigation Measure NOI-MM-4 would reduce construction equipment-related noise impacts to on-site sensitive receptors to a level of less than significant.

3) Maximum Instantaneous Noise Levels

As discussed above, the City of Santa Monica enforces a maximum instantaneous A-weighted, slow sound pressure level not to exceed 40 dBA L_{max}, above ambient noise levels for any period of time. As such, Construction noise impacts were quantified for the maximum instantaneous noise levels during each phase of construction at 13 off-site sensitive receptor locations.

As shown in Table IV.G-10, *Phase 1 – Maximum Instantaneous Construction Noise Levels Without Mitigation,* construction noise impacts during Phase 1 construction activities would range from approximately 44.4 dBA L_{max} to 91.9 dBA L_{max} at the identified sensitive receptors. Phase 1 construction activities would not exceed the applicable maximum instantaneous noise level threshold for any phase of construction. As such, construction noise during Phase 1 would be less than significant prior to mitigation.

Table IV.G-10
Phase 1 – Maximum Instantaneous Construction Noise Levels Without Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA L_{eq}) by Phase [c]					Maximum Const. Noise Level (dBA L_{eq})	Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	91.9	88.5	87.9	83.9	81.9	91.9	101.3	No
2	61.3	91.9	88.5	87.9	83.9	81.9	91.9	101.3	No
3	61.3	87.5	84.0	83.5	79.5	77.5	87.5	101.3	No
4	61.3	78.9	75.5	52.7	48.7	46.7	78.9	101.3	No
5	61.3	69.7	66.2	41.9	37.9	35.9	69.7	101.3	No
6	61.3	68.1	64.6	41.8	37.8	35.8	68.1	101.3	No
7	61.3	57.5	54.0	41.7	37.7	35.7	57.5	101.3	No
8	61.7	85.0	81.5	42.8	38.8	72.1	85.0	101.7	No
9	61.7	44.4	41.0	38.1	34.1	36.8	44.4	101.7	No
10	70.4	72.9	69.5	68.9	64.9	62.9	72.9	110.4	No
11	70.4	64.3	60.9	60.4	56.4	62.9	64.3	110.4	No
12	70.4	52.7	49.3	48.7	44.7	42.7	52.7	110.4	No
13	52.2	61.9	58.5	57.9	53.9	51.9	61.9	92.2	No

Notes:
[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*
[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*
[d] *The threshold of significance is measured daytime ambient noise levels plus 40 dBA per the SMMC Chapter 4.12.*

Source: Parker Environmental Consultants, 2025.

As shown in Table IV.G-11, *Phase 2 – Maximum Instantaneous Construction Noise Levels Without Mitigation,* below, construction noise impacts during Phase 2 construction activities would range from approximately 67.7 dBA L_{max} to 82 dBA L_{max} at the identified sensitive receptors. Phase 2 construction activities would not exceed the applicable maximum instantaneous noise level threshold for any phase of construction. As such, construction noise during Phase 2 would be less than significant prior to mitigation.

Table IV.G-11
Phase 2 – Maximum Instantaneous Construction Noise Levels Without Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]					Maximum Const. Noise Level (dBA L_{eq})	Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	67.7	67.7	67.7	67.7	61.5	67.7	101.3	No
2	61.3	71.9	67.7	67.7	67.7	66.7	71.9	101.3	No
3	61.3	50.6	67.7	67.7	67.7	63.5	67.7	101.3	No
4	61.3	82.0	67.7	67.7	67.7	69.0	82.0	101.3	No
5	61.3	80.1	67.7	67.7	67.7	59.7	80.1	101.3	No
6	61.3	76.5	67.7	67.7	67.7	58.2	76.5	101.3	No
7	61.3	61.9	67.7	67.7	67.7	47.5	67.7	101.3	No
8	61.7	67.7	67.7	67.7	67.7	60.5	67.7	101.7	No
9	61.7	67.7	67.7	67.7	67.7	32.3	67.7	101.7	No
10	70.4	67.7	67.7	67.7	67.7	35.4	67.7	110.4	No
11	70.4	67.7	67.7	67.7	67.7	37.5	67.7	110.4	No
12	70.4	67.7	67.7	67.7	67.7	35.0	67.7	110.4	No
13	52.2	67.7	67.7	67.7	67.7	42.9	67.7	92.2	No

Notes:

[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*

[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*

[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*

[d] *The threshold of significance is measured daytime ambient noise levels plus 40 dBA per the SMMC Chapter 4.12.*

Source: Parker Environmental Consultants, 2025.

As shown in Table IV.G-12, *Phase 3 – Maximum Instantaneous Construction Noise Levels Without Mitigation*, below, construction noise impacts during Phase 3 construction activities would range from approximately 53.3 dBA L_{max} to 87.5 dBA L_{max} at the identified sensitive receptors. Phase 3 construction activities would not exceed the applicable maximum instantaneous noise level threshold for any phase of construction. As such, construction noise during Phase 3 would be less than significant prior to mitigation.

Table IV.G-12
Phase 3 – Maximum Instantaneous Construction Noise Levels Without Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]					Maximum Const. Noise Level (dBAL_{eq})	Const. Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	87.5	84.0	83.5	79.5	77.5	87.5	101.3	No
2	61.3	67.7	64.3	63.8	59.8	57.8	67.7	101.3	No
3	61.3	87.5	84.0	83.5	79.5	77.5	87.5	101.3	No
4	61.3	62.0	58.6	58.0	54.0	52.0	62.0	101.3	No
5	61.3	54.3	50.8	50.3	46.3	44.3	54.3	101.3	No
6	61.3	53.3	49.8	49.3	45.3	43.3	53.3	101.3	No
7	61.3	44.3	40.8	40.3	36.3	34.3	44.3	101.3	No
8	61.7	64.5	61.0	60.5	56.5	54.5	64.5	101.7	No
9	61.7	45.2	41.7	41.2	37.2	35.2	45.2	101.7	No
10	70.4	64.3	60.9	60.4	56.4	54.4	64.3	110.4	No
11	70.4	61.4	58.0	57.5	53.5	51.5	61.4	110.4	No
12	70.4	60.8	57.4	56.8	52.8	50.8	60.8	110.4	No
13	52.2	78.9	75.5	75.0	71.0	69.0	78.9	92.2	No

Notes:
[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*
[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*
[d] *The threshold of significance is measured daytime ambient noise levels plus 40 dBA per the SMMC Chapter 4.12.*

Source: Parker Environmental Consultants, 2025.

b) Off-Site Construction Noise

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 would be generated by haul trucks for demolition debris and soil export during construction. As discussed in Section II, Project Description, the haul route to and from the landfill facilities would likely involve traveling eastbound on Pico Boulevard, and northbound on Cloverfield Boulevard to access the I-10 Freeway. Returning trips would likely utilize the same route but travel southbound on Cloverfield Boulevard and westbound on Pico Boulevard. However, these haul routes may be modified in compliance with SMC and City policies, as applicable to each development phase.

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 up to 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. Based on an average 6 hour hauling period, peak hauling activities would generate up to 10 truck trips per hour (5 inbound and 5 outbound). As stated previously, haul trucks would be limited to off peak hours and would only occur within the permissible hours of construction activities (i.e., between 8 a.m. and 6 p.m. on Monday through Friday, and 9 a.m. to 5 p.m. on Saturday, and no activities on Sunday).

As discussed in the methodology subsection above, the traffic volume on any given roadway would need to double in order for a 3-dBA increase in ambient noise to occur. Based on citywide traffic data published for the City of Santa Monica's Housing Element EIR, in 2019 Pico Boulevard (east of 14th Street) had an average daily trip (ADT) volume of approximately 22,547 vehicles, with an approximate peak hour volume of 6,961 trips between the hours of 4:00 to 7:00 p.m. The increase in noise level of 10 trucks per hour during peak hauling activities of the Proposed Project would have the equivalent noise level as 28 cars. An increase of 28 cars during peak hours would represent an approximate 0.4 percent increase in roadway volume, which is well below the increase necessary to create a discernable change in noise levels for residents or occupants and visitors in any of the sensitive uses located along the haul route. As such, the hauling activities during construction would result in a less than significant impact to off-site noise receptors.

c) Operational Roadway Noise Impacts

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. With development of the Proposed Project, on-site parking would continue to be provided in at-grade surface parking lots and parking garages and no changes to the on-site vehicular circulation plan are proposed. No additional parking spaces are proposed. Additionally, as the Proposed Project would result in a net decrease in total floor area as compared to existing conditions, the Proposed Project would result in a net reduction in vehicle trips to the Campus. As such, mobile source noise from operating the Proposed Project would be less than significant.

d) Outdoor Activity Noise Levels

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. Since the Proposed Project does not propose to increase student capacity and the daily operational activities on the Main Campus would remain the same, student-related use noise is expected to be similar to existing conditions. Additionally, activities conducted on public or private school grounds, including school athletic and school entertainment events, are exempt from the City's noise standards, under Section 4.12.030 of the SMMC. Thus, the proposed outdoor open space areas would not generate significant noise impacts and noise impacts from outdoor activities would be less than significant.

e) Mechanical and Heating, Ventilation, and Air Conditioning (HVAC) Equipment Noise Levels

The Proposed Project would include new mechanical equipment, HVAC units, and exhaust fans on the roofs of the proposed new structures. Specific details regarding mechanical equipment, such as the type, size and location of emergency standby generators, cooling towers, boilers and HVAC equipment, is not available at this time. However, the design of building mechanical systems 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.

For purposes of this analysis, the predicted noise levels from on-site mechanical equipment was based on estimated A-weighted reference noise level of 77 dBA L_{eq}[43] at the source and the approximate distance between the source and the sensitive receptors. As summarized in Table IV.G-13, *Estimated Noise Levels from Mechanical Equipment*, based on the approximate distances to the nearby sensitive receptors, the estimated ambient plus HVAC noise levels at nearby sensitive receptors would range from 53.2 dBA L_{eq} to 70.5 dBA L_{eq}, which would be below the 5-dBA L_{eq} increase above ambient noise levels at the sensitive receptors. As such, noise impacts from mechanical equipment would be less than significant.

[43] The reference noise level of 77 dBA is based on a product data sheet for a Performance Single-Packaged Air Conditioner and Gas Furnace System (See Noise Calculation Worksheets in Appendix F).

Table IV.G-13
Estimated Noise Levels from Mechanical Equipment

ID[a]	Distance to Project Site (feet)[b]	Ambient Noise Level (dBA L_{eq})[c]	HVAC Noise Level at Receiver (dBA L_{eq})	Ambient + HVAC Noise Level (dBA L_{eq})	Significance Threshold (dBA L_{eq})[d]	Significant Impact?
1	79	61.3	59.0	63.3	66.3	No
2	84	61.3	58.0	63.0	66.3	No
3	70	61.3	61.2	64.3	66.3	No
4	104	61.3	54.2	62.1	66.3	No
5	129	61.3	50.6	61.7	66.3	No
6	217	61.3	41.5	61.3	66.3	No
7	406	61.3	30.6	61.3	66.3	No
8	58	61.7	64.3	66.2	66.7	No
9	72	61.7	60.8	64.3	66.7	No
10	100	70.4	55.0	70.5	75.4	No
11	168	70.4	46.0	70.4	75.4	No
12	257	70.4	38.6	70.4	75.4	No
13	163	52.2	46.5	53.2	57.2	No

Notes:
[a] *See Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *The distance to HVAC equipment factors in the height of the building in addition to the ground level distance from the receptor to the approximate building footprint.*
[c] *The ambient noise level is based on the daytime ambient noise levels previously identified in Table IV.G-5.*
[d] *The significance criteria are based on the daytime ambient noise levels plus 5 dBA L_{eq}.*
Calculation worksheets are provided in Appendix F to this Draft EIR.
Source: Parker Environmental Consultants, 2025.

2. Mitigation Measures

As analyzed above, construction of the Proposed Project would have the potential to result in significant noise impacts at the off-site sensitive receptor locations from on-site construction activities during Phase 1 and Phase 3 construction activities. Therefore, the following mitigation measures are provided to reduce construction-related noise impacts:

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.

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.

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 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.

3. Level of Significance After Mitigation

Implementation of Mitigation Measure NOI-MM-1 would reduce on-site construction noise levels at Sensitive Receptors 1, 2, and 3 during Phase 1. As shown in Table IV.G-14, *Phase 1 – Construction Noise Levels with Mitigation*, installation of a temporary noise barrier with a minimum noise attenuation of 5 dBA L_{eq} would reduce noise levels from approximately 85.7 dBA L_{eq} at Sensitive Receptors 1 and 2 to approximately 80.7 dBA L_{eq} and from approximately 81.3 dBA L_{eq} to approximately 76.3 dBA L_{eq} at Sensitive Receptor No. 3. Therefore, construction noise levels would be less than significant after mitigation.

Table IV.G-14
Phase 1 – Construction Noise Levels with Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]					Maximum Noise Level (dBA L_{eq})	Const. Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	80.7	79.5	78.9	71.9	72.9	80.7	81.3	No
2	61.3	80.7	79.5	78.9	71.9	72.9	80.7	81.3	No
3	61.3	76.3	75.0	74.5	67.5	68.5	76.3	81.3	No

Notes:
[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*
[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*
[d] *The threshold of significance is measured daytime ambient noise levels plus 20 dBA per the SMMC Chapter 4.12.*
Source: Parker Environmental Consultants, 2025.

Implementation of Mitigation Measures NOI-MM-2 and NOI-MM-3 would reduce the Proposed Project's on-site construction noise levels during Phase 3 construction activities at Sensitive Receptors 1, 3, and 13. As shown in Table IV.G-15, *Phase 3 Construction Noise Levels with Mitigation*, below, installation of a temporary noise barrier with a minimum noise attenuation of 5 dBA L_{eq} would effectively reduce noise levels to below a 20 dBA L_{eq} increase above ambient noise levels. Construction noise levels at Sensitive Receptors 1 and 3 would be reduced from approximately 81.3 dBA L_{eq} to approximately 76.3 dBA $L_{eq.}$ Construction noise levels at Sensitive Receptor 13 would be reduced from approximately 72.7 dBA L_{eq} to approximately 67.7 dBA $L_{eq..}$ Consequently, construction noise impacts during Phase 3 would be reduced to less than significant levels after mitigation.

Table IV.G-15
Phase 3 – Construction Noise Levels with Mitigation

ID[a]	Ambient Noise (dBA L_{eq})[b]	Noise Level Impact (dBA Leq) by Phase [c]					Maximum Noise Level (dBA L_{eq})	Const. Noise Threshold (dBA Leq)[d]	Significant Impact?
		Demo	Grading	Building Construction	Paving	Arch. Coating			
1	61.3	76.3	75.0	74.5	67.5	68.5	76.3	81.3	No
3	61.3	76.3	75.0	74.5	67.5	68.5	76.3	81.3	No
13	52.2	67.7	66.5	66.0	59.0	60.0	67.7	72.2	No

Notes:
[a] *ID refers to the sensitive receptor locations identified in Figure IV.G-3, Noise Monitoring and Sensitive Receptor Map.*
[b] *Daytime noise levels are based on noise measurements taken at the sensitive receptors (see Table IV.G-5, above).*
[c] *Construction noise calculation worksheets are based on FHWA's Roadway Construction Noise Model (RCMN). All calculations are provided in Appendix F, Noise Modeling Worksheets.*
[d] *The threshold of significance is measured daytime ambient noise levels plus 20 dBA per the SMMC Chapter 4.12.*
Source: Parker Environmental Consultants, 2025.

