FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION



STUDENT SERVICES REPLACEMENT, **BOOKSTORE MODERNIZATION** AND

PICO PROMENADE IMPROVEMENTS PROJECT

PREPARED FOR:

SANTA MONICA COMMUNITY COLLEGE DISTRICT OFFICE OF FACILITIES PLANNING 1900 PICO BOULEVARD SANTA MONICA, CALIFORNIA 90405

PREPARED BY:

FEBRUARY 2008



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I. INTRODUCTION

Introduction

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) is the proposed Student Services Replacement, Bookstore Modernization and Pico Promenade Improvements Project ("Proposed Project"), which is located on the Santa Monica College Campus in the City of Santa Monica. The Proposed Project involves the replacement of existing uses to improve functional efficiency on the Main Campus. The Proposed Project would not generate any increases to student, faculty, or administrative personnel. The Proposed Project would result in a net decrease of 5,119 assignable square feet (asf)¹ on the campus through the demolition and inactivation of approximately 67,124 asf of campus related uses and the development of approximately 62,005 asf of campus related uses. The Proposed Project would result in a net reduction of 178 classroom seats. The Proposed Project would also involve removing 177 surface parking spaces and constructing a 500-space subterranean parking garage, resulting in a net increase of 323 on-site parking spaces. A more detailed description of the Proposed Project is included in Section II (Project Description). The Santa Monica Community College District (SMCCD) will serve as the Lead Agency pursuant to the California Environmental Quality Act (CEQA).

Project Information

Project Title: Student Services Replacement, Bookstore Modernization and Pico Promenade

Improvements Project

<u>Project Applicant:</u> Santa Monica Community College District

<u>Project Location</u>: Santa Monica Community College, Main Campus

APN: 4273-001-907

<u>Lead Agency</u>: Santa Monica Community College District

1900 Pico Boulevard

Santa Monica, CA 90405-1628 26442

The California Community Colleges Facility Inventory is based on consistent application of definitions to building areas and to the accurate classification and measurement of those areas. Assignable square feet (asf) is the sum of all areas on all floors of a building assigned to, or available for assignment to an occupant, including every type of space functionally usable by an occupant (excepting those spaces defined as circulation, custodial, mechanical and structural areas). For reference, see California Community Colleges Space Inventory Handbook, June 2007 (College Finance & Facilities Planning Division, Facilities Planning Unit, System Office, California Community Colleges).

Organization of the Initial Study/Mitigated Negative Declaration

This IS/MND is organized into six sections as follows:

<u>I. Introduction</u>: This Section provides general information about the Proposed Project such as the project title, the Project Applicant, the Project Location and the designated Lead Agency for the Proposed Project.

<u>II. Project Description</u>: This Section provides a detailed description of the Proposed Project including the environmental setting, project characteristics, related project information, project objectives, and environmental clearance requirements.

<u>III. Initial Study Checklist</u>: This Section contains the completed Initial Study Checklist showing the significance level under each environmental impact category.

<u>IV. Environmental Impact Analysis</u>: This Section contains an assessment and discussion of impacts for each environmental issue identified in the Initial Study Checklist. Where the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to less-than-significant levels.

<u>V. Preparers of the Initial Study and Persons Consulted</u>: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

<u>VI. References and Commonly Used Acronyms</u>: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

II. PROJECT DESCRIPTION

PROJECT LOCATION

The proposed Student Services Replacement, Bookstore Modernization, and Pico Promenade Improvements Project ("Proposed Project") site is located on Santa Monica College's (SMC) Main Campus at 1900 Pico Boulevard, Santa Monica, California. The Campus is generally bounded by Pearl Street to the south, 18th Street Court (an alleyway that connects to 20th Street) to the east, 16th Street to the west, and Pico Boulevard to the north. Regional access to the Project Site is provided by Interstate 10 (Santa Monica Freeway), located approximately two blocks north of the Project Site. A Regional and Vicinity Location Map is depicted in Figure II-1 on page II-2.

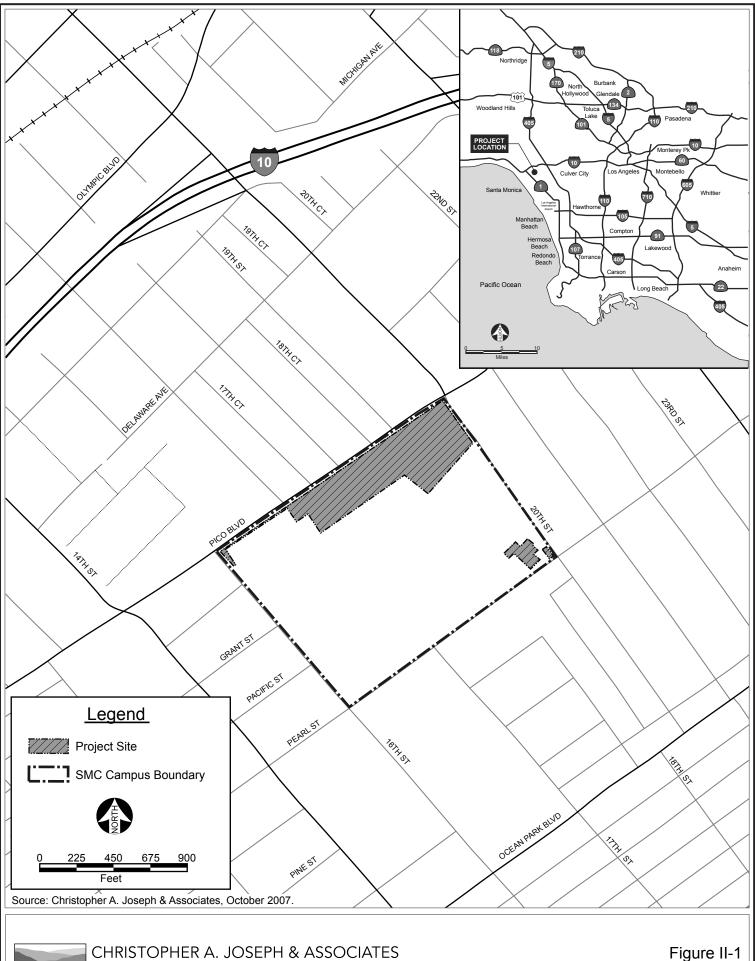
Specifically, the Project Site includes a principal area on the northern boundary of the Campus and two small areas along the south and southeast boundaries of the Campus. As shown in Figure II-2 below, the principal area of the Project Site is bordered by Pico Boulevard to the north, 18th Street Courtyard and residences to the east, existing campus uses to the south, and 16th Street to the west. Also shown in Figure II-2, two isolated areas of the Project Site located on the southern portion of the Campus are generally bordered by existing Campus uses, residences near the south and southeast boundaries of the Campus, and Pearl Street. New construction will occur only in the northern site; demolition of existing structures will occur in both the northern and southern sites.

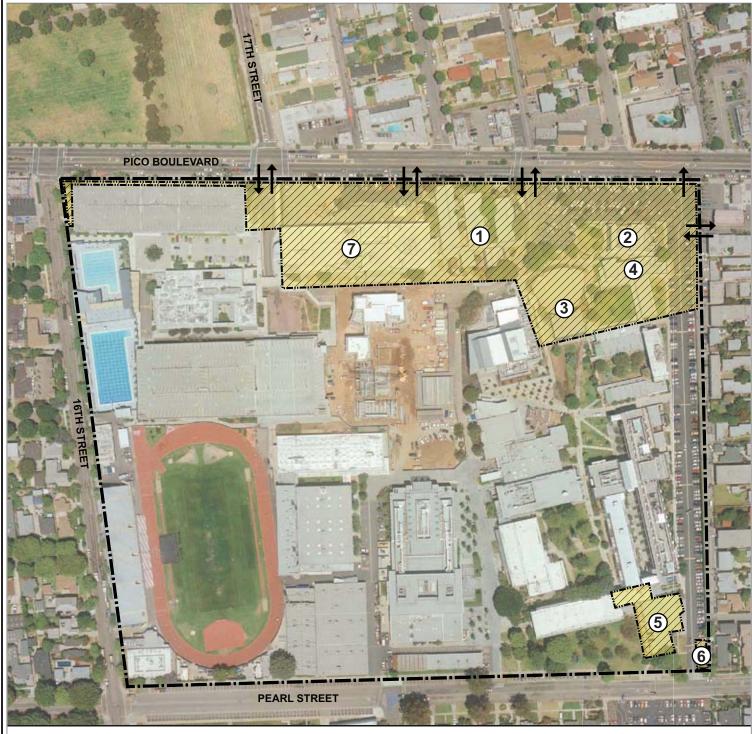
ENVIRONMENTAL SETTING

Existing Uses

The Project Site currently includes temporary and permanent facilities that house student services operations, classrooms, offices, a large assembly hall for lectures and performances, campus services operations, an outdoor amphitheater, landscaping, and surface parking uses. Specifically, these uses are identified as follows: (1) Admissions & Student Services Complex and Coffee Kiosk, (2) Concert Hall, (3) Amphitheater and Event Box Office/International Education Center, (4) Music Complex, (5) Counseling Complex and Bursar's Office, (6) Counseling Annex, (7) Drescher Hall, and surface parking uses along Pico Boulevard and the northeast side of the Campus (see Figure II-2). Access for the surface parking lot located north of Drescher Hall is provided by an ingress/egress driveway on Pico Boulevard. Access to the surface parking located on the northeast side of the Campus is currently provided with an ingress/egress driveway located on Pico Boulevard, an egress only driveway to Pico Boulevard located on the northeast corner of the Project Site, and an alley connecting to 20th Street, east of the Project Site.