4) Off-Site Haul Truck Construction Noise

Noise impacts from off-site haul truck noise levels would be less than significant. Therefore, no mitigation measures are required and impacts would remain less than significant.

5) Operational Noise

Noise impacts associated with on-site noise sources and off-site traffic during operation of the Proposed Project were determined to be less than significant without mitigation. Therefore, no mitigation measures are required and impacts would remain less than significant.

Threshold (b): Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?

1. Impact Analysis

a) On-Site Construction Vibration

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. Based on data published by the FTA, the standard vibration velocities for heavy construction equipment activities such as operating large bulldozers and caisson drilling can be as high as 0.89 PPV (in./sec.) at 25 feet from the source.[44] The closest distance from groundborne vibration generating construction equipment to any nearby off-site structure is 15 feet. As shown in Table IV.G-16, *Construction Vibration Impacts - Building Damage*, vibration impacts at the nearest off-site buildings would range from 0.001 PPV (in./sec.) to 0.191 PPV (in./sec.). Thus, applying the most sensitive threshold criteria for building damage to unreinforced masonry or timber structures (e.g., 0.2 PPV (in./sec.) vibration impacts would be below the threshold criteria to cause ground-borne vibration damage.

b) Off-Site Construction Vibration

As discussed above, 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. Based on an average 6 hour hauling period, peak hauling activities would generate up to 10 truck trips per hour (5 inbound and 5 outbound). Based on FTA data, the vibration generated by a typical heavy truck is approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Therefore, vibration impacts (pursuant to the significance criteria for building damage) from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant.

[44] Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006. Vibration calculations are provided in Appendix F, Noise and Vibration Worksheets.

Table IV.G-16
Construction Vibration Impacts - Building Damage

ID[a]	Distance to Source (feet)[b]	Reference Vibration Velocity Levels at the Off-Site Sensitive Uses Due to On-Site Construction Equipment Operations (PPV (in./sec.) at 25 ft.)[a]					Maximum Vibration Levels	Significance Criteria	Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-Hammer	Small Bulldozer			
1	15	0.089	0.089	0.076	0.035	0.003	0.191	0.2	No
2	15	0.089	0.089	0.076	0.035	0.003	0.191	0.2	No
3	35	0.089	0.089	0.076	0.035	0.003	0.054	0.2	No
4	100	0.089	0.089	0.076	0.035	0.003	0.011	0.2	No
5	200	0.089	0.089	0.076	0.035	0.003	0.004	0.2	No
6	200	0.089	0.089	0.076	0.035	0.003	0.004	0.2	No
7	400	0.089	0.089	0.076	0.035	0.003	0.001	0.2	No
8	50	0.089	0.089	0.076	0.035	0.003	0.031	0.2	No
9	65	0.089	0.089	0.076	0.035	0.003	0.021	0.2	No
10	560	0.089	0.089	0.076	0.035	0.003	0.001	0.2	No
11	170	0.089	0.089	0.076	0.035	0.003	0.005	0.2	No
12	215	0.089	0.089	0.076	0.035	0.003	0.004	0.2	No
13	90	0.089	0.089	0.076	0.035	0.003	0.013	0.2	No

Notes:
[a] Reference vibration levels calculated based on FTA reference vibration level at a 25-foot distance.
[b] Distance is measured from the vibration source to the receptor building footprint.
Sources: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018, Parker Environmental Consultants, 2025. Calculation worksheets are provided in Appendix F of this Draft EIR.

c) Operational Vibration Impacts

The Proposed Project would not involve the use of stationary equipment that would have the potential to generate high groundborne vibration levels. A relatively low degree of groundborne vibration already occurs within the Project Site and immediate vicinity under existing conditions from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on nearby local roadways. The proposed land uses would have similar operational vibration characteristics as the surrounding uses. The Proposed Project would not introduce substantially more heavy-duty trucks during Proposed Project operation 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 Proposed Project would be less than significant.

2. Mitigation Measures

The Proposed Project's groundborne vibration impacts would be less than significant. Therefore, no mitigation measures are warranted.

3. Level of Significance After Mitigation

The Proposed Project's impacts related to exposure of persons to or generation or excessive groundborne vibration levels were determined to be less than significant prior to mitigation.

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

As discussed in the Initial Study (provided in Appendix A to this Draft EIR), the Proposed Project is not located within a private airstrip, airport land use plan or within two miles of a public airport or public use airport. The closest public airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 8 miles southwest of the Project Site. The Project Site is located within two miles of the Santa Monica Airport, which is a private airport. The Project Site is not located within an airport hazard area for LAX nor the Santa Monica Airport. As such, the Proposed Project would not expose people residing or working in the Proposed Project area to excessive noise levels associated with an airport, and no impact would occur.

1. Mitigation Measures

No mitigation measures are required.

2. Level of Significance After Mitigation

As discussed above, there would be no impact related to the Proposed Project's proximity to the Santa Monica Airport and no mitigation measures are required.

E. Cumulative Impacts

1. Impact Analysis

This cumulative impact analysis considers development of the Proposed Project in combination with ambient growth and other development projects within the vicinity. As noise is a localized phenomenon and decreases in magnitude as distance from the source increases, the cumulative noise analysis assesses projects and ambient growth in the nearby area that could combine with the Proposed Project to result in cumulatively considerable noise impacts. Also, the analysis assesses cumulative traffic noise that the related project could add to the surrounding roadway network.

a) Construction

1) On-Site Construction Noise and Vibration

Construction of the Proposed Project, in combination with related projects, would have the potential to increase construction noise and vibration. Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. As noted in Section III, Environmental Setting, there are 26 related projects identified within a 0.5 mile radius of the Project Site, four of which are located within 1,000 feet of the Project Site.[45] Due to the level of development and intervening structures between the Project Site and these related projects, only Related Project 18 is close enough with a direct line of sight to the Campus to have the potential to generate cumulative noise and vibration impacts when combined with the Proposed Project's construction activities. However, based on a field survey, this related project is already constructed and operating. Therefore, impacts associated with cumulative on-site noise and vibration impacts would be less than significant.

b) Operation

i) On-Site Operational Noise and Vibration

As discussed above, the closest related project to the Project Site that would have the potential to result in cumulative noise impacts when combined with the Proposed Project is Related Project 18. Related Project 18 is located across Pico Boulevard, approximately 85 feet to the north of the Project Site and is fully constructed and operational. This related project is a mixed-use residential and commercial project that would generate similar urban noise levels as the Proposed Project and the surrounding vicinity. The operation of related projects is not anticipated to result in cumulative operational noise, since local traffic already contributes to the ambient noise in the Project vicinity. As such, there would be no potential for significant cumulative operational noise and vibration impacts to occur. Therefore, cumulative on-site operational noise and vibration impacts would be less than significant.

ii) Off-site Cumulative Operational Roadway Noise

Cumulative roadway noise and vibration impacts would occur primarily as a result of increased vehicle trips on local roadways and intersections due to the Proposed Project, ambient growth, and related projects within the study area. Since the Proposed Project would result in a net decrease in floor area as compared to existing conditions, as is not expected to increase vehicle trips to the Campus, there would be no potential for the Proposed Project to contribute to cumulative roadway noise impacts. As such cumulative roadway noise impacts would be less than significant.

[45] Related Projects 2, 4, 6 and 18 are within 1,000 feet of the Project Site.

2. Mitigation Measures

Cumulative noise impacts would be less than significant. Therefore, no mitigation measures are required.

3. Level of Significance After Mitigation

Cumulative impacts related to noise would be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level would remain less than significant without mitigation.

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V. PROJECT ALTERNATIVES

A. INTRODUCTION

Public Resources Code (P.R.C.) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. P.R.C. Section 21002.1(a) further states, that "[t]he purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would 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 evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the Proposed Project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines Section 15126.6(f)(1) states that:

> "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […]"

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

As set forth in Section II, Project Description, the objectives of the Proposed Project 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.

B. ANALYTICAL ASSUMPTIONS AND METHODOLOGY

The level of detail required in the alternatives analysis does not need to be as detailed as required for the environmental analysis of the Proposed Project. Rather, an EIR should include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project."[1] Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.[2] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:

- **Less:** Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Proposed Project, the comparative impact is said to be "less."
- **Greater:** Where the net impact of the alternative would clearly be more adverse or less beneficial than the Proposed Project, the comparative impact is said to be "greater."
- **Similar:** Where the impact of the alternative and Proposed Project would be roughly equivalent, the comparative impact is said to be "similar."

A summary matrix that compares the impacts associated with the Proposed Project with the impacts of each of the analyzed alternatives is provided in Table V-1, below.

1. Regulatory Setting

CEQA Guidelines Section 15126.6(b) states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly." According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, the

1 CEQA Guidelines Section 15126.6(d).

2 CEQA Guidelines Section 15126.6(c).

alternative's inability to avoid significant environmental impacts, or other grounds considered by the Lead Agency and supported by substantial evidence.

The environmental impact analyses contained in Section IV, Environmental Impact Analysis, concluded that the Proposed Project would result in less than significant impacts or less than significant impacts with mitigation for all impact categories addressed in the EIR.

In accordance with CEQA Guidelines Section 15126.6(c), the State CEQA Guidelines require EIRs to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and to briefly explain the reasons underlying the Lead Agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, or (ii) inability to avoid significant environmental impacts. The following alternatives were considered and rejected by SMC:

- Expansion of the Main Campus Boundaries: An alternative involving the expansion of the Main Campus' boundaries was determined to be infeasible as the properties surrounding the SMC Main Campus are largely built out and under separate ownership. Acquiring multiple contiguous properties immediately surrounding the Main Campus through market demand or eminent domain was determined to be economically infeasible and unjustifiable given the limited availability of land at various off-site locations. Additionally, considering the mixes of uses in the surrounding area, including sensitive uses, development of the Proposed Project at the surrounding properties could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Proposed Project. Therefore, expansion of the SMC Main Campus boundaries is not considered a feasible or viable alternative that would achieve the underlying purpose and objectives of the Proposed Project. Therefore, this alternative was rejected as infeasible.

2. 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 Project Alternatives evaluated within the scope of this EIR are as follows:

1) Alternative 1 - No Project Alternative

2) Alternative 2 - Reduced Density Alternative

A detailed description and environmental analysis for each of these alternatives is provided within Sections V.1 and V.2, below. The identification of the alternative that would be most capable of reducing the Proposed Project's environmental impacts is presented in Section V.3, Environmentally Superior Alternative.

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 this Section, and as further summarized in Table V-1 below, 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.

Table V-1
Alternative Comparative Impact Matrix

Impact Area	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative – Phase 1 and 2 Only
A. AESTHETICS			
Scenic Vista	No Impact	No Impact (similar)	No Impact (similar)
Scenic Resources	No Impact	No Impact (similar)	No Impact (similar)
Scenic Quality - Construction	Less Than Significant with Mitigation	No Impact (less)	Less Than Significant with Mitigation (similar)
Scenic Quality - Operation	Less Than Significant	No Impact (greater)	Less Than Significant (greater)
Light and Glare	Less Than Significant	No Impact (greater)	Less Than Significant (greater)
Shade and Shadow	Less Than Significant	No Impact (less)	Less Than Significant (less)
B. AIR QUALITY			
Plan Consistency	Less Than Significant	No Impact (less)	Less Than Significant (similar)
Construction Impacts			
Regional Emissions	Less Than Significant	No Impact (less)	Less Than Significant (less)
Localized Emissions	Less Than Significant	No Impact (less)	Less Than Significant (less)
Toxic Air Contaminants	Less Than Significant	No Impact (less)	Less Than Significant (less)
Operational Impacts			
Regional Emissions	Less Than Significant	No Impact (greater)	Less Than Significant (greater)
Localized Emissions	Less Than Significant	No Impact (greater)	Less Than Significant (greater)

Impact Area	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative – Phase 1 and 2 Only
Toxic Air Contaminants	Less Than Significant	No Impact (greater)	Less Than Significant (similar)
C. CULTURAL RESOURCES			
Historic Resources	Less Than Significant	No Impact (similar)	Less Than Significant (similar)
Archaeological Resources	Less Than Significant	No Impact (less)	Less Than Significant (similar)
Human Remains	Less Than Significant	No Impact (less)	Less Than Significant (similar)
D. ENERGY			
Consumption of Energy Resources			
Construction - Electricity, Natural Gas, and Transportation Energy	Less Than Significant	No Impact (less)	Less Than Significant (less)
Operational - Electricity	Less Than Significant	No Impact (greater)	Less Than Significant (greater)
Operational - Natural Gas	Less Than Significant	No Impact (greater)	Less Than Significant (greater)
Operational - Transportation Energy	Less Than Significant	No Impact (similar)	Less Than Significant (greater)
Plan Consistency	Less Than Significant	Less Than Significant (greater)	Less Than Significant (similar)
E. GREENHOUSE GAS EMISSIONS			
Plan Consistency	Less Than Significant	Less Than Significant (greater)	Less Than Significant (similar)
Construction - Direct or Indirect GHG Generation	Less Than Significant	No Impact (less)	Less Than Significant (less)
Operational - Direct or Indirect GHG Generation	Less Than Significant	No Impact (greater)	Less Than Significant (greater)
F. LAND USE AND PLANNING			
Zoning and Plan Consistency	Less Than Significant	No Impact (less)	Less Than Significant (similar)
G. NOISE			
Construction Noise	Less Than Significant with Mitigation	No Impact (less)	Less Than Significant (less)
Construction Vibration	Less Than Significant	No Impact (less)	Less Than Significant

Impact Area	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative – Phase 1 and 2 Only
			(less)
Operational Noise	Less Than Significant	No Impact (similar)	Less Than Significant (similar)
Operational Vibration	Less Than Significant	No Impact (similar)	Less Than Significant (similar)

V.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

A. INTRODUCTION

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the Proposed Project does not proceed. CEQA Guidelines (Section 15126.6(e)) provides that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what can reasonably be expected to occur in the foreseeable future if the project is not approved based on current plans and consistent with available infrastructure and community services. As shown in Table V-2, at the time the NOP was published, the Project Site was developed with 1,065,931 square feet of existing gross floor area, and supporting facilities including Corsair Field, swimming pools, and other maintenance support facilities, and parking structures with a total of 2,860 vehicle parking spaces.

Table V-2
No Project Alternative Land Uses

Land Uses	Floor Area [a] (Square Feet)
SMC Main Campus	1,065,931 sf
Parking	2,860 spaces
Total Developed Floor Area	**1,065,931 sf**
Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.	

B. ENVIRONMENTAL ANALYSIS

a. Aesthetics

Section IV.A, Aesthetics, concluded there are no scenic vistas available to or from the Project Site nor are any scenic visual resources provided on the SMC Main Campus. The No Project Alternative would not involve any new construction or demolition associated with the Proposed Project. No improvements or physical modifications would occur, and the Project Site would remain in its present form. Therefore, views of the Project Site would remain unchanged. Thus, the No Project Alternative would have no impact on scenic vistas or scenic resources. Additionally, the No Project Alternative would retain the existing sources of lighting and glare on the Project Site and in the surrounding area and would not increase any building heights, resulting in no impacts from shade and shadow. Therefore, the No Project Alternative would result in no impact with respect to aesthetics.

While the No Project Alternative includes no physical alterations to the current site, this alternative would not provide the benefit of modernizing academic and student places, improving the physical conditions of the Pearl Street buildings, improving pedestrian pathways and campus entrances, nor improving the quality and character of the campus open space. Furthermore, the No Project Alternative would not improve the light and glare like the Proposed Project. Therefore, aesthetic impacts under the No Project Alternative, such as scenic quality and light and glare would be greater than the Proposed Project.

b. Air Quality

i. Construction

The No Project Alternative would not create any construction emissions, as demolition and construction activities would not occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to plan consistency, regional and localized air quality emissions, and toxic air contaminants during the construction phase.

ii. Operation

1. Plan Consistency

The No Project Alternative would not increase population growth and would have no impact with respect to construction and operational emissions. Therefore, this Alternative would not conflict with or obstruct implementation of the applicable air quality plan, and no impact associated with plan consistency would occur. Furthermore, this impact would be less than the Proposed Project's less than significant impact.

2. Regional and Localized Emissions

Operational air pollutant emissions are generated at the Project Site by the existing SMC Main College Campus. Stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Project Site contribute to the Project's Site's existing emissions. The similar utilization of the Project Site as compared to existing conditions would create similar air pollution emissions from stationary sources and mobile sources. Under the current conditions, the existing uses on the Project Site generate maximum daily emissions of 111 pounds per day (ppd) of VOC, 68.9 ppd of NO_X, 672 ppd of CO, 1.37 ppd of SO_X, 115 ppd of PM_{10} and 30.9 ppd of $PM_{2.5,}$ as shown in Table IV.B-3, in Section IV.B, Air Quality, of this Draft EIR. Motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site for all six criteria pollutants. Compared to existing conditions, the No Project Alternative would result in no change in air

quality emissions. Therefore, no operational air quality impacts associated with regional or localized emissions would occur with the No Project Alternative.

When compared to the Proposed Project, the No Project Alternative would not improve existing buildings with up-to-date eco-friendly building materials, systems, and features, including ENERGY STAR-rated appliances, water saving and low-flow fixtures, solar generation, low-emitting materials and adhesives with low volatile organic compounds (VOC), drought tolerant planting, and high-performance mechanical equipment. Additionally, the Proposed Project would reduce overall building square feet across the campus. Therefore, the No Project Alternative's operational emissions are higher than the Proposed Project. As such, operational air quality impacts associated with regional or localized emissions would be greater with the No Project Alternative.

3. Toxic Air Contaminants

The No Project Alternative would not result in new development and therefore, no new increase in TAC emissions would occur. However, the No Project Alternative would increase the intensity of the existing uses on the Project Site when compared to the Proposed Project. Thus, no impacts associated with TACs would occur under the No Project Alternative, but impacts would be increased when compared to the Proposed Project's less than significant impacts.

c. Cultural Resources

i. Historical Resources

The No Project Alternative would not involve the demolition or renovation of any buildings on-site. The No Project Alternative would have no impact on historic resources, since no historical resources or buildings are located on the Project Site. Thus, the No Project Alternative would have similar impacts as the Proposed Project with respect to historic resources.

ii. Archaeological Resources and Human Remains

Section IV.C, Cultural Resources, of this Draft EIR, determined there is a low potential for archaeological resources and human remains to be discovered on the Project Site, since the Project Site has been subject to past ground disturbing activities and is currently fully developed by the SMC Main Campus. However, discovery may occur and compliance with regulatory measures would ensure a less than significant impact upon archaeological resources and human remains.

The No Project Alternative would not involve any earthwork or ground disturbing activities. As such, there would be no potential for any adverse impacts to occur to archaeological resources nor would there be a direct or indirect disturbance of human remains. Therefore, the No Project Alternative would have no impact to archeological resources and human remains. When compared to the Proposed Project, the No Project Alternative would have a lesser impact upon archaeological resources and human remains.

d. Energy

i. Wasteful, Inefficient, or Unnecessary Consumption of Energy

1. Construction

The No Project Alternative would not result in any new development or renovation of buildings on the Project Site. As such, no new construction energy demands would occur. The No Project Alternative would have no impact when compared to the Proposed Project's less than significant impacts with respect to energy consumption during the construction phase.

2. Operation

a. Electricity

As discussed in Section IV.D, Energy, the existing electricity demand consumption by the entire SMC Main Campus is approximately 15,878,885 kilowatt hours per year (kWh/year) at the Project Site. The No Project Alternative would result in no change to the electricity demand at the Project Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased electricity demand. No impacts related to wasteful, inefficient, or unnecessary consumption of energy resources related to electricity would occur under the No Project Alternative.

When compared to the Proposed Project, the No Project Alternative would not improve existing buildings with up-to-date eco-friendly building materials, systems, and features, including ENERGY STAR-rated appliances, solar generation, 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, the Proposed Project would reduce overall building square feet across the campus. Therefore, the No Project Alternative's electricity consumption would be higher than the Proposed Project. Thus, the No Project Alternative would have an increased impact from electricity consumption when compared to the Proposed Project's less than significant impacts.

b. Natural Gas

The existing natural gas demands for the entire SMC Main Campus is estimated to be approximately 512,520 hundred cubic feet (ccf) per year at the Project Site. The No Project Alternative would result in no change to the natural gas demand at the Project Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased natural gas demand. No impacts related to wasteful, inefficient, or unnecessary consumption of energy resources related to natural gas would occur under the No Project Alternative.

As mentioned previously, the Proposed Project would promote energy conservation and the reduction in natural gas, in accordance with the policies identified in 2022 Title 24 Standards and SMC Board of Trustees, which would include improving and replacing existing buildings with zero-net energy buildings. Thus, the No Project Alternative would have an increased impact from natural gas demand when compared to the Proposed Project's less than significant impacts.

c. Transportation Energy

The existing conditions net transportation energy consumption are estimated to be approximately 1,890,700 gallons of transportation fuel, including approximately 216,411 gallons of diesel per year and 1,674,289 gallons of gasoline per year for the entire SMC Main Campus. The No Project Alternative would result in no change to the transportation energy demand at the Project Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased transportation energy consumption. No impacts related to wasteful, inefficient, or unnecessary consumption of transportation energy resources would occur under the No Project Alternative.

The Proposed Project would not result in the generation of additional employees or students. The college would continue to operate as it currently does. Therefore, it is assumed there would be no increase in trips or transportation energy from the Proposed Project. Therefore, the No Project Alternative would have similar transportation energy consumption when compared to the Proposed Project's less than significant impacts.

ii. Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project Alternative would not result in new development or renovation of the existing uses on the Project Site. As such, the No Project Alternative would not meet existing CALGreen Code, Title 24 standards, and SMC's Board of Trustees goals and policies. Thus, the No Project Alternative would not provide the benefit of promoting energy conservation measures throughout the SMC Main Campus nor implement policies, programs and plans that intend to reduce the reliance on fossil fuels, greenhouse gas emissions, energy demand, and promote

overall public health. As such, the No Project Alternative would not be consistent with current state or local plans for renewable energy or energy efficiency, and impacts would be increased compared to the Proposed Project, but still less than significant.

e. Greenhouse Gas Emissions

i. Plan Consistency

The No Project Alternative would not result in new development or renovation of the existing uses on the Project Site. As such, the No Project Alternative would not meet the most recent CALGreen Code, Climate Change Scoping Plan, CARB's RTP/SCS, and the SMC's Board of Trustees goals and policies. Thus, the No Project Alternative would not provide the benefit of promoting energy conservation measures throughout the SMC Main Campus nor implement policies, programs and plans that intend to reduce the reliance on fossil fuels and greenhouse gas emissions (GHG). As such, the No Project Alternative would not be consistent with current state or local plans related to GHG, and impacts would be increased compared to the Proposed Project, but still less than significant.

ii. Direct or Indirect GHG Generation

1. Construction

The No Project Alternative would not create any construction-related GHG emissions, since demolition, renovation, and new construction would not occur. Hence, the No Project Alternative would completely avoid construction GHG emissions when compared to the Proposed Project's less than significant impacts, and there would be no impact with respect to construction emissions.

2. Operation

GHG emissions are currently generated at the Project Site by stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and mobile vehicle traffic traveling to and from the Project Site. No improvements or physical modifications would occur, and the Project Site would remain in its present form. Greenhouse gas emissions from stationary sources and mobile sources would be similar to existing operations under the No Project Alternative. Under the current conditions, the SMC Main Campus generates approximately 24,261 $MTCO_2e$ per year on the Project Site. No new GHG emissions beyond what is currently generated on the Project Site would be generated under the No Project Alternative, and no new impacts associated with global climate change would occur. Therefore, no impacts from operation would occur.

When compared to the Proposed Project, the No Project Alternative would not provide the benefit of promoting GHG reduction measures throughout the SMC Main Campus nor implement policies, programs and plans that intend to reduce the reliance on fossil fuels, GHG, and energy demand. Additionally, the Proposed Project would reduce overall building square feet compared to existing conditions. Therefore, the generation of GHG emissions under the No Project Alternative would be greater compared to the Proposed Project.

f. Land Use and Planning

Under the No Project Alternative, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, the No Project Alternative would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with land use regulations and plans would occur, and impacts would be reduced compared to the less-than-significant impacts of the Proposed Project.

g. Noise

i. Construction

The No Project Alternative would involve no new construction. As such, no construction noise or vibration would occur on-site or off-site under the No Project Alternative. No earthwork or grading activities would occur under this alternative. Thus, there would be no potential for groundborne construction vibration impacts. Therefore, no impacts associated with construction noise and vibration would occur under the No Project Alternative. Under the No Project Alternative, impacts with respect to construction noise or vibration would be reduced as compared to the Proposed Project's less than significant impacts with mitigation.

ii. Operation

1. Noise

The No Project Alternative would not introduce any new activities or land uses to the Project Site with the potential to create operational noise impacts or impact off-site sensitive receptors with potential noise impacts. Operational noise on-site would be typical of the student activities and educational 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, consistent with existing uses on-site. Under the No Project Alternative, no impact with respect to on-site noise would occur with respect to operational noise.

When compared to the Proposed Project, both the Proposed Project and No Project Alternative do not propose to increase parking spaces or overall building square feet across the SMC Main Campus. The Proposed Project would not result in the generation of additional employees or students. Therefore, operational noise impacts under the No Project Alternative would be similar to the Proposed Project's less than significant impact with respect to operational noise.

2. Groundborne Vibration

The No Project Alternative would continue the existing institutional uses. The No Project Alternative would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Groundborne vibration occurs at the Project Site and immediate vicinity under existing conditions from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on nearby local roadways. The No Project Alternative would result in no change to the existing groundborne vibration at the Project Site compared to existing conditions. Compared to existing conditions, the No Project Alternative would result in no increased groundborne vibration. No impacts related to groundborne vibration would occur under the No Project Alternative. Similarly, the Proposed Project does not propose changing the existing institutional land uses. Therefore, impacts would be similar to the Proposed Project's less than significant impacts with respect to operational groundborne vibration.

C. IMPACT CONCLUSION

As discussed above and summarized in Table V-1, above, in comparison to the Proposed Project, the No Project Alternative would have no impact with respect to construction-related impacts (aesthetics, air quality emissions, cultural resources, energy consumption, GHG emissions land use and planning, and construction noise and vibration). However, since the No Project Alternative would not improve the existing building designs that would implement policies, programs and plans that intend to reduce the reliance on fossil fuels, GHG emissions, energy demand, and promote overall public health, the No Project Alternative would result in increased operational impacts with respect to aesthetics (scenic quality), air quality, energy, and GHG emissions, when compared to the environmental impact categories evaluated in the EIR.

D. RELATIONSHIP OF THE NO PROJECT ALTERNATIVE TO THE PROJECT OBJECTIVES

Under the No Project Alternative, the existing uses on-site would continue operating and no new buildings would be developed or renovated. As such, the No Project Alternative would not meet any of the Project objectives listed above and in Section II, Project Description. Specifically, the No Project Alternative would not meet the objectives of modernizing and upgrading the existing on-site buildings to currently meet the students' needs that would provide a better student and academic experience.

The No Project Alternative would not improve the visual appearance and appeal of the existing SMC Main Campus, by not replacing older and run-down academic buildings with more modern, cohesive, and efficient buildings that provide better campus connectivity. The No Project Alternative would not improve internal student and pedestrian circulation, nor improve the character of the campus open space, which are intended to promote student and faculty safety. Additionally, the No Project Alternative would not upgrade the Campus Police Headquarters along Pearl Street. Furthermore, the No Project Alternative would not promote the SMC's Board of Trustees sustainability goals since the on-site buildings would not include up-to-date energy efficient building designs to reduce energy consumption and GHG.

As such, although the No Project Alternative would result in no impacts compared to the Proposed Project's less than significant impacts for aesthetics, air quality, cultural resources, energy, GHG, and land use and planning, and the Proposed Project's less than significant impacts with mitigation for noise, this Alternative would not meet the identified Proposed Project objectives. The No Project Alternative would also not meet the underlying purpose of the Proposed Project to transform an aging college campus into a modernized and upgraded campus to better serve SMC students, faculty, and administration.

V.2 ALTERNATIVE 2
REDUCED DENSITY ALTERNATIVE

A. INTRODUCTION

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. The Reduced Density Alternative proposes the demolition of approximately 279,311 gsf of existing temporary and permanent buildings, and the new construction of approximately 256,216 gsf (167,140 asf) of new development including the Pico 1 Building (76,474 gsf), the Pico 2 Building (99,742 gsf), a new police headquarters (12,000 gsf), a new student union (42,000 gsf), and a new maintenance and operations facility (26,000 gsf). The Proposed Project would also include a total of 207,073 gsf of renovations to two existing buildings: the Physical and Life Science Complex, and the Library and Media Center.