For reference, Figures II-3 through II-9 provide several views of the principal area of the Project Site located on the northern portion of the Campus. Additionally, Figures II-10 and II-11 provide views of the Counseling Complex/Bursar's Office and the Counseling Annex, which constitute the two small areas of the Project Site located on the southern portion of the Campus.









SMC Campus Boundary



Project Site



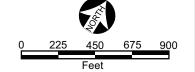
Driveways

Building Identification Key

- Admissions/
 Student Services Complex
 & Coffee Kiosk
- 7 Drescher Hall

6 Counseling Annex

- 2 Concert Hall
- 3 Amphitheater & Box Office/ International Education Center
- 4 Music Complex
- 5 Counseling Complex & Bursar's Office



Source: Santa Monica College, 2007.





View 1: View from Pico Boulevard looking southwest at the northeast corner of the Project Site.



View 2: View from Pico Boulevard looking south at the surface parking lot on the north and east sides of the Project Site.



View 3: View from Pico Boulevard looking south at the Concert Hall located on the Project Site.



PHOTO LOCATION MAP





View 4: View from Pico Boulevard looking southeast at the surface parking area on the north side of the Project Site.



View 5: View from the Project Site looking east at the surface parking lot. The Concert Hall and Music Complex can be seen in the background.



View 6: View from the east side of the Project Site looking west at the surface parking lot.



PHOTO LOCATION MAP





View 7: View from the northwest corner of Pico Boulevard and 17th Street looking southeast toward the Project Site.



View 8: View from the northwest corner of Pico Boulevard and 17th Street looking southeast toward the Project Site. Drescher Hall can be seen in the background.

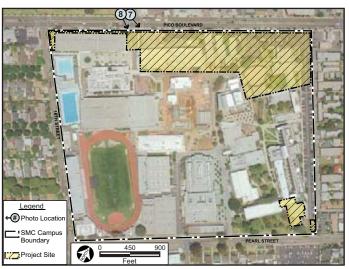


PHOTO LOCATION MAP





View 9: View from Pico Boulevard looking south at the north side of the Admissions/Student Services Complex.



View 10: View from the Project Site looking north at the south side of the Admissions/Student Services Complex.



View 11: View from the SMC Main Campus looking north at a coffee kiosk (foreground), the Admissions/Student Services Complex (background), and Drescher Hall (left).

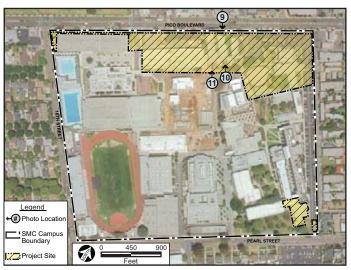


PHOTO LOCATION MAP





View 12: View from the Project Site looking south at the north side of the Amphitheater.



View 13: View from the Project Site looking down into the Amphitheater.



View 14: View from the SMC Campus looking north at the Event Box Office/International Education Center.

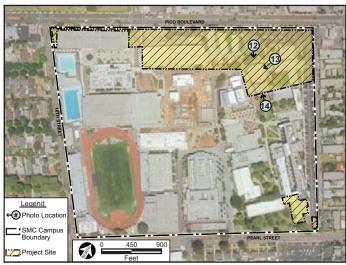


PHOTO LOCATION MAP





View 15: View from the Project Site looking southeast at the Music Complex.



View 16: View from the Project Site looking northeast toward a grass area adjacent to the Music Complex (shown in the background).



View 17: View from the Project Site looking west toward the Amphitheater and International Education Center.

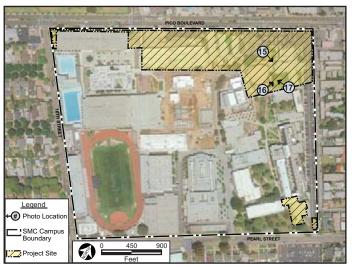


PHOTO LOCATION MAP





View 18: View from the northeast corner of the Project Site looking southwest at the Concert Hall.



View 19: View from the northeast corner of the Project Site looking south at the surface parking lot and the east side of the Music Complex.



View 20: View from the surface parking lot looking northwest at the east side of the Music Complex.

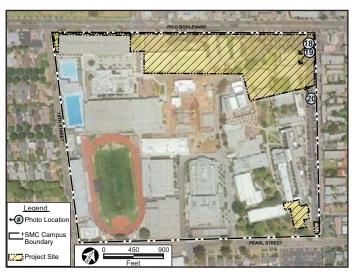


PHOTO LOCATION MAP





View 21: View from the SMC Campus looking southeast at the Counseling Annex modular buildings.



View 22: View from Pearl Street looking north at the Counseling Annex and the adjacent residential uses to the east.

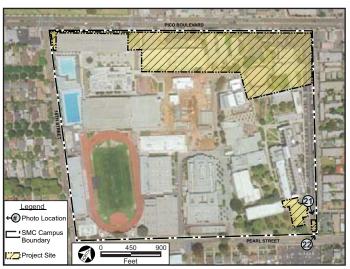


PHOTO LOCATION MAP





View 23: View from Pearl Street looking north at the Counseling Complex.



View 24: View from the SMC Campus looking northeast at the Counseling Complex.

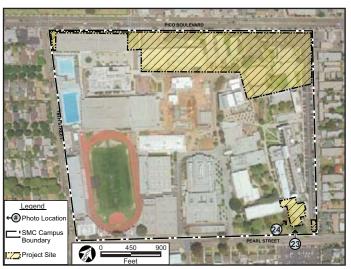


PHOTO LOCATION MAP



Surrounding Locale

The SMC Main Campus is located in an urbanized area of the City of Santa Monica. The area is characterized by a mix of residential and commercial land uses. The SMC Main Campus is primarily bordered by the following: restaurant, commercial, apartment uses, and the Woodlawn Cemetery on Pico Boulevard; one and two story single residential uses and apartments along 20th Street and 16th Street; and, one and two story single residential uses, apartments, the Campus Police Headquarters, and John Adams Middle School along Pearl Street.

Existing Programs and Operations

Existing activities at the SMC Main Campus occur Monday through Friday, generally between the hours of 7:00 a.m. and 10:00 p.m., with some classes and programming events scheduled on weekends. Typical to community college operations, class and program schedules fluctuate on a semester by semester basis in accordance with student demographics, class enrollment, and program demands. The campus includes several department buildings with classrooms and lecture halls, parking structures, administrative offices, Corsair Field, a gymnasium, a library open to the general public, a bookstore, food services, and a cafeteria.

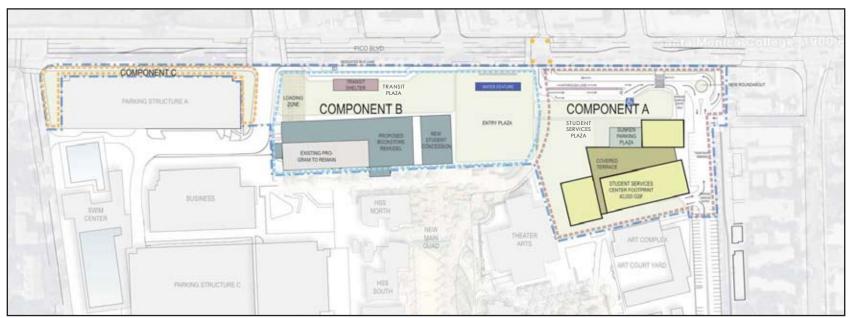
PROJECT CHARACTERISTICS

Generally, the Proposed Project would result in the development of approximately 62,005 asf of campus related uses and the demolition and inactivation of approximately 67,124 asf of campus related uses, yielding a net reduction of 5,119 asf. Additionally, 177 surface parking spaces would be removed and 500 subterranean parking spaces would be constructed, resulting in a net increase of 323 on-site parking spaces. The Proposed Project has been recognized as having three distinct components located throughout the Project Site. These components have been identified as Components A, B, and C, and are displayed in Figure II-12, Existing and Proposed Site Plan, below. Additionally, a detailed discussion of each of these components is outlined below.

In addition to the details below, the College aims to achieve Leadership in Energy and Environmental Design (LEED)[®] certification for the Proposed Project. Based on well-founded scientific standards, LEED[®] emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. In aiming to achieve LEED[®] certification, the College would increase environmental sustainability by reducing energy costs and increasing the energy efficiency for the Proposed Project and the SMC Main Campus as a whole.



Existing Site Plan



Proposed Site Plan

Source: Steinberg Architects, 2007.