Compared to the Proposed Project, the Reduced Density Alternative would continue the existing use of the five buildings on the Project Site (Business, Art Complex, Campus Events, Environmental Center, and Auxiliary Services) totaling 80,789 gsf. By omitting Phase 3 demolition and construction, the Reduced Density Alternative would reduce the proposed open space designated for the Welcome Lawn, Organic Learning Garden, the Student Services Center outdoor event space, Amphitheater and event plaza, and new Quad. Thus, the total building area across the SMC Main Campus would overall reduce from 1,065,931 gsf of existing floor area to 1,042,836 gsf for the Reduced Density Alternative at full buildout. However, the Reduced Density Alternative would provide more gross floor area than the Proposed Project (971,047 gsf), since this Alternative would retain five buildings on-site.

Similar to the Proposed Project, the Reduced Density Alternative would allow for a 20-year planning horizon, with final buildout occurring by 2045. However, for purposes of providing a conservative analysis for analyzing maximum intensity construction impacts, and to properly account for the potential overlap of concurrent demolition and construction activities, the environmental analysis for this Alternative assumes a construction schedule over an approximate seven-year duration (four years for Phase 1 and three years for Phase 2). A summary of the development program under this Alternative is provided below in Table V-3, Reduced Density Alternative Development Summary.

Table V-3
Reduced Density Alternative Development Summary

Bldg #	PHASES	ASF	GSF
	Proposed Demolitions		
1	Pico Classroom Complex	12,175	18,014
17	Math Complex	27,308	44,872
22	Drescher Hall	64,761	111,145
23	Pico Village	8,190	8,640
27	Campus Police A	1,111	1,400
27	Campus Police B	1,310	1,990
28	Campus Police Annex	1,877	2,000
44	Faculty Village	1,177	1,920
5	Maintenance and Operation (M&O) Extension	4,811	6,450
18	Stadium Shops / Facilities Offices	17,043	23,236
19	Student Health & Activities	42,882	59,644
	Total Demolition	**182,645**	**279,311**
	Proposed New Construction		
A	Pico 1 Business Replacement	49,708	76,474
B	Pico 2 Drescher Hall Replacement	64,832	99,742
C	Police Headquarters	8,400	12,000
D	Student Union	27,300	42,000
E	Maintenance and Operations	16,900	26,000
	Total New Construction	**167,140**	**256,216**
	Proposed Renovation		
Z	Life & Physical Sciences Complex	56,801	98,400
Y	Library & Media Center	78,020	108,673
		134,821	**207,073**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.

B. ENVIRONMENTAL ANALYSIS

a. Aesthetics

i. Scenic Vista / Scenic Resources

As there are no views of scenic vistas available through, or scenic resources on the Project Site, the Reduced Density Alternative's impacts with respect to these issues would be less than significant and the same as under the Proposed Project.

ii. Scenic Quality

1. Construction

Similar to the Proposed Project, the Reduced Density Alternative would involve intermittent and temporary construction activities within the Main Campus that would have the potential to create unsightly views which can negatively affect the environment. While much of the planned construction activity would be internal to the SMC Main Campus and would not be visible from the surrounding areas, some demolition and construction activities are located along the Pico Boulevard and Pearl Street frontages and thus would be visible to surrounding land uses and passing motorists. 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. The Reduced Density Alternative would also implement Mitigation Measure AES-1, which states that visual blight associated with temporary and intermittent construction activities during the buildout of the Project would be effectively screened from public view. As such, the Reduced Density Alternative's temporary aesthetic impacts during construction would be reduced to less than significant levels after mitigation and would be similar to the Proposed Project's less than significant impacts after mitigation.

2. Operation

Similar to the Proposed Project, the Reduced Density Alternative includes the demolition of existing temporary and permanent buildings, and the new construction of 256,216 gross square feet of building area including the Pico 1 Business Replacement Building, the Pico 2 Dresher Hall Replacement Building, a new police headquarters, a new student union, a new maintenance and operations facility. The proposed scale, massing, and setbacks of these five new buildings would be the same as the Proposed Project. These buildings would not cast new shadows on any sensitive land uses and would match the existing context and will blend seamlessly into the existing campus that would allow for a seamless transition to the neighboring buildings while also providing visual interest while moving down Pearl Street and Pico Boulevard.

Because the Reduced Density Alternative would not demolish the Business and Art Complex buildings on the Main Campus, this alternative would provide less open space, which are intended to provide welcoming landscaping and outdoor event space. Thus, the Reduced Density Alternative would provide more massing and increased height compared to the Proposed Project. Furthermore, this alternative would not provide the benefit of improving the physical conditions of the Pearl Street buildings or improving pedestrian pathways and campus entrances, and thus, would not improve the quality and character of the campus open space. Therefore, visual character impacts under the Reduced Density Alternative would be less than significant but greater than the Proposed Project.

iii. Light and Glare

Because the Reduced Density Alternative would not demolish the Business and Art Complex buildings on the Main Campus, this Alternative would provide more massing and increased height across the entire campus compared to the Proposed Project. Therefore, light and glare impacts would be less than significant but greater than the Proposed Project's less than significant impacts.

iv. Shade and Shadow

The Draft EIR determined the Proposed Project's buildings would result in less than significant impacts with respect to shade and shadow. Because the Reduced Density Alternative would not demolish the Business and Art Complex buildings on the Main Campus, this Alternative would provide more massing and increased height compared to the Proposed Project, which would still result in less than significant shade and shadow impacts. Since this Alternative would not include the Pearl Street replacement buildings, which would increase the existing building heights of the Campus Events, Environmental Center, and Auxiliary Services buildings, shade and shadow impacts from these buildings would be less than the Proposed Project's less than significant impacts.

b. Air Quality

i. Plan Consistency

The Reduced Density Alternative would include the demolition, rehabilitation and new construction of buildings on an existing college campus that is located near transit within a SCAG-designated High Quality Transit Area (HQTA). Similar to the Proposed Project, the Reduced Density Alternative is not growth inducing and would not generate additional vehicular traffic. Thus, the Reduced Density Alternative would advance regional planning goals to reduce VMT and related mobile source air quality emissions. Furthermore, it is anticipated the Reduced Density Alternative would not directly increase population in the area. It is not anticipated that the number of faculty would significantly increase, since the 2024 Master Plan Update focuses on efficiencies and would result in a net decrease on total developed floor area. Thus, the Reduced Density Alternative would not result in a significant increase to population or employment growth and would be accounted for in the Citywide and regional population projections provided by SCAG's 2020-2045 RTP/SCS and the 2024-2050 RTP/SCS. Thus, the Reduced Density Alternative would be consistent with the population, housing, and employment projections of the AQMP.

As discussed in more detail below, neither regional nor localized construction and operational emissions would exceed the applicable significance thresholds. As such, the Reduced Density Alternative would not increase the frequency or severity of existing air quality violations, cause or

contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMD, and impacts would be less than significant.

Thus, the Reduced Density Alternative would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Reduced Density Alternative would be consistent with the goals and policies of the 2022 AQMP and the 2020-2045 RTP/SCS and 2024-2050 RTP/SCS of reducing regional VMT and the related vehicular air emissions. Therefore, the Reduced Density Alternative would not conflict with the control measures of SCAQMD's 2022 AQMP.

Additionally, similar to the Proposed Project, the Reduced Density Alternative would continue to provide trip-reducing characteristics (free transit ridership) and would not conflict with the goals and targets adopted by SMC's Board of Trustees related to air quality, and impacts related to consistency with the applicable air quality policies would be less than significant.

In conclusion, based on this Alternative's consistency with the AQMP's population growth and the less-than-significant regional and localized air quality impacts, as well as the Alternative's reduced vehicle trips, VMT and emissions, the Reduced Density Alternative would be consistent with applicable SCAQMD and SCAG air quality policies. Therefore, the Reduced Density Alternative would not conflict with or obstruct implementation of the applicable air quality plan, and impacts associated with plan consistency would be less than significant and similar to the Proposed Project's less than significant impact.

ii. Construction

1. Regional Emissions

It is anticipated that full build-out of the Reduced Density Alternative would occur over a 7-year period with construction beginning in 2025 and final build-out occurring in year 2032. The construction schedule assumes a four-year timeline for Phase 1 and three years for Phase 2. The anticipated construction phasing plan by building volume is shown in Table IV.B-6, below.

Table V-4
Reduced Density Alternative Anticipated Phasing Plan

Bldg #	ACTIVITIES	AREA	
		ASF	GSF
Phase 1			
	Demolition		
1	Pico Classroom Complex	12,175	18,014
17	Math Complex	27,308	44,872
22	Drescher Hall	64,761	111,145
23	Pico Village	8,190	8,640
27	Campus Police A	1,111	1,400
27	Campus Police B	1,310	1,990
28	Campus Police Annex	1,877	2,000
44	Faculty Village	1,177	1,920
	Subtotal	**117,909**	**189,981**
	New Construction		
A	Pico 1 Business Replacement	49,708	76,474
B	Pico 2 Dresher Replacement	64,832	99,742
C	Police Headquarters	8,400	12,000
	Subtotal	**122,940**	**188,216**
	Renovation		
Z	Life & Physical Sciences Complex	56,801	98,400
	Subtotal	**56,801**	**98,400**
Phase 2			
	Demolition		
5	Maintenance and Operation (M&O)	4,811	6,450
18	Stadium Shops / Facilities Offices	17,043	23,236
19	Student Health & Activities	42,882	59,644
	Subtotal	**64,736**	**89,330**
	New Construction		
D	Student Union	27,300	42,000
E	Maintenance and Operations	16,900	26,000
	Subtotal	**44,200**	**68,000**
	Renovation		
Y	Library & Media Center	78,020	108,673
	Subtotal	**78,020**	**108,673**

Source: Santa Monica College Master Plan 2024 Update, DLR Group, April 2024.

The Reduced Density Alternative would include the demolition of 279,311 square feet, the new construction of 256,216 square feet, and the renovation of 207,073 square feet of existing buildings on the SMC Main Campus. The Reduced Density Alternative would include the same Phase 1 and Phase 2 demolition and construction activities and schedule as the Proposed Project. As shown in Table V-5 below, Reduced Density Alternative Estimated Peak Daily Regional Construction Emissions, the maximum daily emissions under this Alternative would be below the significance thresholds for all six criteria pollutants prior to mitigation, similar to the Proposed Project. Because this Alternative would not include Phase 3 construction activities, the Reduced Density Alternative would result in lower temporary construction emissions than the Proposed Project. Therefore, the Reduced Density Alternative's regional construction air quality

impacts would be less than significant and less than the Proposed Project's less than significant impacts.

Table V-5
Reduced Density Alternative Estimated Peak Daily Regional Construction Emissions

Construction Phase/Year	Emissions (pounds per day) [a]					
	VOC [b]	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Phase 1						
2025	2.71	25.4	25.5	0.04	2.10	1.14
2026	1.72	16.7	21.5	0.04	4.05	2.11
2027	1.50	11.4	20.9	0.03	2.32	0.80
2028	14.70	10.8	20.4	0.03	2.29	0.77
2029	0.68	5.79	9.87	0.01	0.46	0.24
Maximum Emissions Ph. 1	**14.70**	**25.4**	**25.5**	**0.04**	**4.05**	**2.11**
Daily Significance Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Phase 2						
2029	1.37	13.9	15.3	0.04	4.16	2.05
2030	1.26	9.80	15.7	0.03	1.47	0.53
2031	12.8	9.51	15.4	0.03	1.45	0.51
2032	12.8	5.15	8.79	0.01	0.35	0.19
Maximum Emissions Ph. 2	**12.8**	**13.9**	**15.7**	**0.04**	**4.16**	**2.05**
Daily Significance Thresholds	***75***	***100***	***550***	***150***	***150***	***55***
Exceed Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
[a] *The CalEEMod worksheets are provided in Appendix C to this EIR.*
[b] *As noted in the CalEEMod User Guide, VOC and ROGs are both precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

Source: CalEEMod (Version 2022.1.1.29), Parker Environmental Consultants, 2025.

2. Localized Emissions

Similar to the Proposed Project, the Reduced Density Alternative would generate localized air quality construction emissions within proximity to sensitive receptors. As shown in Table V-7, Reduced Density Alternative Localized On-Site Maximum Daily Construction Emissions, on-site emissions generated by this Alternative would not exceed the established SCAQMD localized significance thresholds. Accordingly, the emissions generated by construction activities are below the thresholds of significance for localized emissions for NO_X, CO, PM_{10} and $PM_{2.5}$ and, similar to the Proposed Project, are well within the margin of safety established to protect human health. Because this Alternative would not include Phase 3 construction activities, the Reduced Density Alternative would result in lower localized construction emissions than the Proposed Project. Therefore, localized air quality impacts resulting from construction emissions associated with the Reduced Density Alternative would be less than significant and would be reduced compared to the Proposed Project.

Table V-6
Reduced Density Alternative Localized On-Site Maximum Daily Construction Emissions

Construction Year	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Phase 1				
Demolition - 2025	24.4	23.7	1.62	1.01
Demolition - 2026	27.2	22.8	1.53	0.93
Grading - 2026	15.0	17.4	3.41	1.93
Building Construction - 2026	9.85	13.0	0.38	0.35
Building Construction - 2027	9.39	12.9	0.34	0.31
Building Construction - 2028	8.92	12.9	0.30	0.28
Paving - 2028	5.37	8.81	0.20	0.18
Architectural Coating - 2028	8.63	11.3	0.14	0.13
Maximum Localized Emissions Phase 1	**27.2**	**23.7**	**3.41**	**1.93**
Phase 2				
Demolition – 2029	10.7	12.4	1.24	0.50
Grading – 2029	11.1	13.8	3.25	1.78
Building Construction – 2029	8.89	11.6	0.26	0.24
Building Construction – 2030	8.7	11.6	0.24	0.22
Building Construction – 2031	8.46	11.5	0.23	0.21
Architectural Coating – 2031	2.21	2.65	0.02	0.02
Architectural Coating – 2032	2.20	2.64	0.02	0.02
Maximum Localized Emissions Phase 2	**11.1**	**13.8**	**3.25**	**1.78**

Notes:
[a] *Calculations for localized PM_{10} and $PM_{2.5}$ emissions reflect compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings.*
[b] *The localized thresholds for all phases are based on a receptor distance of 25 meters in SCAQMD's SRA 2 for a Project Site of 5 acres.*
[c] *The localized thresholds listed for NOx in this table takes into consideration the gradual conversion of NO_X to NO_2. The analysis of localized air quality impacts associated with NOx emissions is focused on NO_2 levels as they are associated with adverse health effects.*
Source(s): SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009; Sample Construction Scenarios for Projects Less than Five Acres in Size. CalEEMod worksheets are provided in Appendix C to this EIR. Parker Environmental Consultants, 2025.

3. Toxic Air Contaminants

Similar to the Proposed Project, construction toxic air contaminant (TAC) emissions generated by Reduced Density Alternative would be short-term and would also result in a less than significant impact. This Alternative would require less construction activities with fewer haul trucks and an overall decrease in use of heavy-duty diesel trucks as compared to the Proposed Project. Therefore, the air quality impacts under the Reduced Density Alternative would be less compared to the Proposed Project's less than significant impacts.

iii. Operational

1. Regional Emissions

As shown in Table V-7, Reduced Density Alternative Maximum Daily Regional Operational Emissions at Full Buildout, after netting out emissions associated with the existing uses, operation of the Reduced Density Alternative upon full buildout would generate a net reduction of 20.6 lbs/day of VOC, 11.6 lbs/day of NO_X, 165 lbs/day of CO, 0.2 lbs/day of $SO_{2,}$, 3 lbs/day of PM_{10}, and 0.8 lbs/day of $PM_{2.5}$. Regional operational emissions under the Proposed Project and Reduced Density Alternative would not exceed the SCAQMD's maximum daily regional operational thresholds of significance for all criteria pollutants, and impacts from regional operational emissions would be less than significant.

Table V-7
Reduced Density Alternative Maximum Daily Regional Operational Emissions at Full Buildout

Emissions Source	Emissions in Pounds per Day [a]					
	VOC [b]	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	48.8	32.7	392	1.05	111	28.4
Area	38.9	--	95.1	0.01	0.17	0.13
Energy	0.71	13.0	10.9	0.08	0.98	0.98
Stationary	1.89	7.34	8.70	0.04	0.59	0.59
Total Alternative Emissions	**90.4**	**53.0**	**507**	**1.17**	**112**	**30.1**
Less Existing Uses [c]	*(111)*	*(64.9)*	*(672)*	*(1.37)*	*(115)*	*(30.9)*
Net Alternative Emissions	**(20.6)**	**(11.6)**	**(165)**	**(0.2)**	**(3.0)**	**(0.8)**
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
[a] *The CalEEMod worksheets are provided in Appendix C to this EIR; numbers may not add up due to rounding. All values shown for the Mitigated Project at Full Buildout reflect the CalEEMod values for operational emissions with mitigation as the mitigation features selected in the model reflect compliance with the 2022 Title 24 Building Energy Efficiency Standards, the College's Net Zero Energy Building goal, and transit subsidies.*
[b] *As noted in the CalEEMod User Guide, VOC and ROGs are both precursors to ozone so they are summed in the CalEEMod report under the header for ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*
[c] *Includes existing conditions of entire SMC Main Campus.*

Source: CalEEMod (Version 2022.1.1.29), Parker Environmental Consultants, 2025.

When compared to the Proposed Project, the Reduced Density Alternative's regional operational emissions for all criteria pollutants would be higher than the Proposed Project, since this Alternative would continue the operation of five existing buildings. Thus, the Reduced Density Alternative's regional operational emissions would be greater than the Proposed Project.

2. Localized Emissions

Similar to the Proposed Project, operation of the Reduced Density Alternative would generate emissions associated with on-site area sources, energy consumption, and stationary point sources (such as emergency generators). Table V-8, below, shows the net amount of on-site emissions that would be generated by the Reduced Density Alternative. As shown, on-site localized emissions would not exceed any of the localized thresholds at full buildout under this Alternative. Similar to the Proposed Project, localized air quality impacts resulting from operation emissions associated with this Alternative would not expose sensitive receptors to substantial pollutant concentrations. Because the Reduced Density Alternative would provide more building floor area than the Proposed Project, this Alternative's operational localized emissions would be higher than the Proposed Project. Therefore, localized on-site operational emissions would be less than significant under this Alternative and greater than the less-than-significant localized operational air quality impacts that would occur under the Proposed Project.

Table V-8
Reduced Density Alternative Localized On-Site Maximum Daily Operational Emissions

Operational Phases	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Operational Emissions at Full Buildout (Phases 1 and 2)				
Area	0.80	95.1	0.17	0.13
Energy	13.0	10.9	0.98	0.98
Stationary	7.34	8.7	0.59	0.59
Maximum Localized Operational Emissions [a]	**21.14**	**114.7**	**1.74**	**1.7**
Less Existing Localized Operational Emissions	*(15.11)*	*(112.62)*	*(1.6)*	*(1.56)*
Net Localized Operational Emissions	**6.03**	**2.08**	**0.14**	**0.14**
SCAQMD Localized Significance Thresholds [b]	221	1,531	3	2
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
[a] *The CalEEMod worksheets are provided in Appendix C to this EIR.*
[b] *The localized thresholds for all phases are conservatively based on a receptor distance of 25 meters in SCAQMD's SRA 2 for a Project Site of 5 acres.*
[c] *Source(s): SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009; Sample Construction Scenarios for Projects Less than Five Acres in Size. Parker Environmental Consultants, 2025.*

3. Toxic Air Contaminants

Similar to the Proposed Project, the Reduced Density Alternative would continue the use of institutional and academic land uses and would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic TACs. Therefore, no significant toxic airborne emissions would result from the operation of the Reduced Density Alternative**.** Similar to the Proposed Project, potential air toxic impacts to sensitive receptors from TAC emissions from the Reduced Density Alternative would also be less than significant.

c. Cultural Resources

i. Historical Resources

Similar to the Proposed Project, the Reduced Density Alternative would include the demolition of 11 buildings on the SMC Main Campus. As concluded in Section IV.C, Cultural Resources, none of the buildings on the Project Site are considered historical resources. Therefore, the development of this Alternative would not result in the demolition a historical resource. Similar to the Proposed Project, the Reduced Density Alternative's demolition, construction, and renovation activities would not cause a direct substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, and impacts would be less than significant.

ii. Archaeological Resources and Human Remains

The Reduced Density Alternative would involve similar earthwork ground disturbing activities as the Proposed Project. Section IV.C, Cultural Resources, of this Draft EIR, determined there is a low potential for archaeological resources and human remains to be discovered on the Project Site, since the Project Site has been subject to past ground disturbing activities and is currently fully developed by the SMC Main Campus. However, in the unlikely event archaeological resources are discovered during construction, the Reduced Density Alternative would comply with the same regulatory compliance measures described in Section IV.C, Cultural Resources, including those set forth in California Public Resources Code Section 21083.2. In addition, the Reduced Density Alternative would comply with California Health and Safety Code Section 7050.5, in the event that human remains are encountered during ground-disturbing activities. Therefore, the Reduced Density Alternative would also result in less than significant impacts upon archaeological resources and human remains and would be similar to the Proposed Project's less than significant impacts.

d. Energy

i. Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

1. Construction

During the Phase 1 and Phase 2 of the Reduced Density Alternative development, the construction activities would be the same as under the Proposed Project for these two phases. Since this Alternative would not include Phase 3 construction activities, the short-term demand for energy during construction would be reduced when compared to the Proposed Project. As with the Proposed Project, electric equipment under the Reduced Density Alternative would be powered off when not in use to avoid unnecessary energy consumption. As such, the demand for

electricity during construction under the Reduced Density Alternative would not cause wasteful, inefficient, and unnecessary use of energy. Impacts would be less than significant and less than the Proposed Project's less than significant impacts.

2. Operational

a. Electricity

As discussed in Section IV.D, Energy, the existing electricity demand consumption by the entire SMC Main Campus is approximately 15,878,885 kilowatt hours per year (kWh/year) at the Project Site. As shown in Table V-9, below, the total electricity demand from the Reduced Density Alternative at full buildout (inclusive of Phases 1 and 2) is estimated to be approximately 14,914,693 kWh/year. When compared to the existing buildings within the Main Campus, the Reduced Density Alternative's net electricity demand would result in an overall decrease of approximately 964,192 kWh/year. Similar to the Proposed Project, the Reduced Density Alternative would also improve existing buildings with up-to-date eco-friendly building materials, systems, and features, including ENERGY STAR-rated appliances, solar generation, 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. Therefore, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources related to electricity would be less than significant under the Reduced Density Alternative.

Comparatively, the Reduced Density Alternative would provide more building square feet across the campus than the Proposed Project. Because the Reduced Density Alternative would retain the operation of five existing buildings on-site, electricity demand would be slightly higher than the Proposed Project. Thus, the Reduced Density Alternative would have an increased impact from electricity consumption when compared to the Proposed Project's less than significant impacts.

Table V-9
Reduced Density Alternative Estimated Electricity Demand at Full Buildout

Land Use	Size (gsf/spaces)	Total Electricity Demand (kWh/year) [a]
Existing Conditions		
Community College (2 yr)	1,065,931 gsf	11,655,887
Parking Structure(s)	2,860 spaces	4,222,998
Total Existing Electricity Demand:		**15,878,885**
Reduced Density Alternative		
Community College (2 yr)	1,042,836 gsf	10,691,695
Parking Structure(s)	2,860 spaces	4,222,998
Total Reduced Density Alternative Electricity Demand:		**15,100,359**
Net Electricity Demand:		**(964,192)**

Notes: sf =square feet; kWh = kilowatt-hour
[a] *SCAQMD, CalEEMod Version 2022.1.1.29, See Appendix C to this Draft EIR.*
Source: Parker Environmental Consultants, 2025.

b. Natural Gas

The existing natural gas demands for the entire SMC Main Campus is estimated to be approximately 512,520 hundred cubic feet (ccf) per year at the Project Site. As shown in Table V-10, below, the total natural gas demand from the Reduced Density Alternative at full buildout (inclusive of Phases 1 and 2) is estimated to be approximately 465,397 ccf/year. When compared to the existing buildings within the Main Campus, the Reduced Density Alternative's net natural gas demand would result in an overall decrease of approximately 47,123 ccf/year. As mentioned previously, the Proposed Project would promote energy conservation and the reduction in natural gas demand, in accordance with the policies identified in 2022 Title 24 Standards and SMC Board of Trustees, which would include improving and replacing existing buildings with zero-net energy buildings and replacing natural gas-based systems with electric heating and cooling systems. Therefore, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources related to natural gas would be less than significant under the Reduced Density Alternative.

The Reduced Density Alternative would provide more building square feet across the campus than the Proposed Project. Because the Reduced Density Alternative would retain the operation of five existing buildings on-site, natural gas demand would be slightly higher than the Proposed Project. Thus, the Reduced Density Alternative would have an increased impact from natural gas demand when compared to the Proposed Project's less than significant impacts.

Table V-10
Reduced Density Alternative Estimated Net Natural Gas Demand at Full Buildout

Land Use	Size	Total Natural Gas Demand (kBTU/year)	Total Natural Gas Demand (ccf/year) [a]
Existing Conditions			
Community College (2 yr)	1,065,931 gsf	53,097,097	512,520
Total Existing Natural Gas Demand:		**53,097,097**	**512,520**
Reduced Density Alternative			
Community College (2 yr)	1,042,836 gsf	48,215,085	465,397
Total Project Natural Gas Demand:		**48,215,085**	**465,397**
Net Natural Gas Demand:		**(4,882,012)**	**(47,123)**

Notes:
sf =square feet; kBTU = one thousand British thermal units; ccf = one hundred cubic feet
[a] The CalEEMod worksheets provide natural gas in one thousand British Thermal Units (kBTU). 100 cubic feet (ccf) of natural gas is equivalent to 103,600 kBTU.
Source: SCAQMD, CalEEMod Version 2022.1.1.29. See Appendix C to this Draft EIR.

c. Transportation Energy

The existing conditions net transportation energy consumption are estimated to be approximately 1,890,700 gallons of petroleum-based transportation fuel, including approximately 216,411 gallons of diesel per year and 1,674,289 gallons of gasoline per year for the entire SMC Main Campus. As shown in Table V-11, below, the Reduced Density Alternative would generate a total demand of 1,587,791 gallons of petroleum-based fuel per year, including 198,533 gpy of diesel fuel and 1,389,258 gpy of gasoline fuel. Compared to existing conditions, this would result in a net decrease of 302,909 gallons of transportation fuel.

As discussed in Section IV.D, Energy, of this Draft EIR, SMC's Main Campus is supported by an extensive network of bus and light rail connections and is served by bus lines operated by the City of Santa Monica's Big Blue Bus. Ridership for SMC students and staff is free on the Big Blue Bus funded by SMC, and ridership for all SMC students is free on Metro buses and light rail through Metro's GoPass program, funded by Metro. These programs, which serve to reduce the Reduced Density Alternative's operational VMT, are anticipated to continue under the Reduced Density Alternative. Furthermore, the use of petroleum-based fossil fuel is expected to decrease in future years as the use of alternative fueled vehicles increases. As shown in Table V-11, based on the EMFAC2021 emission factors, the regional petroleum-based fleet mix is anticipated to decrease by another 4 percent from 2025 to 2032. As such, the demand for petroleum-based fuel usage during the Reduced Density Alternative's operation would not cause wasteful, inefficient, and unnecessary use of transportation energy, and impacts would be less than significant.

Table V-11
Reduced Density Alternative Estimated Transportation Energy Consumption at Full Buildout

Fuel Type	Fleet Factor (% of total)	Annual VMTs (miles) [b]	Fuel Rate (mpg) [c]	Total Fuel Demand (gallons/year)
Existing Conditions (2025)				
Diesel	4	1,856,805	8.58	216,411
Gas	91	42,242,320	25.23	1,674,289
Total	***95%*** [a]	***44,099,125***	--	***1,890,700***
Reduced Density Alternative (2032)				
Diesel	4	1,816,575	9.15	198,533
Gas	87	39,510,502	28.44	1,389,258
Total	***91%*** [a]	***41,327,077***	--	***1,587,791***
Net Transportation Fuel Demand			Diesel	***-17,878***
			Gas	***-285,031***
			Total	***-302,909***

Notes:
VMTs = vehicle miles traveled; mpg = miles per gallon
[a] *The remaining 5% percent of fleet factor during Existing Conditions and 9% of fleet factor during the Reduced Density Alternative includes electric and natural gas vehicles.*
[b] *Total Annual VMTs from Operational Mobile Sources are based on the CalEEMod worksheets provided in Appendix C to this Draft EIR.*
[c] *Fuel rates are based on EMFAC2021 (v1.0.2) Emissions Inventory, 2025 Calendar Year for Existing Conditions baseline and 2032 Calendar Year for Reduced Density Alternative (See Appendix E, Energy Calculations worksheets).*

Because the Reduced Density Alternative would be operational three years prior to the Proposed Project's estimated operational year, this Alternative's fuel rates would be higher, and the fleet mix would be less efficient than the Proposed Project. Therefore, the Reduced Density Alternative's transportation energy demand would be greater compared to the Proposed Project's less than significant impacts.

ii. Conflict with Plans for Renewable Energy or Energy Efficiency

Similar to the Proposed Project, the Reduced Density Alternative 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 Reduced Density Alternative meets all applicable energy conservation policies and regulations. SMC's Climate Change and Sustainability Policy Goals require 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 operations would comply with CAFE fuel economy standards. During construction activities, the

Reduced Density Alternative would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations. The Reduced Density Alternative would also be consistent with applicable goals, measures, and policies of programs and plans that intend to reduce the reliance on fossil fuels, GHG emissions, 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 Reduced Density Alternative would not conflict with any adopted energy conservation plans. As such, similar to the Proposed Project, the Reduced Density Alternative would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would also be less than significant.

e. Greenhouse Gas Emissions

i. Direct and Indirect GHG Emissions

1. Construction

The Reduced Density Alternative would have reduced overall construction activities than the Proposed Project as less demolition and construction would take place. The GHG emissions for the Reduced Density Alternative were calculated using CalEEMod *Version 2022.1.1.29* for each year of construction. As shown in Table V-12, Reduced Density Alternative Construction-Related GHG Emissions, the total amount of construction-related GHG emissions from Reduced Density Alternative construction would be approximately 3,560 $MTCO_2e$, with a majority of the emissions occurring during Phase 1 for the year 2026. As discussed in Section IV.E, Greenhouse Gas Emissions, the total construction emissions are amortized over 30 years and are incorporated into the Proposed Project's annualized operational emissions. Thus, the amortized construction emissions would result in approximately 119 $MTCO_2e$ per year during the life of this Alternative. Similar to the Proposed Project, the Reduced Density Alternative would result in a less than significant GHG impact, and construction GHG emissions would be slightly reduced compared to the Proposed Project.