Component A (Student Services Replacement Building)

Component A would involve the following activities: demolition of the Music Complex, Concert Hall, and Amphitheater; the temporary relocation of approximately 135 parking spaces located within the Component A boundary; and the construction of the Student Services Building and 3-level subterranean parking garage. The Student Services Building would be three levels above grade and would total approximately 53,505 asf.

The Student Services Replacement Building would likely contain the following campus related uses: Admissions and Records, Financial Aid, Counseling, International Education, Assessment, DSPS (Disabled Student Programs & Services), Scholarship Programs, Enrollment Development, Calworks, EOPS (Extended Opportunity Program & Services), Administration, and various other programs and services. The 3-level subterranean parking garage would include approximately 500 parking spaces.

Additionally, this component would include the following sitework along the Pico Promenade area: the Student Services Plaza, the Sunken Parking Plaza (access to subterranean parking garage), at-grade short term parking, pedestrian drop off, an information kiosk, and campus related signage. For purposes of this analysis, it is estimated that Component A would begin construction activities in December 2008 and would be completed in March 2012.

Component B (Bookstore Modernization/Drescher Hall Renovation)

Component B would involve the following activities: demolition of Drescher Hall's ground floor northern wings; demolition of the Admissions Complex, the Coffee Kiosk, the Counseling Complex/Bursar's Office, and the Counseling Annex; the relocation of approximately 42 surface parking spaces located north of Drescher Hall to the new 3-level subterranean parking garage; the replacement of Drescher Hall's ground floor northern wings with building extensions on the north and east sides of Drescher Hall; the relocation of the Campus bookstore to Drescher Hall, and the inactivation of the existing campus bookstore and conversion to use for storage; and, exterior finishing of Drescher Hall. The demolition and extension of Drescher Hall's ground floor would not result in an increase in ground floor assignable square feet as compared to the existing conditions. Upon completion of the renovation, the ground floor would include the Campus Bookstore and associated student concessions.

Component B would also include a connection to an existing City-owned reclaimed water line located under Pico Boulevard to the west of the SMC Campus. This connection would provide reclaimed irrigation (grey water) to the landscaping components provided within Component C and could eventually provide the opportunity to expand reclaimed irrigation use throughout the Campus providing significant improvements for water conservation. The connection process would involve temporary trenching beneath Pico Boulevard for a length of two to three blocks to connect to the existing line. The construction process would involve temporary lane closures or loss of street parking on a temporary basis.

Additionally, this component would include the following sitework along the Entry and Pico Promenade areas: water feature, transit plaza, transit shelter, loading zone, and campus related signage. For purposes

of this analysis, it is estimated that Component B would begin construction activities in November 2010 and would be completed in March 2012.

Component C (Landscape Improvements)

Component C would involve landscape and hardscape improvements surrounding Parking Structure A located on the northwest corner of the Campus, and the addition of campus related signage along the Pico Boulevard frontage. Implementation of Component C is estimated to begin in June 2008 and would be completed in August 2008. For reference, Figure II-13 includes an illustration of the proposed landscape plan.

Development Summary

It is anticipated that existing student services, administrative functions, and other functions currently dispersed across the Campus would be relocated to the proposed Student Services Building upon project completion. Most of these functions are contained in buildings that would be demolished upon project completion. Other existing functions are in buildings that are scheduled for retirement. The remainder of these functions are in spaces that would be made available to contain relocations made necessary by the Proposed Project, but would not be relocated to the proposed Student Services Building or the proposed Drescher Hall renovation and extension. Further, the College President's office, currently contained at a temporary off-site location, would be relocated to the proposed Student Services Building upon project completion.

It is also anticipated that existing services and classroom functions currently contained in the portion of the ground floor of Drescher Hall proposed for renovation would be relocated into the renovated space or to areas on the Main Campus that would become available due to relocations into the Student Services Building.

It is anticipated that the Proposed Project would result in a net reduction of 178 classroom seats on the Main Campus. In Fall 2007, the College's Music Department relocated to an off-site satellite campus. As part of the Proposed Project, 452 classroom seats in the Music Complex and Concert Hall would be retired and demolished; there would also be a net reduction of 16 classroom seats in the Drescher Hall renovation and extension; and there would be an addition of 290 classroom seats in the proposed Student Services Building.

It is also anticipated that the Proposed Project would result in the retirement of 1,700 outdoor seats upon demolition of the Amphitheater.

Table II-1 outlines the Proposed Campus Use Plan for the Proposed Project.

LANDSCAPE PLAN



CONCEPT

The open spaces fromed by the new Student Services Center and renavation of Dreacher Hall provide for a prominent sense of address for Service Monica College. This highly visible open space is innovational at this College reconnects with the community among Pico Silvat. Central to the design are prisosat to support the needs of students, soft and company visitors, in addition to maintaining the College's continued interest in sotherable development procedure.

Building upon the design of the Library Commons to the south, the drifty Plana continues the tow of closure, from for pedestrian to and from the comput core in addition to landscape implends that regigns the Prod Building of their facilities that the product of the computation of the production of the producting from their areas for users, allowing for the heart of the computation to sover reveal that through a vallety of appoint familiary and endour, water conserving data that inspire and a distipt through their values or delice and techniques. Water features and groupings of concept trees infestively with a large lawn area acting much in the some way as a millesting pool connecting feeting might have all breaches fall white providing storm water retending and recharge for the place local surface areas. Large, mature specimen have an externel informatify to define more infinitely grader rooms, parallel visual inferted and also shade the space. Herein enducing the Theat stands "effect that any plaguage generous urban open spaces.

Each of the present honting the new Student Services Center and renovated Drescher Hall are histored as localing dours for pedietificant anning from various reades of harapartistics for the Comput. It is important that there are sets after feel accuration residence that preserving and going provide chadle through thatches and concept trees for those develop plack up, and give a first impression of the character and quality of Sarries Merician College. The londances desting provides a translation of scale from the pediatric level to the kinger masses of adjacent architecture and the use of seat walk and naced plantes provide appointment for inferred secting. A composition of well-crafted landscape areas and open spaces strengthers the elegant architectural improvements and provide connectivity of owners and tuline paginals to create a functional and best retrievement to Santa Marcina College.

Source: Steinberg Architects, 2007.



Table II-1 Proposed Campus Use Plan

Removal of Existing Uses	Size
Music Complex & Concert Hall	-11,703 asf
Amphitheater/International Education	-10,211 asf
Admissions/Student Services Complex	-12,530 asf
Counseling, Counseling Annex, & Bursar's Office	-10,655 asf
Coffee Kiosk	-580 asf
Drescher Hall North Wings	-12,896 asf
Bookstore Inactivation	-8,549 asf
Subtotal	-67,124 asf
Additions	
Student Services Building	53,505 asf
Drescher Hall Extension	8,500 asf
Subtotal	62,005 asf
Total Net Area	-5,119 asf
Classroom Stations Calculation	
Music Complex & Concert Hall Demolition	-452 seats
Drescher Hall Renovation (net)	-16 seats
Student Services Building Classrooms & Lecture Hall Additions	290 seats
Net Classroom Stations Reduction	-178 seats

Parking and Access

The Proposed Project would involve the removal of 177 total surface parking spaces in Lots 1 and 5 along Pico Boulevard. The Proposed Project would include a 3-level subterranean parking garage that would contain approximately 500 parking spaces. Accordingly, the Proposed Project would provide an approximate increase of 323 on site parking spaces.

Existing access to the surface parking lot located north of Drescher Hall is provided by an ingress/egress driveway on Pico Boulevard. Access to the surface parking located on the northeast side of the Campus is currently provided with an ingress/egress driveway located on Pico Boulevard, an egress only driveway to Pico Boulevard located on the northeast corner of the Project Site, and an alley near the northeast corner of the Project Site.

Under the Proposed Project the parking lot and access driveway located to north of Drescher Hall would be removed. Access to the proposed 3 level subterranean parking garage would be provided by an ingress/egress driveway from Pico Boulevard. The current egress driveway onto Pico Boulevard and the ingress/egress from the alley on the east would be maintained. It should be noted the ingress driveway from the alley would not allow for direct access to the subterranean garage, and would primarily be used

for access for short term parking provided at grade along the east side of the Project Site. Additionally, a pedestrian drop off area would be provided on the north side of the Project Site near the Student Services Plaza. Pedestrian access to the subterranean parking garage would be provided through a sunken parking plaza which will be located between the Student Services Plaza and the Student Services Building. The Proposed Project is also designed to accommodate a potential bus pull on the eastbound lane of Pico Boulevard north of Drescher Hall. While the pull out improvements would be a separate project undertaken by the City of Santa Monica, it is included in the related projects list below and is analyzed within the scope of this Initial Study as a reasonably foreseeable project.