Table V-12
Reduced Density Alternative Construction-Related GHG Emissions

Year	CO_2e Emissions (Metric Tons per Year)
Phase 1	
2025	329
2026	709
2027	646
2028	427
2029	103
Total Phase 1 Construction GHG Emissions:	***2,214***
Phase 2	
2029	354
2030	493
2031	426
2032	73
Total Phase 2 Construction GHG Emissions:	***1,346***
Total Construction Emissions:	**3,560**
Total Amortized Construction Emissions (30 Years):	**119**

Calculation data and results are provided in Appendix C, Air Quality and Greenhouse Gas Emissions Calculations Worksheets of this Draft EIR.
Source: CalEEMod Version 2022.1.1.29, Parker Environmental Consultants, 2025.

2. Operation

The Reduced Density Alternative would include the demolition of 279,311 square feet, the new construction of 256,216 square feet, and the renovation of 207,073 square feet of existing buildings on the SMC Main Campus. The operational GHG emissions for the Reduced Density Alternative were calculated using CalEEMod *Version 2022.1.1.29.* As shown in Table V-13, below, the estimated annual GHG for the Reduced Density Alternative at full buildout (inclusive of Phase 1 and 2) would be 21,131 CO_2e MTY. When compared to the existing buildings within the Main Campus, the Reduced Density Alternative's net GHG emissions would result in an overall reduction of 3,130 CO_2e MTY. The Reduced Density Alternative would provide more building square feet across the campus than the Proposed Project. Because the Reduced Density Alternative would retain the operation of five existing buildings on-site, operational GHG emissions would be slightly higher than the Proposed Project. Similar to the Proposed Project, the Reduced Density Alternative would also be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. Thus, the Reduced Density Alternative would have an increased GHG emissions impact when compared to the Proposed Project's less than significant impacts.

Table V-13
Reduced Density Alternative
Operational Greenhouse Gas Emissions at Full Buildout (2032)

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Mobile	13,960
Area	44.5
Energy	6,178
Water	123
Waste	42.3
Refrigerants	0.67
Stationary	664
Construction (Amortized)	119
Total Reduced Density Alternative Emissions:	**21,131**
Less Existing Project Site Emissions:	*(24,261)*
NET GHG Emissions:	**(3,130)**
Source: CalEEMod Version 2022.1.1.29, Parker Environmental Consultants, 2025. Calculation data and results provided in Appendix C to this Draft EIR.	

ii. Plan Consistency

As discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the 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. Similar to the Proposed Project, the Reduced Density Alternative would provide the same institutional and academic land uses and would also be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans. The Reduced Density Alternative would also provide development within walkable accessibility to transit, and the pre-installation of energy efficient ENERGY STAR-rated appliances, meeting the applicable provisions of the CALGreen Code, and meeting SMC's Climate Change and Sustainability Policy Goals. Therefore, the Reduced Density Alternative would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Thus, the Reduced Density Alternative would result in a less than significant impact, and impacts would be similar to the Proposed Project's less than significant GHG impacts.

f. Land Use and Planning

The Reduced Density Alternative would seek the same discretionary actions as the Proposed Project. As discussed in Section IV.F Land Use and Planning, 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 Land Use and Circulation Element) and the City of Santa Monica Zoning Ordinance that govern development on the Project Site. Since the Reduced Density

Alternative would provide the same institutional and academic land uses as the Proposed Project, there would be no change in discretionary requests. This Alternative would also be generally consistent with the overall intent of the applicable land use plans, policies, and development regulations that govern development on the Project Site. Similar to the Proposed Project, the Reduced Density Alternative would not conflict with local and regional plans applicable to the Project Site. Land use impacts would be less than significant under the Reduced Density Alternative, and similar to the Proposed Project's less than significant land use impacts.

g. Noise

i. Construction

1. Noise and Groundborne Vibration

As discussed in Section IV.G, Noise, construction noise impacts for Phase 1 and Phase 2 construction would be less than significant, and Phase 3 construction activities would exceed the applicable significant noise impact threshold for three sensitive receptors prior to mitigation. The construction-related noise and groundborne vibration impacts associated with Phase 3 of the Proposed Project would be reduced to less than significant with the incorporation of mitigation measures. The day-to-day noise levels during active construction periods would be the same as the Proposed Project under the Reduced Density Alternative. However, since the Reduced Density Alternative only includes Phase 1 and Phase 2 construction activities, impacts would be less than significant and would not require mitigation. The construction code compliance requirements and project design features identified in Section IV.G, Noise, would also be applicable to this Alternative. Thus, construction noise and vibration impacts under the Reduced Density Alternative would avoid the Proposed Project's significant impacts prior to mitigation. Additionally, as the Reduced Density Alternative would require less soil export, off-site roadway noise impacts associated with haul trucks would also be reduced. Therefore, the Reduced Density Alternative would result in less than significant construction noise and vibration impacts and would be less than the Proposed Project's less than significant impacts with mitigation.

ii. Operational

1. Noise

The operational noise generated under the Reduced Density Alternative would not introduce any new activities or land uses to the Project Site with the potential to create operational noise impacts or impact off-site sensitive receptors with potential noise impacts. Operational noise on-site would continue to be typical of the student activities and educational uses including 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, consistent with existing uses on-site. Under the Reduced Density Alternative, no impact with respect to on-site noise would occur with respect to operational noise.

Comparatively, both the Proposed Project and Reduced Density Alternative do not propose to increase parking spaces or overall building square feet across the SMC Main Campus. The Proposed Project would not result in the generation of additional employees or students. Therefore, operational noise impacts under the Reduced Density Alternative would be similar to the Proposed Project's less than significant impact with respect to operational noise.

2. Groundborne Vibration

The Reduced Density Alternative would continue the existing institutional and academic uses on-site. The Reduced Density Alternative would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Groundborne vibration occurs at the Project Site and immediate vicinity under existing conditions from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on nearby local roadways. The Reduced Density Alternative would result in no change to the existing groundborne vibration at the Project Site compared to existing conditions. Thus, the Reduced Density Alternative would result in no increased groundborne vibration. No impacts related to groundborne vibration would occur under the Reduced Density Alternative. Similarly, the Proposed Project does not propose changing the existing institutional land uses. Therefore, impacts would be similar to the Proposed Project's less than significant impacts with respect to operational groundborne vibration.

C. IMPACT CONCLUSION

As discussed above and summarized in Table V-1, above, the Reduced Density Alternative would result in no impacts or less than significant impacts under all the assessed environmental impacts categories in the EIR. In comparison to the Proposed Project, the Reduced Density Alternative would have reduced less-than-significant impacts with respect to construction-related impacts (air quality emissions, energy consumption, GHG, and construction noise and vibration), since this Alternative would not include any Phase 3 construction and development. Additionally, this Alternative would result in less than significant construction noise impacts and would not require mitigation, compared to the Proposed Project's less than significant impacts with mitigation. Furthermore, since the Reduced Density Alternative would provide more gross building area than the Proposed Project, this Alternative would result in increased less-than-significant operational impacts with respect to air quality, energy, and GHG. Similar to the Proposed Project, the Reduced Density Alternative would also be consistent with policies, programs and plans that intend to reduce air quality emissions, the reliance on fossil fuels, GHG emissions, energy demand, and promote overall public health. Moreover, the Reduced Density Alternative would result in similar less-than-significant impacts as the Proposed Project with respect to aesthetics,

cultural resources, and land use and planning, since this Alternative would also modernize the existing SMC Main Campus.

D. RELATIONSHIP OF THE REDUCED DENSITY ALTERNATIVE TO THE PROJECT OBJECTIVES

The Reduced Density Alternative would demolish, replace, and/or renovate the outdated buildings on the SMC Main Campus that require upgrades. This Alternative would meet a majority of the Project objectives listed above and in Section II, Project Description. Specifically, the Reduced Density Alternative would meet the underlying purpose of the Proposed Project to transform an aging college campus into a modernized and upgraded campus to better serve SMC students, faculty, and administration. Additionally, the Reduced Density Alternative would meet the objectives of modernizing and upgrading the existing on-site buildings to currently meet the students' needs and provide a better student and academic experience.

The Reduced Density Alternative would improve the visual appearance and appeal of the existing SMC Main Campus, by replacing older and run-down academic buildings with more modern, cohesive, and efficient buildings that provide better campus connectivity. The Reduced Density Alternative would address aging, dysfunctional and outdated buildings on the Main Campus by demolishing 11 existing buildings and constructing 8 new replacement buildings, as well as renovating two buildings. The Reduced Density Alternative would demolish temporary buildings that were never intended as permanent structures (M&O Extension Building, Math Complex, Pico Village, Pico Classroom Complex, and Faculty Village). This would achieve the objective to decrease overall building area through greater efficiencies and comprehensive planning. The Reduced Density Alternative would also support the objective to beautify and activate Pico Boulevard by demolishing Drescher Hall, Pico Classroom Complex, and Pico Village and to place active ground-level activity and create an appealing and welcoming bus arrival plaza.

By omitting Phase 3 demolition and construction, the Reduced Density Alternative would retain the Business Building and Art Complex. The Proposed Project intended the Arts program to move to the new Art Replacement building on 14th Street and Pico Boulevard (currently under construction) and the scholastic programs offered in the Business Building to the Pico 1 and Pico 2 replacement buildings. This movement of programs would result in the redundancy of these buildings; thus, the Proposed Project would demolish these two buildings and replace them with open space. By retaining the Business Building and Art Complex under the Reduced Density Alternative, this Alternative would not support the objective to replace dysfunctional buildings. Additionally, the Reduced Density Alternative would reduce the proposed open space designated for the Welcome Lawn, Organic Learning Garden, the Student Services Center outdoor event space, Amphitheater and event plaza, and new Quad. This Alternative would not improve internal student and pedestrian circulation to Lots 3 and 4 or visitors to the pool. Thus, the Reduced Density Alternative would provide less landscaping and recreational space for relaxation and student activities.

Furthermore, the Reduced Density Alternative would not replace three buildings along Pearl Street (Campus Events, Environmental Center, and Auxiliary Services). Thus, the Reduced Density Alternative would not support the objective to encourage setbacks and pedestrian pathways that would improve outdoor mobility, nor would this Alternative improve the streetscape elements along Pearl Street, such as plantings, shade trees, seating, and lighting.

As such, the Reduced Density Alternative would meet the primary goal of addressing aging, dysfunctional and outdated buildings on the Main Campus and providing a more efficient learning environment. However, this Alternative would provide less open space and recreational activities for the students and faculty.

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VI. OTHER CEQA CONSIDERATINS

A. SIGNIFICANT AND UNAVOIDABLE IMPACTS

a. Introduction

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

b. Summary of Significant and Unavoidable Impacts

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, all impacts associated with the development of the Proposed Project would be less than significant or reduced with mitigation to less than significant. 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 unavoidable environmental impacts are anticipated to occur as a result of the Proposed Project.

B. REASONS WHY PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(c) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications, and the reasons why the Proposed Project is being proposed, notwithstanding their effect, should be described.

Based on the environmental analysis in Section IV, Environmental Impact Analysis, the environmental impacts associated with 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 EIR. There would be no significant unavoidable impacts with the implementation of the Proposed Project. As such a statement of overriding considerations is not required.

C. SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(d) of the State CEQA Guidelines states:

> *"Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*

The Proposed Project would necessarily consume limited, slowly renewable and non-renewable resources during construction of the Proposed Project and would continue throughout its operational lifetime. Slowly renewable and non-renewable resources consumed by the Proposed Project would primarily include: (1) building materials (i.e., lumber, concrete, iron and other metals); (2) fossil fuels for the transportation of goods and people to and from the Project Site.

Construction of the Proposed Project would require consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as diesel, gasoline and oil, would also be consumed in the use of construction vehicles and equipment.

Construction and operation of the Proposed Project would result in the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources in the future. However, as discussed in Section IV, Environmental Impact Analysis, of this Draft EIR, while the commitment of such resources could potentially result in both primary and secondary impacts, the Proposed Project's use of nonrenewable resources would be on a relatively small scale and consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions. Furthermore, as discussed in Section IV, Environmental Impact Analysis, of this Draft EIR, the Proposed Project would result in an overall net decrease in operational air quality emissions, energy consumption (electricity, natural gas, and transportation energy), and greenhouse gas emissions, since the overall building square feet would decrease at full buildout of the Proposed Project. When compared to existing conditions, the use of such resources would not be used in a wasteful manner.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Proposed Project. However, the consumption of natural resources associated with the Proposed Project would be of a relatively small scale and would be consistent with regional and local growth forecasts in the City of Santa Monica and the Southern California region as a whole. Therefore, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area and are in part balanced against existing uses. Thus, although irreversible environmental changes would result from the Proposed Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by the Proposed Project construction and operation is justified.

D. GROWTH INDUCING IMPACTS

Section 15126.2(e) of the State CEQA Guidelines requires a discussion of the ways in which a proposed project could be growth-inducing. This would include ways in which the project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(e) requires an EIR to:

> *"Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is beneficial, detrimental, or of little significance to the environment."*

The Proposed Project would include demolition, construction, and renovations within an existing college campus. The Proposed Project would involve the demolition of approximately 360,100 gross square feet (gsf) of existing temporary and permanent buildings, and the new construction of five new major buildings (approximately 265,216 gsf), and the renovation 207,073 gsf to two existing buildings on the Santa Monica College Main Campus. The Project would result in a net decrease in building area and would not accommodate additional growth above SMC's historic student enrollment.

During construction, the Proposed Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the vicinity of the Project Site as a direct consequence of working on

the Proposed Project. Therefore, the Proposed Project would not be considered growth inducing from a short-term employment perspective. Rather, the Proposed Project would provide a benefit by providing new employment opportunities during the construction period.

Operation of the Proposed Project would result in a net decrease of building floor area on-site and is not anticipated to exceed prior enrollment projections. The Proposed Project does not include any new development that would increase employment or population. The Proposed Project would be considered new construction of educational facilities that would not result in student enrollment increase. Therefore, the Proposed Project would not have the potential to induce substantial unplanned population growth. The Proposed Project would result in a negligible increase in the City's population and employment growth forecasts and would be within SCAG's regional population growth projection.

The Project Site is adequately supported by existing roadways and is already served by existing infrastructure associated with sewer systems, potable water delivery systems, electricity, and natural gas. Thus, the Proposed Project would result in less than significant impacts with respect to impacts on local roadways and infrastructure.

Overall, the Proposed Project would be consistent with the growth forecast for the City of Santa Monica Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled (VMT). In addition, the Proposed Project is considered an infill development in an area that is adequately services by existing roadways and utilities, and would not require any major roadway improvements. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

E. POTENTIAL SECONDARY EFFECTS OF MITIGATION MEASURES

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

1. Aesthetics

Mitigation Measure AES-MM-1 is included in Section IV.A, Aesthetics, of this Draft EIR to reduce impacts on visual blight associated with temporary and intermittent construction activities during the buildout of the Proposed Project. The implementation of Mitigation Measure AES-MM-1 would effectively screen active construction sites, including temporary stockpiles of demolition debris, construction equipment and staging areas, and building framework, from public view by providing fencing and plywood barriers. Therefore, implementation of Mitigation Measure AES-MM-1 would be beneficial in reducing the Proposed Project's impacts related to visual quality during construction, and would not have the potential to result in any significant adverse secondary impacts.

2. Noise

Mitigation Measures NOI-MM-1 through NOI-MM-4 are included in Section IV.G, Noise, of this Draft EIR to reduce the Proposed Project's on-site construction noise levels. Specifically, implementation of Mitigation Measure NOI-MM-1 and Mitigation Measure NOI-MM-2 (installation of temporary sound barriers along Pearl Street Properties) would reduce the noise generated by on-site construction activities at the off-site Sensitive Receptors 1 and 3. Mitigation Measure NOI-MM-3 (installation of temporary sound barriers along the Art Complex and Welcome Lawn) would reduce the noise generated by on-site construction activities at Sensitive Receptor 13. Mitigation Measure NOI-MM-4 (temporary sound attenuation to ensure interior nose levels of 50 dBA for interior classroom spaces) would reduce construction noise impacts upon on-site students and faculty. Implementation of these measures would involve minimal site preparation activities and would include positioning temporary noise barriers and/or acoustic blankets. Therefore, with implementation of Mitigation Measures NOI-MM-1 through NOI-MM-4 the Proposed Project's impacts related to construction noise would not have the potential to result in significant adverse secondary impacts.

F. EFFECTS NOT FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

An Initial Study was prepared for the Proposed Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. SMC determined through the Initial Study that the Proposed Project would not have the potential to cause significant impacts related to aesthetics – scenic vista and scenic highway; agriculture and forestry resources; air quality – odors; biological resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning – division of an established community; mineral resources; noise – airport noise; population and housing; public services and recreation; transportation; tribal cultural resources; utilities and service systems; and

wildfire. A summary of the analysis for these issue areas is provided below.

1. Agriculture and Forestry Resources

The Initial Study concluded that the Project Site is located in an urbanized and highly developed area of the Santa Monica area and zoned for Institutional/Public Lands, Neighborhood Commercial, and R-1 Residential land uses. No farmland or agricultural activity exists on the Project Site, nor are there any farmland, agricultural, or forestland activities in the vicinity of the Project Site. According to the Los Angeles County Important Farmland 2018 map, prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact to agricultural lands and forestland would occur.

2. Biological Resources

The Project Site is located in an urbanized area of the City of Santa Monica and is currently developed with the SMC Main Campus. Based on a records search using the US Fish and Wildlife Service's Information for Planning and Consultation (IPaC) database for the Project Site's boundary, there are no critical habitats at this location. Therefore, the Proposed Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service, and no impact would occur.

Additionally, no riparian or other sensitive natural vegetation communities are located on the Project Site. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

The Project Site is entirely built out with institutional land uses and does not support any natural wetland features. Therefore, the Proposed Project would not have a substantial adverse effect on State or Federally protected wetlands through direct removal, filling, hydrological interruption, or other means, and no impact to riparian or wetland habitats would occur.

Vegetation on the Project Site is limited to ornamental landscaping including trees, grass, and shrubs. As stated above, the Project Site does not contain any natural habitat or wetlands capable of supporting candidate, endangered, or special status species. However, it is possible that migratory birds may utilize portions of the Project Site on a transitory basis during migration. The Planning and Facilities Development Department enforces the Migratory Bird Treaty Act (MBTA) through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. Such measures require all contractors to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the existing trees located on the Project Site. With adherence to existing

laws and regulatory compliance measures, the Proposed Project would have a less than significant impact on migratory bird species.

Landscaping on the SMC Main Campus is limited to ornamental vegetation and trees that have been planted throughout the campus. Neither SMC, nor the City of Santa Monica has an adopted tree preservation ordinance. No native or protected trees will be removed by the Proposed Project. Thus, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

No locally designated natural communities are known to occur on or adjacent to the Project Site. Therefore, the Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, and no impact would occur.

Based on input received by the CDFW in response to the NOP, Parker Environmental staff conducted a general biological reconnaissance survey of the Project Site and surrounding areas and conducted a more thorough literature review to access the potential of the Project Site and surrounding area to support critical habitat capable of supporting the monarch butterfly (*Danaus plexippus*).

As identified in CDFW's correspondence, the Woodlawn Cemetery, located directly north of the Project site across Pico Boulevard, has been identified by the Xerces Society as an overwintering location for the monarch butterfly (*Danaus plexippus*). A summary of annual monarch butterfly data published by the Xerces Society indicates a high of 600 butterflies were observed in 2001. Over the past ten years, 15 monarch butterflies were observed ion 2016, 0 in 2020, 7 in 2021, 3 in 2022, 9 in 2023, and 3 in 2024. In December of 2024, USFWS proposed the monarch butterfly for listing as threatened under the Endangered Species Act (ESA). Under the proposed rule to list the monarch butterfly as a threatened species, approximately 4,395 acres (1,778 hectares) in Alameda, Marin, Monterey, San Luis Obispo, Santa Barbara, Santa Cruz, and Ventura Counties, California, fall within the boundaries of the proposed critical habitat designation. While it is possible for the monarch butterfly to occur on the SMC Campus on a transitory basis, the Main Campus does not contain any native milkweed plants, which is required for monarch butterfly breeding habitat.

As noted by the CDFW, overwintering groves have specific microclimate conditions that are influenced by windbreaks provided by trees, foliage, or structures that can be located more than 100 yards from what may appear to be the habitat boundary. Alteration of areas surrounding the overwintering grove could impact microclimate conditions, thereby reducing the suitability of the site for monarchs. The SMC main Campus is located 25 yards from the Woodlawn Cemetery property, across Pico Boulevard and 17th Street. The nearest proposed construction site for the 2024 Master Plan Update is located over 125 yards from the nearest grove of eucalyptus trees near the mausoleum. As such, the Project's construction activities would have no potential to

impact the microclimate at the Woodlawn Cemetery site. Impacts upon the monarch butterfly would therefore be less than significant.

3. Geology and Soils

a. Fault Rupture and Ground Shaking

Although the Project Site is situated within the seismically active Southern California region and ground shaking is likely to occur due to earthquakes caused by movement along faults within the region, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The closest surface trace of an active fault to the Project Site is a portion of the Santa Monica Fault Line, located approximately 6,400 feet north of the Project Site. Thus, the possibility of damage due to ground rupture is considered low since active faults are not known to cross the Project Site. Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project, provided that the geotechnical design criteria in the Geo-Hazard Review should be incorporated into the Proposed Project design. Sign off from the State of California Division of State Architect (DSA) would ensure that the Proposed Project meets the applicable performance measures. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture or ground shaking, and impacts would be less than significant.

b. Liquefaction

According to the City of Santa Monica Liquefaction Risk Areas Map, the Project Site is not located within an area identified as having a potential for liquefaction. The existing below grade infrastructure will remain in place. Therefore, the potential for liquefaction occurring at the Project Site is considered to be low. Therefore, no impacts associated with the seismic related hazards including liquefaction would occur.

c. Landslides

According to the City of Santa Monica Landslides Zone and High Risk Area Map, the Project Site is not located within an area identified as having a potential for slope instability. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the Proposed Project is considered low, and no impact would occur.

d. Erosion or Loss of Topsoil

Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and grading, erosion would be reduced by implementation of stringent erosion controls through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of

the Proposed Project is relatively low due to the generally level topography of the area and the existing improvements on the Project Site. The Proposed Project would comply with all applicable laws which address grading, excavations, and fills. Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil during construction.

Long-term operation of the Proposed Project would not result in substantial soil erosion or loss of topsoil. Upon completion of the Proposed Project, the Project Site would be covered by the proposed improvements, including hardscape and landscape, such that limited amounts of soil would be exposed. Thus, essentially no exposed areas subject to erosion would be created or affected by the Proposed Project. Therefore, the impacts of soil erosion during Project operation would be less than significant.

e. Expansive Soils

Construction of the Proposed Project is limited to demolition, construction, and renovations of existing buildings. No new subterranean parking or basements are proposed. Construction would entail surface grading and minor utility relocations for surface water runoff, conduit to install lighting fixtures, and connections to storm drains. The existing below grade infrastructure will remain in place. The Proposed Project would comply with all applicable laws which address safe construction, including building foundation requirements appropriate to site conditions. Therefore, no impact would occur with respect to expansive soils.

f. Septic Tanks

The Project Site is located in a developed area of the City of Santa Monica, which is served by a wastewater collection, conveyance and treatment system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems would occur.

g. Paleontological Resources

The Project Site has been subject to extensive grading and excavation associated with the buildout of various buildings and underground utilities parking structures without any known discovery of paleontological resources. As such, the Project Site is not known to contain any unique paleontological resources or geologic features. While the potential discovery of paleontological resources within the Project Site is considered low, there remains a potential for the unanticipated discovery of paleontological resources at sub-surface levels, which may be uncovered during future grading activities. Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of Proposed Project development, all further development activities shall halt and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. The paleontologist shall determine the

location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with Federal, State, and local guidelines. Therefore, with adherence to existing applicable laws, the Proposed Project would not directly or indirectly destroy a unique paleontological resource or unique geologic feature, and impacts would be less than significant.

4. Hazards and Hazardous Materials

a. Transport, Use, or Disposal of Hazardous Materials

Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. With respect to operation of the Proposed Project, no hazardous materials would be utilized during day-to-day operation of the Proposed Project other than typical cleaning solvents used for classroom and janitorial purposes and landscape maintenance materials such as cleaning supplies, paints, oil, pesticides, herbicides, water disinfectants, and fertilizers. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for transport, use, storage, and disposal of such products. Furthermore, as noted in Caltrans' response to the NOP, any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will require a Caltrans transportation permit. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b. Release of Hazardous Materials

The Proposed Project would use minimal amounts of hazardous materials for classroom uses and routine cleaning. Demolition, renovation, and new construction activities would be conducted in accordance with all applicable laws and regulations. Due to the age of the structures being demolished, pre-demolition and renovation building surveys would be conducted to assess for the potential of potentially hazardous materials including but not limited to asbestos, lead-based paint, and Polychlorinated Biphenyls (PCBs). Materials sampling near current and/or former buildings would be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual, as applicable. Any imported soil and fill material would also be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's PEA Guidance Manual.

The Proposed Project would not be expected to pose any substantial potential for accident conditions involving the release of hazardous materials. Therefore, impacts relating to release of hazardous materials would be less than significant.

c. Hazardous Emissions Near Schools

The students and faculty of the SMC Main Campus, John Adams Middle School, and Will Rodgers Learning Academy are located within 500 feet of proposed construction activities and could be affected by the Proposed Project. The Proposed Project would provide appropriate regulatory compliance measures, such as adhering to the permissible hours of construction and not idling or staging haul trucks in proximity to school facilities to reduce the Proposed Project's impacts upon the nearby school facilities. Operation of the Proposed Project would not result in the use, storage or release of hazardous materials. As such, any operational impacts on the Project Site and to nearby schools would be less than significant with regulatory compliance measures incorporated. Therefore, the Proposed Project would not have the potential to emit any hazardous emissions or handle hazardous or acutely hazardous materials within one-quarter mile of an existing or proposed school site.

d. List of Hazardous Materials Site

A portion of the Project Site located at 1410 Pico Boulevard is included on a list of hazardous materials sites, specifically the California State Water Resources Control Board GeoTracker website. As of January 2000, the cleanup status of 1410 Pico Boulevard was completed, and the case was closed. Furthermore, the buildout of this property with the SMC Art Complex Replacement Project was evaluated under a separate Mitigated Negative Declaration (MND) in May 2020. As concluded in the MND, the buildout of the Art Complex Replacement Project would be less than significant with implementation of regulatory compliance measures and site-specific mitigation measures. The buildout of the Art Complex Replacement Project is currently underway as a separate project. The remaining portions of the Main Campus are not included on a list of hazardous materials sites nor regulatory databases for storing or emitting potentially hazardous materials. Compliance with mandatory State and Federal regulations would ensure that potential impacts associated with sites less than significant levels.

e. Airport Safety Hazards

The closest public airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 8 miles southwest of the Project Site. The Project Site is located within two miles of the Santa Monica Airport, which is a private airport. Furthermore, the Project Site is not located within an airport hazard area for LAX nor the Santa Monica Airport. Therefore, the Proposed Project would not result in an aviation-related safety hazard for people residing or working in the Project area, and no impact would occur.

f. Emergency Response Plan

The Proposed Project would not impair implementation of, nor physically interfere with, an adopted emergency plan. The Proposed Project would generally retain the current vehicular circulation and access points and existing parking supply. Furthermore, the Proposed Project would include new

and expanded SMC Police Department facilities that would enhance the SMC's Police Department's emergency response times on campus. Therefore, the Proposed Project's impacts related to interference with any adopted emergency response plan or emergency evacuation plan would be less than significant.

g. Wildfire Hazards

The Project Site is located in a highly urbanized area of Santa Monica and does not include wildlands or high fire hazard terrain. The Project Site is not located in a Very High Fire Hazard Severity Zone. Therefore, no impacts from wildland fires would be posed by the Proposed Project.

5. Hydrology and Water Quality

a. Surface Water and Water Quality

The Proposed Project would comply with the applicable Federal, State and local regulations, Code requirements, and permit provisions with respect to surface water quality. The Proposed Project would not include industrial discharge to any public water system and therefore would not violate any water quality standards or waste discharge requirements of the State Water Resources Control Board. Discharge of surface water runoff will have the potential to convey sedimentation and potentially hazardous chemicals and oil and grease generated during the construction process. That being said, a storm water mitigation plan will be required to ensure that surface water flows are contained on site and treated prior to entering the storm drains, which eventually discharge into the Santa Monica Bay. As such, the Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and impacts would be less than significant.