CONSTRUCTION

Construction of the Proposed Project has been identified to have two main components, Component A and B, as discussed above. Component C would not include any demolition or building construction activities, and is therefore not included in the construction analysis for square foot calculations. As previously discussed, the Proposed Project would include the removal, relocation and addition of several campus related uses. In terms of construction related impacts analyzed for the Proposed Project, the following structures would be demolished on site: the Student Services/Admissions Complex, the ground floor northern wings of Drescher Hall, the Music Complex, the Concert Hall, the Amphitheater, the Event Box Offices/International Education Center, and the Counseling Complex. These proposed demolitions would total approximately 79,022 outside gross square feet (ogsf)¹. With regard to building construction, the Proposed Project would include the construction of approximately 10,000 ogsf for the Drescher Hall extension and approximately 83,634 ogsf for the new Student Services Building, totaling approximately 93,634 ogsf. More information regarding the timing and phasing for Component A and B is provided below. The proposed project also includes the renovation of approximately 16,000 ogsf of the ground floor of Drescher Hall. During construction, existing users will park in other College parking lots with existing shuttle service to and from the Main Campus.

Component A would begin demolition of existing uses in approximately December 2008 and would finish demolition in February 2009. Excavation and shoring activities for the proposed subterranean parking garage would begin in approximately March 2009 and would end in November 2009. An approximate depth of 35 feet required for a 3-level subterranean parking garage and the excavation activities would require the removal and hauling of approximately 118,444 cubic yards of soil. The building construction of the proposed parking garage would begin in December 2009 and would end in September 2010, and would total approximately 82,835 ogsf. The construction of the proposed Student

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Outside gross square feet is defined as assignable square feet plus non-assignable square feet. Non-assignable square feet is in reference to building area not available for assignment to building occupants, but necessary for general operation. By definition, non-assignable areas consist of circulation, custodial, mechanical and structural areas. Accordingly, outside gross square feet is used for demolition and building construction analysis.

Services Building would begin in October 2010 and would end in March 2012, and would total approximately 83,634 ogsf.

Component B would begin demolition of existing uses in approximately November 2010 and would finish demolition in January 2011. The renovation of Drescher Hall and associated sitework would begin in approximately December 2010 and would end in March 2012. It should be noted that Component B would not require any extensive excavation and would not require any soil to be hauled off site.

In summary, construction of the Proposed Project could begin as early as June 2008, and the complete buildout of all components is anticipated to occur in March 2012.

Construction Worker Parking

At the peak of construction activities, it is estimated that parking for as many as 100 construction workers could be required on-site during the approximate 2-month period anticipated for the foundation construction activities required for the subterranean parking garage. Construction worker parking would be provided entirely on-site as needed in Parking Lot 1 located on the northeast portion of the Campus.

DISCRETIONARY APPROVALS

The Santa Monica Community College District is identified as the Lead Agency for purposes of complying with CEQA, and is the primary public agency responsible for approving this project. Discretionary approvals anticipated at this time may include, but are not limited to adoption of the IS/MND and all land use decisions necessary for project approval by the Santa Monica College Board of Trustees, the decision-making body of the Santa Monica Community College District. Other approvals, as necessary, will be required in accordance with all applicable laws and regulations. SMC will be required to submit building plans to the Division of the State Architect (DSA) for structural safety, access compliance, and fire and life safety approvals.

RELATED PROJECTS

In analyzing the impacts of a project, CEQA requires that those cumulative impacts (impacts associated with other geographically or characteristically related projects) also be analyzed. A total of 11 related projects were identified within the vicinity of the Project Site and are listed in Table II-2, below. The related project list was compiled from the database on file with City of Santa Monica Planning Department.² The list was then narrowed based on each related project's location with respect to the

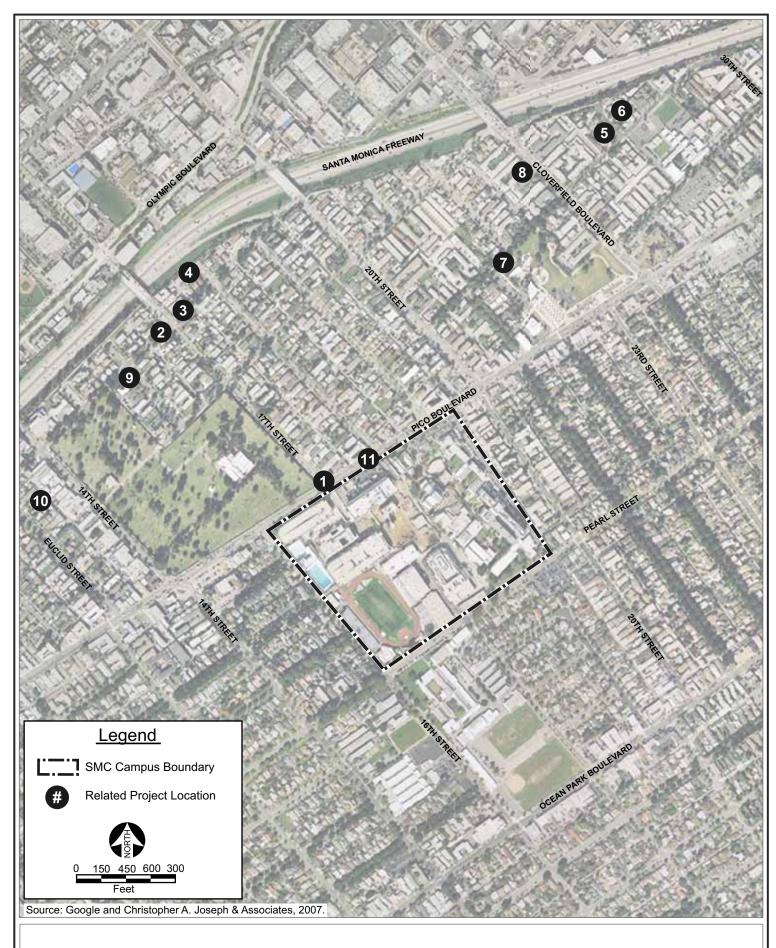
² City of Santa Monica Planning Department, Current Projects List (last updated October 17, 2007), http://santamonica.org/planning/planningcomm/currentprojectsplanning.html.

location of the Project Site. Specifically, related projects that are located south of Interstate 10 (Santa Monica Freeway), west of 30th Street, north of Ocean Park Boulevard, and east of Euclid Street are included. Additionally, the Proposed Project is also designed to accommodate a potential bus pull out on the eastbound lane of Pico Boulevard north of Drescher Hall. While the pull out improvements would be a separate project undertaken by the City of Santa Monica, it is included in the related projects list below and is analyzed within the scope of this Initial Study as a reasonably foreseeable project. It is important to note that since this project would not result in growth beyond existing conditions, the evaluation of the project's potential cumulative impacts in combination with the identified related projects are not expected to result in adverse operational cumulative impacts. Accordingly, the cumulative impacts analysis contained within this Initial Study will be focused on construction related activities. For locations of these related projects, please refer to Figure II-14, Related Projects Location Map, below.

Table II-2
Related Projects

Map No.	Address	File No.	File Date	Project Description
1	1702 Pico Boulevard	VAR 07-005	03-22-2007	Wireless Facility
2	1807 17 th Street	TM 07-007	01-04-2007	7-Unit Condominium
3	1824 Michigan Avenue	DR 06-021 TM 06-045	12-19-2006	12-Unit Condominium
4	1753 18 th Street	TM 06-043	12-14-2006	6-Unit Condominium
5	2345-49 Virginia Avenue & 1942-54 High Place	DR- 06-018	11-08-2007	47-Unit, 100% Affordable apt Bldg. in 45,995 sf w/ 80 parking spaces
6	1943-59 High Place	DR 0-017 TM 06-031	111-08-2006	45-Unit condominium in 44,159 sf w/ 90 parking spaces
7	2002-2018 21st Street	DR 06-007 TM 06-021	07-12-2006	19-Unit Condominium w/ 42 Parking spaces
8	1940 Cloverfield	DR 04-007 Tm 04-028	10-14-2006	16-Unit Condominium
9	1803-07 16 th Street	DCP 03-013 TM 03-014	09-10-2006	11-Unit Condominium
10	1825 Euclid Street	TM 07-015	6-12-2007	5-Unit Condominium
11	Pico Boulevard & 18 th Street			Big Blue Bus Pull Out

Sources: City of Santa Monica Planning Department, Current Projects List, http://santa-monica.org/planning/planningcomm/currentprojectsplanning.html, updated October17, 2007; and, Santa Monica Community College District, November 2007.



SANTA MONICA COMMUNITY COLLEGE DISTRICT

1900 Pico Boulevard Santa Monica, CA 90405

III. INITIAL STUDY CHECKLIST

LEAD AGENCY:		DATE:
Santa Monica Community College District		February 2008
PROJECT TITLE/NO.	CASE NO.	
Student Services Replacement, Bookstore Modernization and Pico Promenade Improvements Project		

PROJECT DESCRIPTION:

The Proposed Project involves the demolition and inactivation of approximately 67,124 asf of campus related uses and the development of approximately 62,005 asf of campus related uses. This would cause a net reduction of approximately 5,119 asf and 178 classroom seats. The Proposed Project would involve the removal of 177 total surface parking spaces in Lots 1 and 5 along Pico Boulevard. The Proposed Project would include a 3-level subterranean parking garage that would include approximately 500 parking spaces. Accordingly, the Proposed Project would produce an approximate increase of 323 on site parking spaces.

ENVIRONMENTAL SETTING:

The Project Site currently includes temporary and permanent facilities that house student services operations, classrooms, offices, a large assembly hall for lectures and performances, campus services operations, an outdoor amphitheater, landscaping, and surface parking uses. Specifically, these uses are identified as follows: (1) Admissions & Student Services Complex and Coffee Kiosk, (2) Concert Hall, (3) Amphitheater and Event Box Office/International Education Center, (4) Music Complex, (5) Counseling Complex and Bursar's Office, (6) Counseling Annex, (7) Drescher Hall, and surface parking uses along Pico Boulevard and the northeast side of the Campus.

PROJECT LOCATION

The proposed Student Services Replacement, Bookstore Modernization, and Pico Promenade Improvements Project ("Proposed Project") site is located on Santa Monica College's Main Campus at 1900 Pico Boulevard, Santa Monica, California. The Campus is generally bounded by Pearl Street to the south, 18th Street Court (an alleyway west of 20th Street) to the east, 16th Street to the west, and Pico Boulevard to the north. Regional access to the Project Site is provided by Interstate 10 (Santa Monica Freeway), located approximately two blocks north of the Project Site.

DETER	DETERMINATION			
On the b	asis of this initial evaluation:			
	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.			
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.			
	I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.			
	I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.			
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.			
K	EXECUTIVE VICE PRESIDENT SIGNATURE TITLE			

EVALUATION OF ENVIRONMENTAL IMPACTS:

- A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources cited in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- Once it has been determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are

- one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." Mitigation measures must describe and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
- Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- References to information sources for potential impacts (e.g., general plans, zoning ordinances) should be incorporated into the checklist. Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form. However, the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected should be used.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

\mathbf{E}	NVIRONMENTAL FACTORS							
	The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist below.							
\boxtimes	Air Quality	\boxtimes	Hydrology/Water Qua	ality	\boxtimes	Constru	action Impacts	
\boxtimes	Aesthetics	\boxtimes	Noise		\boxtimes	Manda	tory Findings of Si	gnificance
	Biological Resources		Public Services					
\boxtimes	Cultural Resources		Transportation/Traffic	e				
\boxtimes	Geology/Soils		Utilities/Service Syste	ems				
\boxtimes	Hazards & Hazardous Materials		Neighborhood Effect					
EN	VIRONMENTAL IMPACTS			ns of all potentia			than significant in	mpacts are
				Potentially Significant Impact	Signific Mit	entially ant Unless igation porated	Less Than Significant Impact	No Impact
I.	AIR QUALITY. The significant the South Coast Air Quality Mana (SCAQMD) may be relied upon t determinations. Would the projection	agen o ma	nent District ake the following					
a.	Conflict with or obstruct impleme SCAQMD or Congestion Manage				[
b.	Violate any air quality standard o to an existing or projected air qua					\boxtimes		
c.	Result in a cumulatively consider criteria pollutant for which the air (ozone, carbon monoxide, & PM federal or state ambient air quality	bas 10) ı	in is non-attainment under an applicable		[
d.	Expose sensitive receptors to subsconcentrations?	stant	ial pollutant			\boxtimes		
e.	Create objectionable odors affection of people?	ng a	substantial number		[
II.	AESTHETICS. Would the proje	ect:						
a.	Have a substantial adverse effect	on a	scenic vista?		[
b.	Substantially damage scenic resor- limited to, trees, rock outcropping or other locally recognized desira feature within a city-designated so	s, ar ble a	nd historic buildings, esthetic natural		[

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?			\boxtimes	
d.	Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				
e.	Create a new shadow that would adversely affect a shadow-sensitive use?				
III.	BIOLOGICAL RESOURCES. Would the project:				
a.	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 Game or U.S. Fish and Wildlife Service?				
b.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
c.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?				
d.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				
IV.	CULTURAL RESOURCES: Would the project:				
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?				
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?				
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		\boxtimes		
d.	Disturb any human remains, including those interred outside of formal cemeteries?				

			Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	s Less Than Significant Impact	No Impact
v.	GE	OLOGY AND SOILS. Would the project:				
a.	adve	ose people or structures to potential substantial erse effects, including the risk of loss, injury or death olving:				
	i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii.	Strong seismic ground shaking?				
	iii.	Seismic-related ground failure, including liquefaction?				
	iv.	Landslides?				
b.	Resi	ult in substantial soil erosion or the loss of topsoil?		\boxtimes		
c.	that pote	ocated on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and entially result in on- or off-site landslide, lateral eading, subsidence, liquefaction, or collapse?				
d.	of th	ocated on expansive soil, as defined in Table 18-1-B ne Uniform Building Code (1994), creating substantial s to life or property?				
e.	sept	e soils incapable of adequately supporting the use of ic tanks or alternative waste water disposal systems are sewers are not available for the disposal of waste er?				
VI.		ZARDS AND HAZARDOUS MATERIALS. uld the project:				
a.	envi	ate a significant hazard to the public or the ironment through the routine transport, use, or losal of hazardous materials?				
b.	envi acci	ate a significant hazard to the public or the ironment through reasonably foreseeable upset and dent conditions involving the release of hazardous erials into the environment?				
c.		t hazardous emissions or handle hazardous or acutely ardous materials, substances, or waste within one-				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	quarter mile of an existing or proposed school?				
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?				
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
VII.	HYDROLOGY AND WATER QUALITY. Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?			\boxtimes	
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?				
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	s Less Than Significant Impact	No Impact
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
f.	Otherwise substantially degrade water quality?				
g.	Place within a 100-year flood plain structures which would impede or redirect flood flows?				
h.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?				
i.	Inundation by seiche, tsunami, or mudflow?				
VIII.	NOISE. Would the project:				
a.	Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?				
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				
IX.	PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Fire protection?				
b.	Police protection?				
Х.	TRANSPORTATION/CIRCULATION . Would the project:				
a.	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)?				
b.	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?				
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e.	Result in inadequate emergency access?				
f.	Result in inadequate parking capacity?			\boxtimes	
g.	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				
XI.	UTILITIES. Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	new or expanded entitlements needed?				
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				
g.	Comply with federal, state, and local statutes and regulations related to solid waste?				
XII.	NEIGHBORHOOD EFFECTS.				
a.	Will the proposal have considerable effects on the project neighborhood?				
XIII.	CONSTRUCTION IMPACTS.				
a.	Will the proposal have considerable effects as a result of project construction?				
XIV.	MANDATORY FINDINGS OF SIGNIFICANCE.				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?				

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. AIR QUALITY

a) Would the project conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?

Less Than Significant Impact. A significant impact may occur if a project is not consistent with the Air Quality Management Plan (AQMP) of the applicable South Coast Air Quality Management District (SCAQMD) or the Congestion Management Plan (CMP) and would in some way represent a substantial hindrance to employing the policies or obtaining the goals of these plans.

Air Quality Management Plan (AQMP)

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the SCAQMD on June 1, 2007. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It builds on approaches taken from the 2003 AQMP for the attainment of the federal ozone air quality standard. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of SCAG's Regional Comprehensive Plan and Guide (RCPG) are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP.

Generally, the Proposed Project would result in the development of approximately 62,005 asf of Campus related uses and the demolition and inactivation of approximately 67,124 asf of Campus related uses. Accordingly, the Proposed Project would not be considered a growth inducing project. As the Proposed Project would not result in the development of any residential units, it would therefore not result in an increase in population within the region. The purpose of the Proposed Project is to provide an upgrade to outdated Campus facilities, improve operating and storage areas for current student services demands, and to provide additional on-Campus parking to satisfy the current parking demands. Accordingly, as this project would not result in an increase of services offered, it would also not result in an increase in employees required for the SMC Main Campus. As such, population growth and employment increases would not result from implementation of the Proposed Project.

Another measurement tool in determining consistency with the AQMP is to determine how a project accommodates an expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled (VMT) both within the project and the community in which it is located, and thereby minimizing air pollutant emissions, that aspect of the project is consistent with the AQMP. As stated above, the Proposed Project would not result in an increase of population or employment, and would therefore not result in an increase of VMT within the region, on the Campus, or within the community.

In addition, on a local level it is anticipated that the moderate net increase of 323 on-site parking spaces beneath the student services building would accommodate additional short-term and visitor parking needs, thereby reducing the vehicle miles traveled by visitors who are currently turned away and directed to off-site parking facilities. By accommodating additional parking spaces without increasing the assignable square feet of building area on the Campus, the project would have the potential to reduce vehicle miles traveled on surrounding roadways.

Since the Proposed Project would not result in population growth, employment increases or an increase in VMT, the Proposed Project would have no impact on the AQMP.

The Congestion Management Plan (CMP)

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the CMP was enacted by Proposition 111. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority, the local CMP agency, to implement the statutory requirements of the CMP. The countywide approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's Level of Service standards.

The CMP Project Traffic Impact Analysis (TIA) guidelines require analysis of all CMP monitoring intersections where the Project could add a total of 50 or more trips during either peak hour. Additionally, all freeway segments where a Project could add 150 or more trips in either direction during the peak hours must be analyzed.