The Project Site is completely developed, and 100 percent of surface water runoff is directed to adjacent street storm drains. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns. Additionally, the Proposed Project would result in a decrease of total building floor area on-site. Existing storm drain lines serving the Project Site are located along Pico Boulevard, Pearl Street, and 16th Street. Therefore, the Proposed Project would not create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and water quality impacts would be less than significant.

b. Groundwater

Surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. The Proposed Project construction activities are anticipated to minimally excavate beneath the Project Site for building foundations, as such, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge, nor would the Project Site require temporary dewatering.

No groundwater pumping activities are included as part of the Proposed Project. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

As mentioned previously, the Proposed Project would result in a decrease in building floor area on-site, as such, the Proposed Project would not adversely impact a groundwater management plan or otherwise impede groundwater replenishment in the basin. Therefore, the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

c. Flood and Tsunami Hazards

Surface water runoff would be directed to existing storm drain infrastructure. Surface water runoff would be controlled through site design and engineering practices. Therefore, the Proposed Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site and impacts associated with the potential for off-site flooding would be less than significant.

Furthermore, the Project Site is not in an area designated as a 100-year flood hazard area. As such, the Proposed Project would not have the potential to impede or redirect floodwater flows, and a less than significant impact would occur.

The Project Site is located approximately 1.4 miles east of the Pacific Ocean. Therefore, the potential for tsunamis to adversely impact the Project Site is considered low. Additionally, the Project Site is not located within a Flood Zone or Potential Tsunami Zone. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow, and no impact would occur.

6. Mineral Resources

The Project Site is not located near any oil fields and no oil extraction activities have historically occurred on the Project Site or are presently conducted at the Project Site. Furthermore, the Project Site is not located within a mineral resource zone. No locally designated resources would be impacted by the Proposed Project. No mineral resources or mineral extraction activities currently exist on the Project Site. The development of the Proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region; nor would it result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impact would occur.

7. Population and Housing

The Proposed Project includes demolition, construction, and building renovations within an existing college campus. Full buildout of the Proposed Project would result in a net decrease of building floor area on-site and is not anticipated to exceed prior enrollment projections. The Proposed

Project does not include any new development that would increase employment or population. Therefore, the Proposed Project would not have the potential to induce substantial unplanned population growth. Additionally, no displacement of existing housing or residents would occur with the development of the Proposed Project. Therefore, no impact would occur with respect to population and housing.

8. Public Services and Recreation

a. Fire Protection

The Proposed Project is not expected to substantially increase the demand for fire service, as implementation of the Proposed Project would result in a net decrease of building floor area on-site, and no high-rise buildings are proposed. Compliance with all applicable fire and building codes, including adequate fire truck accessibility and water pressure, would be required to maintain adequate fire protection services. Furthermore, vehicle access to the Project Site would continue to be provided via existing driveways and continue to provide adequate access, including emergency access, to the Project Site. Thus, no impact would occur to fire protection services.

b. Police Protection

The Santa Monica College Police Department (SMCPD) is a dedicated, full-service police department available 24 hours a day/365 days a year, and all SMC campus buildings are secured by Campus Police. Thus, implementation of the Proposed Project would not significantly impact SMCPD police protection services in the Project area. The SMCPD has a mutual assistance agreement with the Santa Monica Police Department (SMPD), and both departments assist each other in responding to emergency situations as the need arises. The Project Site would be patrolled during construction and operation. Moreover, SMCPD services would be improved compared with the existing SMCPD facilities on the Project Site. Thus, no impact would occur to police protection services.

c. Schools

The Proposed Project would not result in the generation of additional employees, residents, or students. The schools in the Project vicinity would continue to operate as they currently do. The Project Site is located on SMC's Main Campus. The SMC Main Campus is currently developed with 1,065,931 square feet of existing gross floor area and supporting facilities including Corsair Field, swimming pools, parking structures, and other maintenance support facilities. All development of the Proposed Project would occur on SMC property. The Proposed Project's potential impact upon public school services would result in no impact.

d. Parks and Recreation

The Proposed Project would provide additional recreational open space for SMC students and the surrounding community. Therefore, rather than increasing demand on local parks and recreational facilities the Proposed Project would serve to alleviate some of the existing demand on local parks and recreational facilities. Therefore, the Proposed Project would not increase demands upon public parkland and recreation facilities, and no impact would occur.

e. Libraries/Other Public Services

The Project Site includes a library on the SMC Campus, which is designed to serve the needs of the students. The availability of such resources on the Project Site reduces the demand for public libraries within the City of Santa Monica. Thus, development of the Proposed Project would not result in the need for the construction of new library facilities to serve the Proposed Project, and no impact would occur.

9. Transportation

a. Conflict Programs, Plans, Ordinances, or Policy Addressing the Circulation System

The Proposed Project would generally retain the current vehicular circulation, access points, and existing parking supply. The Proposed Project does not propose any changes to the roadways, driveway curb cuts, or bicycle lanes that are within the public right of way surrounding the Project Site. Therefore, the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

b. VMT Impact

The Proposed Project would generally retain the current vehicular circulation, access points, and existing parking supply within the existing Main Campus. The Proposed Project would be considered new construction of educational facilities that would not result in student enrollment increase. Therefore, neither a Transportation Assessment nor other further analysis of transportation impacts is required for the Proposed Project. Additionally, implementation of the Proposed Project would result in a net decrease in building floor area on-site, would retain the existing parking supply, and is not anticipated to generate any new vehicle trips to the Main Campus. As such, operational transportation impacts would be less than significant with respect to VMT.

c. Geometric Design

The Proposed Project would continue to provide the existing vehicle driveways, with no changes to access the Proposed Project. The Proposed Project would maintain the internal drive aisles. Thus, the Proposed Project is considered not to have a significant impact, as it would not lead to a substantial increase in hazards due to a geometric design feature or incompatible use. Therefore, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be less than significant.

d. Emergency Access

The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way during construction. Accordingly, any temporary construction traffic impacts would be less than significant. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the SMFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. The Proposed Project does not propose the permanent closure of any local public streets, and there would be no change to access to the Project Site. As such, the Proposed Project would not adversely affect emergency access. Therefore, the Proposed Project would not be expected to result in inadequate emergency access, and impacts would be less than significant.

10. Tribal Cultural Resources

The entirety of the Project Site has been subject to extensive grading and topological changes resulting from past development and soil grading activities, including several building foundations, a swimming pool, and two subterranean parking structures. No previous discoveries of archaeological resources have been discovered within the Man Campus boundaries. Nevertheless, in the unlikely event the qualified archaeologist identifies any artifacts or resources that are presumed to be Native American in origin, the archaeologist would consult with SMC and, if warranted, contact representatives of the Native American tribe who are traditionally and culturally affiliated with the project area. Therefore, the inadvertent discovery of tribal cultural resources impacts associated with the accidental discovery of any tribal cultural resources or human remains, including Native American resources, would be less than significant.

In response to the Native American Heritage Commission's (NAHC) response letter to the NOP, a record search of the NAHC Sacred Lands File (SLF) was requested. Based on follow up correspondence form the NAHC, the results were negative, indicating that Native American Sacred Lands have not been identified or recorded within the Project Site.

11. Utilities and Service Systems

a. Relocation or Construction of New Utilities

The Proposed Project includes the demolition of existing temporary and permanent buildings, the construction of new buildings, and renovations to two existing buildings. The existing below grade infrastructure would remain in place. As implementation of the Proposed Project would result in a net reduction of floor area, the Proposed Project would not generate an increased demand in public utilities. Since the Proposed Project encompasses renovations and a net reduction of building floor area on-site, the Proposed Project would not generate water, wastewater, electricity, natural gas, or telecommunications to such a degree that would require or result in the relocation or construction of new or expanded water, wastewater treatment, electrical power, natural gas, or telecommunications facilities. The reduction of building floor area would likely decrease the operational use/demand on public utilities on-site.

Regarding storm water drainage, as mentioned under Hydrology and Water Quality, above, surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Existing storm drain lines serve the Project Site along Pico Boulevard, Pearl Street, and 16th Street. These storm drain lines all contain LA County manholes and LA County catch basins. Additionally, Pearl Street also contains City of Santa Monica catch basins. The continued maintenance of these storm drain lines is a regulatory requirement. The Proposed Project would include minimal surface grading for the foundations of the proposed buildings. This minor grading would not have a significant impact on existing storm drainage infrastructure that would require or result in the relocation or construction of new storm water drainage lines. Once operational, the Proposed Project would continue to generate surface water runoff that would be directed to stormwater inlets in a similar manner as existing conditions. Thus, the Proposed Project would have a less than significant impact.

b. Water

All new buildings would be subject to the CAL Green Code, which prescribes mandatory water conservation standards such a low-flow plumbing fixtures, energy efficient appliances, and drought-tolerant landscaping. Thus, with a net reduction in floor area, water demand on the Project Site would likely decrease the operational water currently generated on-site. Additionally, the Proposed Project will not result in population or employment growth. Thus, the Proposed Project would have a less than significant impact upon the City's ability to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years analyzed in the City's 2020 UWMP projections.

c. Wastewater

Existing wastewater generated at the Project Site would continue to be conveyed through the municipal sewage infrastructure and would continue to be treated according to the wastewater treatment requirements enforced by the Regional Water Quality Control Board similar to existing uses. As discussed previously, the Proposed Project would result in a net reduction of building floor area on-site and would not result in new population or employment growth. Furthermore, all new buildings would be subject to the CAL Green Code, which prescribes mandatory water conservation standards such a low-flow plumbing fixtures, which would reduce the Proposed Project's water demands and decrease sewer flows. Therefore, implementation of the Proposed Project would likely decrease the operational wastewater currently generated on-site. Thus, the Proposed Project would have a less than significant impact on wastewater infrastructure and treatment capacity.

d. Solid Waste

i. Construction

During build-out of the Proposed Project, construction and demolition debris would be recycled to the maximum extent feasible. The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation and all construction and demolition debris would be delivered to a certified construction and demolition waste processing facility. The Proposed Project would also comply with AB 939, AB 341, AB 1826, and DSA waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. The amount of solid waste generated by the Proposed Project is estimated to be well within the available capacities of area landfills. The Proposed Project would not lead to an increase in solid waste generation to a degree such that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The Proposed Project's temporary construction and demolition activities would have a less than significant impact on solid waste infrastructure.

Furthermore, the Proposed Project would comply with the following applicable State and local management and reduction statutes and regulations related to solid waste. In practice, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. The Proposed Project would adhere to and comply with SB 1374 C&D waste disposal requirements. Thus, the Proposed Project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste, and construction and demolition impacts would be less than significant.

ii. Operation

The Proposed Project would result in a net reduction of building floor area on-site during operation and would not result in new population or employment growth. Thus, full buildout of the Proposed Project would reduce the net solid waste generation at the Project Site. Therefore, implementation

of the Proposed Project would likely decrease solid waste currently generated on-site, and impacts to solid waste infrastructure would be less than significant.

Additionally, the SMC Board of Trustees passed a Zero Waste Events Board Policy requiring events to use compostable ware and produce no more than 10 percent waste. The campus utilizes a large-scale composing system to reduce food waste to landfills and distant compost facilities. The recycling program, managed by the Recycling Specialist and student workers, has a collection plan for compostables, recyclables, clean paper, cardboard, pallets, and toner cartridges. As such, SMC currently recycles a combined 85 percent of its construction and solid waste, which exceeds current AB 341 diversion goals. The Proposed Project would continue to practice solid waste reduction on-site, and would comply with Federal, State, and local management and reduction statutes with respect to solid waste.

12. Wildfire

The Project Site is located in an urbanized area with no natural vegetation. The Project Site is improved with an existing academic and institutional college campus. There are no State responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site. Therefore, the Proposed Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildfires. No impact would occur with respect to wildfire hazards.

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V.II Preparers and Persons Consulted

A. Lead Agency

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

- Chris Bonvenuto, Vice President, Business & Administration
- Charlie Yen, Director, Facilities Planning and Construction
- Don Girard, Senior Director, Governmental Relations & Institutional Communications
- Dagmar Gorman, Governmental Relations & Institutional Communications

B. Project Architect

DLR Group
700 South Flower St., 22nd Floor
Los Angeles, California 90017

- Joel Wilbur, Project Manager
- Theresa O'Neil, Senior Planner
- Carlos Auces, Designer

C. Environmental Consultant

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

- Shane Parker, President
- Elise Lorenzana Cronkrite, Senior Environmental Planner
- Adrianna Gjonaj, Senior Environmental Planner

D. Historic Consultant

Historic Resources Group
12 Fair Oaks Avenue , Suite 200
Pasadena, California 91105

- Christine Lazzaretto, Managing Principal
- John LoCascio, AIA, Principal Architect
- Robby Aranguren, GIS/Technical Specialist; and Ye Hong, Associate Architectural Historian

E. Agencies Consulted

California Department of Fish and Wildlife (CDFW)
South Coast Region
3883 Ruffin Road
San Diego, CA 92123

- Victoria Tang, Environmental Program Manager

California Department of Toxic Substances Control (DTSC)
880 Cal Center Drive
Sacramento, CA 95826-3200

- Tamara Purvis, Associate Environmental Planner

California Native American Heritage Commission (NAHC)
1550 Harbor Boulevard, Suite 100
West Sacramento, California 95691

- Andrew Green, Cultural Resources Analyst

California Department of Transportation (Caltrans)
District 7
100 S Main Street, MS 16
Los Angeles, CA 90012

- Anthony Higgins, Acting LDR Branch Chief

VIII. REFERENCES AND ACRONYMS

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B. ACRONYMS AND ABREVIATIONS

AAM	Annual Arithmetic Mean
AB	Assembly Bill
AQMP	Air Quality Management Plan
Asf	Assignable Square Footage
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
cf	Cubic feet
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CH_4	Methane
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
DNL	Day-night average noise level
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FTA	Federal Transit Administration
FHWA	Federal Highway Administration
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gsf	gross square footage
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HVAC	Heating, Ventilation and Air Conditioning
Hz	Hertz
I-10	Santa Monica Freeway
ITE	Institute of Transportation Engineers

km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LOS	Level of Service
LST	localized significance thresholds
LUCE	Land Use and Circulation Element
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transit Authority
MPO	Metropolitan Planning Organization
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
O_3	Ozone
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PFC	perfluorocarbons
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PPV	Peak Particle Velocity
PRC	Public Resources Code
psi	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RD	Reporting District
RMS	Root Mean Square
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLM	Sound Level Meter

SMC	Santa Monica College
SMMC	Santa Monica Municipal Code
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SRA	source receptor area
SWFP	Solid Waste Facility Permit
SWMP	stormwater management plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TDM	Transportation Demand Management
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
ULSD	Ultra Low Sulfur Diesel
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
$\mu g/m^3$	micrograms per cubic meter