Construction of the Proposed Project would create temporary alterations to the SMC Main Campus traffic flow due to temporary driveway closures or other access limitations during construction and demolition phases of the Proposed Project. Although implementation of the Proposed Project would generate an increase in the amount of construction vehicle trips on-site, the increase in vehicle trips would be temporary and the total number of vehicle trips during either peak hour would be less than 50 trips. Therefore the Proposed Project would be consistent with the CMP and construction traffic impacts would be less than significant.

The Proposed Project is not designed to increase employment or accommodate additional students; rather, it is solely to replace and upgrade existing facilities, and to demolish existing buildings that would no longer be required after the development. The Proposed Project would therefore not generate any new vehicle trips to the Campus. Thus, projected future traffic volumes and operating conditions under the Proposed Project scenario would be the same as or less than those described for the existing conditions. Projected future traffic volumes on Campus would be consistent with the CMP, and therefore, impacts with regard to future traffic volumes would be less than significant.

Projected future neighborhood traffic volumes and operating conditions for the Proposed Project are anticipated to slightly reduce neighborhood traffic impacts. While the Proposed Project would not generate additional students or decrease the number of students, the Proposed Project would result in the increase of approximately 323 parking spaces on the Campus. Currently, the surface parking lot located on the Project Site experiences a high number of visitors, students, and staff turned away as a result of insufficient parking during peak demand. The Proposed Project would help to accommodate this current demand, which would result in fewer cars returned to Pico Boulevard and the adjacent neighborhood in search of parking. As such, implementation of the Proposed Project would not generate additional vehicle trips within the surrounding residential neighborhood. Projected future neighborhood traffic volumes would be consistent with the CMP; therefore, impacts to future neighborhood traffic volumes would be less than significant.

Construction and operation of the Proposed Project would not generate freeway trips during the peak hours. Therefore, the Proposed Project would be consistent with the CMP and impacts to freeway traffic volumes would be less than significant.

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

Potentially Significant Unless Mitigation Incorporated. 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 substantially contribute to an existing or projected air quality violation.

Construction

As stated in Section II (Project Description), the Proposed Project would be constructed in three distinct components, A, B, and C. Component C would include sitework and landscape improvements and is therefore not included in this air quality analysis. Components A and B would be the most intrusive construction activities and are analyzed individually with their own phasing schedule.

Component A Assumptions

Component A would involve construction activities on the northwest corner of the principal Project Site area. Component A would involve the demolition of the Music Complex, the Concert Hall, the Amphitheater, and the Event Box Offices/International Education Center totaling approximately 30,586 ogsf. These demolition activities would begin in December of 2008 and last approximately three months (66 work days). The equipment utilized during this phase would include the following: one (1) rubber tired dozer, one (1) rubber tired loader, and one (1) other piece of construction equipment. It was assumed that all equipment would run for a maximum of 7 hours per day.

The site grading phase would include excavation and grading to accommodate the three levels of subterranean parking. The grading phase would begin in March of 2009 and last approximately nine months (198 work days). The equipment utilized during this phase would include the following: one (1) excavator, two (2) rubber tired dozers, and two (2) other pieces of construction equipment. It was assumed that all equipment would run for a maximum of 7 hours per day. Approximately 118,444 cubic yards of soil will be exported over this phase. Assuming a haul truck capacity of 20 cubic yards, there will be approximately 30 haul trips per day used to export this soil.

The building construction phase for Component A would include the construction of the 82,835 ogsf subterranean parking garage and the 83,634 ogsf Student Services Replacement Building. This phase would begin in December of 2009 and last for approximately 18 months (616 work days). The equipment utilized during this phase would include the following: three (3) concrete/industrial saws, one (1) crane, two (2) rough terrain forklifts, one (1) tractor and one (1) skid steer loader. It was assumed that all equipment would run for a maximum of 7 hours per day.

The finishing and paving phase for Component A would include the application of architectural coatings and site paving. This phase would begin in January of 2012 and last for approximately three months (66 work days). The equipment utilized during this phase would include the following: one (1) cement and mortar mixer, one (1) piece of surfacing equipment, and one (1) piece of other construction equipment. It was assumed that all equipment would run for a maximum of 7 hours per day.

In summary, Component A would begin construction in December of 2009 and would end in March of 2012.

Component B Assumptions

Component B would involve construction activities on the north and northwest areas of the principal Project Site area, and would involve demolition on the southern smaller area of the Project Site. Component B would involve the on-site demolition of the Student Services/Admissions Complex and Coffee Kiosk, the ground floor northern wings of Drescher Hall, and the Counseling Complex and the Bursar's Office totaling approximately 46,932 ogsf. It should be noted that this component would also involve the removal of the Counseling Annex. However, since this use is a modular building, it would be hauled off site and would not require any on-site demolition. These demolition activities would begin in April of 2012 and last approximately two months (44 work days). The equipment utilized during this phase would include the following: one (1) rubber tired dozer, one (1) rubber tired loader, and one (1) other piece of construction equipment. It was assumed that all equipment would run for a maximum of 7 hours per day.

The site grading phase for Component B would be minimal. This component would not require any extensive excavation and no soil is expected to be hauled off site. The grading phase would begin in June of 2012 and last approximately one month (22 work days). The equipment utilized during this phase would include the following: one (1) excavator, one (1) rubber tired dozer, and one (1) other piece of construction equipment. It was assumed that all equipment would run for a maximum of 7 hours per day.

The building construction phase for Component B would include the renovation and addition for Drescher Hall ground floor totaling 26,000 ogsf. This phase would begin in July of 2012 and last for approximately 14 months (308 work days). The equipment utilized during this phase would include the following: three (3) concrete/industrial saws, one (1) crane, two (2) rough terrain forklifts, one (1) tractor and one (1) skid steer loader. It was assumed that all equipment would run for a maximum of 7 hours per day.

The finishing and paving phase for Component B would include the application of architectural coatings and site paving. This phase would begin in June of 2013 and last for approximately three months (66 work days). The equipment utilized during this phase would include the

following: one (1) cement and mortar mixer, one (1) piece of surfacing equipment, and one (1) piece of other construction equipment. It was assumed that all equipment would run for a maximum of 7 hours per day.

In summary, Component B would begin construction in April of 2012 and would end in August of 2013.

Construction Emissions

The analysis of daily construction emissions has been prepared utilizing the URBEMIS 2007 computer model recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table IV-1 identifies daily emissions for Components A and B that are estimated to occur on peak construction days along with the thresholds of significance recommended by the SCAQMD. These calculations were made based on the assumptions described above. It was also assumed that appropriate dust control measures would be implemented during each phase of development as required by SCAQMD Rule 403 – Fugitive Dust.

Table IV-1
Estimated Maximum Daily Construction Emissions for Components A & B

Emissions Source		Emissions in Pounds per Day					
		NOx	CO	SOx	PM_{10}	PM _{2.5}	
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00	
Component A							
Demolition from 12/1/08 to 12/31/09	7.61	86.44	38.36	0.07	56.74	14.67	
Demolition from 1/1/09 to 2/28/09	7.21	81.41	35.81	0.07	56.40	14.36	
Mass Grading from 3/2/09 to 11/30/09	7.49	75.15	36.12	0.04	147.84	33.24	
Building Construction from 12/1/09 to 12/31/09	3.05	22.48	23.53	0.02	1.34	1.18	
Building Construction from 1/1/10 to 12/31/10	2.86	21.06	22.33	0.02	1.23	1.09	
Building Construction from 1/3/11 to 12/30/11	2.65	19.58	21.17	0.02	1.17	1.03	
Building Construction from 1/2/12 to 3/30/12	56.54	18.21	20.70	0.02	1.07	0.94	
(including architectural coatings)							
Significant Impact For Any Phase?	No	No	No	No	No	No	
Component B							
Demolition from 4/2/12 to 5/31/12	5.66	64.50	27.67	0.09	72.98	17.19	
Site Prep/Grading from 6/1/12 to 6/30/1	2.72	22.0	12.42	0.00	63.76	14.08	
Building Construction from 7/2/12 to 12/31/12	1.11	8.28	6.35	0.00	0.52	0.47	
Building Construction from 1/1/13 to 6/28/13	1.02	7.65	6.14	0.00	0.46	0.41	
Building Construction from 7/1/13 to 8/30/13	13.40	7.66	6.26	0.00	0.46	0.41	
(including architectural coatings)							
Significant Impact For Any Phase?	No	No	No	No	No	No	
Source: Christopher A. Joseph & Associates, 2007. Calculation sheets are provided in Appendix A.							

As shown in Table IV-2, maximum daily construction emissions for Components A and B would not exceed SCAQMD thresholds of significance. As stated above, the Proposed Project would be required by SCAQMD Rule 403 – Fugitive Dust to implement appropriate dust control measures during each phase of development. With the implementation of these measures provided below, impacts associated with project construction would be less than significant.

Mitigation Measures

- All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403.
- The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- 3. All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- 4. All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- 5. Soil stabilizers shall be applied to inactive construction areas.
- 6. Ground cover in disturbed areas shall be quickly replaced.
- 7. All haul roads shall be watered three times daily.
- 8. All stock piles of debris, dirt, or rusty materials shall be covered with a tarp.
- 9. Vehicle speed on unpaved roads shall be reduced to less than 15 miles per hour (mph).

Operation Emissions

As stated previously, the Proposed Project would result in the development of approximately 62,005 asf of Campus related uses and the demolition and inactivation of approximately 67,124 asf of Campus related uses. Accordingly, the Proposed Project would not be considered a growth inducing project, and would not result in any new vehicle trips to or from the Campus. Therefore, motor vehicle emissions would not be increased under the Proposed Project. Similarly, stationary area source emissions that are typically generated by the consumption of natural gas, the operation of landscape maintenance equipment, and the use of consumer products would be substantially similar to the existing uses that are going to be replaced by the Proposed Project. As the Proposed Project would include the replacement of the same type of

uses and would result in a net decrease of 5,119 asf on the Project Site, it is anticipated that stationary area source emissions would not be increased and would not exceed the SCAQMD thresholds. Accordingly, operational air quality impacts would be considered less than significant.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM_{10}) under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. Cumulative development could possibly result in a significant impact in terms of conflicting with, or obstructing implementation of, the 2007 AQMP. The 2007 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact on the economy. Growth considered to be consistent with the 2007 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the Growth Management Chapter of the RCPG, implementation of the 2007 AQMP will not be obstructed by such growth. Since the Proposed Project and development would not jeopardize attainment of air quality standards in the 2007 AQMP for the Basin and the Los Angeles County portion of the Basin, they would not have a cumulatively considerable contribution to this impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan.

The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess these emissions. 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. As discussed previously, construction-related emissions would not exceed the SCAQMD's recommended thresholds during any of the projected scenarios. Therefore, these emissions would neither be cumulatively considerable nor significant. Also, the operational emissions associated with the Project would not exceed the recommended thresholds and would neither be cumulatively considerable nor significant.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Ambient air quality standards are set at levels to protect the health of the most sensitive members of the population with an adequate margin of safety. Facilities which house persons who are especially sensitive to air pollution are called "sensitive receptors". Sensitive receptors generally include residential land uses, schools, churches, hospitals, and parks. Based on site investigation, there are approximately three types of sensitive land uses in

the immediate vicinity of the Project Site which consist of religious institutions, schools, and residences. Specifically, the following uses have been identified as sensitive uses and are listed in Table IV-2, and displayed on Figure IV-1, below.

Table IV-2 Sensitive Uses

Number ^a	Sensitive Use	Location	Distance to Project Site	
1	SMC Main Campus Uses	SMC Main Campus	0 feet	
2	2-Story Apartments	1731 Pico Boulevard	85 feet	
3	Westside Intl Christian Center	1819 Pico Boulevard	70 feet	
4	3-Story Apartments	1905 Pico Boulevard	70 feet	
5	20 th Street Residences	2100 - 2300 20 th Street	30 – 200 feet	
6	Pearl Street Residences ^b	1825 – 1837 Pearl Street	60 – 260 feet	
7	Pearl Street Residences & SMC Uses ^b	1708 – 1744 Pearl Street	160 – 470 feet	
8	Church of Jesus Christ, Latter Day Saints	1708 Pearl Street	500 feet	
9	John Adams Middle School	2425 16th Street	600 feet	

^a This number corresponds to the number displayed on Figure IV-1, Sensitive Uses Location Map.

As discussed previously, construction-related emissions would not exceed the SCAQMD's recommended thresholds during any of the projected scenarios. Also, the operational emissions associated with the Project would not exceed the recommended thresholds and would be considered less than significant. As the emissions generated by the Proposed Project for construction and operation would not result in substantial pollutant concentrations, it is anticipated that impacts on sensitive receptors in the area would also be less than significant. Furthermore, the College would aim to schedule the most disruptive construction activities during off peak times during the school year so as to minimize potential impacts on and around the Campus. With the implementation of the construction-related mitigation measures identified in Section I(b), above, potential impacts on surrounding sensitive receptors would be considered less than significant.

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

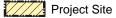
No Impact. A significant impact may occur if a project created objectionable odors which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. The Proposed Project contains none of the above-listed odor producing uses, as the Project involves the development of the Student Services Replacement Building, Bookstore Modernization and Pico Promenade Improvements. The Proposed Project would not create objectionable odors such as chemicals, solvents, and petroleum products that would affect a substantial number of people. No impact would occur.

^b Although these uses may be closer to Building 6 on the Project Site (Counseling Annex), the distance was measured to Building 5 (Counseling Complex) as the removal of the temporary modular buildings will not require on-site demolition or other construction related activities.



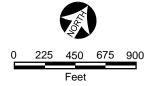
<u>Legend</u>





(#)

Sensitive Uses



Source: Santa Monica College, 2007.



II. AESTHETICS

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

Less Than Significant Impact. A significant impact would occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocked a scenic vista.

Scenic vistas in the Proposed Project area are limited due to the Proposed Project's location on a developed college campus that consists of various school facilities and parking structures. There are no topographic features on the Project Site from which scenic vistas may be viewed, or which make up part of the scenic landscape of the surrounding community. Conversely, there are no unique topographic features in the surrounding area that afford views of the Project Site and beyond. Development of the Proposed Project would be similar in character to the existing and surrounding uses in the Project vicinity, and would not obstruct any scenic vistas. The existing views to and from the Project Site would be altered with the demolition of existing uses, the renovation of Drescher Hall, the construction of the proposed Student Services Building, and the proposed landscape and site work improvements. All landscaping and greenscape would provide on-site shade and visual relief and would be designed in a manner that would be compatible with other structures and landscape features on the SMC Main Campus. Additionally, the Proposed Project would include various Campus-related signage components along the Pico Boulevard frontage that would enhance the Campus presence and function along Pico Boulevard. The Project Site does not lie within a scenic vista or within a view shed of a scenic highway.¹ Therefore, the Proposed Project would not have a substantial adverse effect on a scenic vista.

The proposed Student Services Building would reach a height of approximately 60 feet above grade. This would be an increase in height as compared to the existing structures on the Project Site. Although this would represent an increase in building height, the overall height would not adversely affect the character of the surrounding uses or neighborhood. The height of the proposed building would be comparable to the existing height of the adjacent Drescher Hall, the Business Building, and Parking Structure C, all located on the SMC Campus. The Proposed Project would therefore be consistent with the scale and massing of other nearby adjacent structures. Impacts on scenic vistas would be less than significant.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

¹ California Scenic Highway Mapping System, State of California Department of Transportation. Website http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed April 17, 2007.

Less Than Significant Impact. A significant impact would occur only where scenic resources would be damaged or removed by a project. The Project Site currently includes facilities that house student services operations, classrooms, offices, a large assembly hall for lectures and performances, landscaping, and surface parking uses. There are no significant natural features such as rock outcroppings, bodies of water, or substantial stands of native vegetation on the Project Site. There are no major open spaces and there are no aesthetically significant man-made features such as major architectural structures, monuments, or gardens on the Project Site. Although the Project Site contains a few non-native trees in various planters throughout the site, the removal and replacement of the existing vegetation and trees would not be considered significant. Additionally, there are no scenic resources or historically significant buildings on-site and no state designated scenic highways are located adjacent to or within view of the Project Site.² Accordingly, impacts on scenic resources would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project introduced incompatible visual elements on a Project Site or visual elements that would be incompatible with the character of the area surrounding a Project Site. The Project Site is located on a developed college campus and is in an area characterized by a mix of residential and commercial land uses. The immediate vicinity is characterized by restaurant, commercial, apartment uses and a religious institution on Pico Boulevard to the north, one and two-story single residential uses and apartments along 16th-20th Street to the east, Campus-related uses and residential uses to the south, and Campus-related uses to the west.

Development of the Proposed Project would be similar in character to the existing and surrounding uses in the Project vicinity. In addition, the Project Site would include landscaping that would be designed in a manner that is compatible with other areas on the SMC Campus.

The Proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings. The Proposed Project includes various landscape features, site work elements, and Campus-related signage that would improve the visual character of the Campus as compared to its existing conditions. Therefore, potential impacts to the visual character or quality of the site and its surroundings are anticipated to be less than significant.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project introduces new sources of light or glare on the Project Site which would be incompatible

See Section IV(a) for a discussion of historic resources.

with the areas surrounding the Project Site or which pose a safety hazard, such as to motorists utilizing the adjacent streets.

The Project Site is located on a developed college campus and is in an area characterized by a mix of residential and commercial land uses. The Project Site currently experiences numerous sources of nighttime illumination typical to an urban environment.

The surrounding area is brightly illuminated by the restaurant, commercial, and apartment uses on Pico Boulevard to the north of the Project Site. Additionally, streetlights and lighting from the other surrounding residential, commercial, and school facilities in the project vicinity provide substantial amounts of lighting in the general area. Also, the principal Project Site area on the northern boundary of the Campus currently contains a surface parking lot, on which pole mounted lights and vehicle headlights contribute to the ambient lighting conditions.

The Proposed Project would provide comparable levels of security lighting in comparison to the existing Project Site and the surrounding uses. Nighttime lighting would be limited to low-wattage outdoor security lighting and illuminated signage for informational and directional signs. In addition, all lighting would be shielded and directed onto the Project Site and away from adjacent school facility uses, nearby residences and commercial uses along Pico Boulevard, 20th Street, and Pearl Street. The Proposed Project also includes a 3-level subterranean parking garage that would eliminate a large source of headlight illumination currently generated by the surface parking lot on site. Since the existing Project Site and the surrounding area are brightly illuminated, and because the lighting for the Proposed Project would be comparable to lighting that currently exists on the Project Site, nighttime lighting impacts are expected to be less than significant. Although no significant changes in nighttime lighting levels are anticipated, night sky illumination remains an ongoing visual problem in urbanized areas. Therefore, measures are recommended to reduce the amount of night sky illumination generated by the Proposed Project.

Currently, glare is produced when sunlight is reflected off of the surfaces of buildings, objects or by vehicle headlights in the in the vicinity. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity (i.e., albedo) in a given area. The Proposed Project is not expected to create unusual or isolated glare impacts since it would be constructed with non-reflective materials and it would be consistent with existing structures near the Project Site. It is anticipated that the Proposed Project would not create significant glare impacts. However, mitigation measures are recommended to reduce potential glare impacts to a less-than-significant level.

Mitigation Measures

The following mitigation measures are recommended to reduce potential light and glare impacts to a less-than-significant level:

- 10. To reduce spillover lighting impacts, all Project lighting shall be directed onto the site, and all lighting shall be shielded from adjacent roadways and off-site properties. And, the Project shall use low wattage security lighting.
- 11. Atmospheric lighting pollution shall be minimized by utilizing lighting fixtures that cutoff light directed to the sky.
- 12. All structures shall incorporate non-reflective exterior building materials in their designs. Any glass to be incorporated into the facades of the buildings should either be of low-reflectivity or accompanied by a non-glare coating.

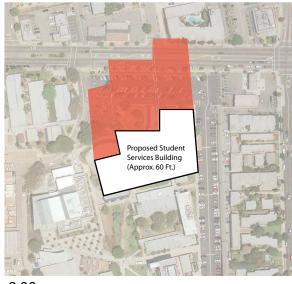
e) Would the project create a new shadow that would adversely affect a shadow-sensitive use?

Less Than Significant Impact. The Proposed Project would involve the construction of a Student Services Building that would be three stories and would reach an approximate height of 60 feet. Surrounding uses that may be considered shadow-sensitive include the residential uses located to the north along Pico Boulevard, the church (Westside International Christian Center) located to the north along Pico Boulevard, and the residential uses located to the east along 18th Street Courtyard. The residential and church uses are located approximately 165 feet north of the proposed building footprint, and the residential uses to the east are located approximately 100 feet from the proposed building footprint.

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

Due to the Proposed Project's location in Southern California, the majority of shadows cast by the Project throughout the day would be to the west, north and east of the Project Site. As shown in Figure IV-2, below, winter project shadows would shade portions of the residential uses to north and east during the 9:00 a.m. and 3:00 p.m. hours, respectively. However, as the 12:00 p.m. hour project shadow would not shade any sensitive uses then it would not be possible to shade any

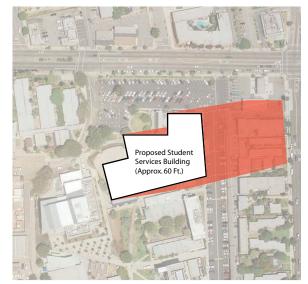
Winter Shadows



9:00 a.m.



12:00 p.m.



3:00 p.m.



9:00 a.m.



1:00 p.m.



5:00 p.m.

Source: Santa Monica College, 2007; Christopher Joseph & Associates.



sensitive use for more than 3 hours between 9:00 a.m. and 3:00 p.m. during the winter season. With respect to summer project shadows, Figure IV-2 indicates that no sensitive uses would be shaded at any time during the summer season. Accordingly, shade and shadow impacts as a result of the Proposed Project would be less than significant.

III. BIOLOGICAL RESOURCES

a) Would the project 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 Game or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if a project were to remove or to modify a habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the state or federal regulatory agencies cited. The existing Project Site consists of surface parking, several buildings and modular units, and other impervious surfaces that do not provide any native vegetative habitat. Additionally, the Project Site is located on a developed college campus that is surrounded by urban development. No candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Game (CDFG) or the U.S. Fish and Wildlife Service (USFWS) were found on the Project Site or are expected to reside on the Project Site. Furthermore, the Project Site contains no habitat for such species. No impact would occur.

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

No Impact. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The existing Project Site consists of surface parking, several buildings and modular units, and other impervious surfaces. Additionally, the Project Site is located on a developed college campus that is surrounded by urban development. No wildlife corridors are located on-site or in the Project area due to the high level of existing urban development. The Proposed Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. No impact would occur.

c) Would the project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

No Impact. A project-related significant adverse effect could occur if a project would cause an impact which is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Santa Monica Tree Code.

Although the Project Site contains a few non-native trees in various areas throughout the site, the removal or disturbance of the non-native trees would not be significant and would be done in a manner that is consistent with the code. Additionally, although the Proposed Project would involve the removal of non-native trees and other vegetation, the Proposed Project will include new landscape features that would replace the removed or disturbed species. Accordingly, the Proposed Project would not affect any local policies or ordinances protecting or preserving biological resources. No impact would occur.

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

No Impact. A significant impact would occur if a project were inconsistent with the resource policies of any conservation plans of the types cited above. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

IV. CULTURAL RESOURCES

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

No Impact. This section provides a summary of the Historic Resource Report prepared for the Proposed Project. The historic report can be found in its entirety as Appendix C to this Initial Study.

The buildings identified on the Project Site are not presently designated under any of the landmark programs at the national, state, or local levels. Nor have they been previously identified in any historic resource surveys in the City of Santa Monica. Based upon the research and analysis conducted for the historic resource report, no buildings on the Project Site appear to be eligible for listing in the National or California Register due to of architectural distinction and physical integrity. Likewise, they are not candidates for designation under the local landmark ordinance. These evaluations are consistent with the California Register Status Code of 6Z. Therefore, the Project Site does not contain historic resources subject to CEQA, and the Proposed Project would have no impact on historic resources.

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

Potentially Significant Unless Mitigation Incorporated. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for

historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources which fall under either of these categories.

The Project Site is located in an urbanized area which has been previously disturbed by past activities. There are no known archaeological resources on the Project Site or off-site demolition locations. The Project Site is not located in an area designated by the City of Santa Monica as being in an archaeological site or survey area. Any archaeological resources which may have existed at one time have likely been previously unearthed or disturbed. While no further evaluation of this issue is recommended, periodic monitoring during construction is recommended to identify any potential archaeological resources uncovered during Project construction activity. While this impact would be considered less than significant, the mitigation measures listed below are included to ensure potential impacts would remain less than significant.

Mitigation Measures

The following mitigation measures are recommended to ensure potential impacts would remain less than significant:

- 13. If any archaeological or paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery. The services of a professional archaeologist or paleontologist shall be secured by contacting the Center for Public Archaeology Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist and/or the Center for Public Paleontology USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Museum to assess the resources and evaluate the impact. Based on the significance of any discovery, the consulting archaeologist or paleontologist shall provide recommendations to mitigate any potential impacts.
- 14. Copies of the archaeological or paleontological surveys, studies or reports shall be submitted to the UCLA Archaeological Information Center.
- c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Unless Mitigation Incorporated. A project-related significant adverse effect could occur if grading or excavation activities associated with the Proposed Project would disturb paleontological resources or geologic features which presently exist within the Project Site. There are no known paleontological resources on the Project Site. No vertebrate fossil sites have been identified in the vicinity of the Project Site, and therefore, top soil and previously disturbed surficial layers in the Proposed Project area are not likely to contain substantive vertebrate fossils. Although there is a possibility that paleontological resources do exist at deep

levels, the uncovering of such resources would be remote. Nevertheless, incorporation of the recommended mitigation measures identified would reduce the potential for impacts related to paleontological resources to a level of insignificance.

Mitigation Measures

See mitigation measures under Section IV(B), above.

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

Potentially Significant Unless Mitigation Incorporated. A project-related significant adverse effect would occur if grading or excavation activities associated with the Proposed Project were to disturb previously interred human remains. The existing Project Site consists of surface parking, several buildings and modular units, and other impervious surfaces. While there is no evidence that human remains are located on the Project Site, there is still a remote possibility that the construction phase of the Proposed Project could encounter human remains, which could result in potentially significant cultural resource impacts. While this impact is anticipated to be less than significant, the mitigation measure below is included to ensure potential impacts would remain less than significant.

Mitigation Measures

The following mitigation measure is recommended to ensure potential impacts would remain less than significant:

15. In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code and Public Resources Code. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains.

V. GEOLOGY AND SOILS

- a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or

based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a Project Site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed. The Project Site is located near several active, and potentially active faults. An active fault is defined by the State of California as a "sufficiently active and well defined fault" that has exhibited surface displacement within Holocene time.³ A potentially active fault is defined by the state as a fault with a history of movement within the Pleistocene time.

The nearest known active fault is the Inglewood Branch of the Newport-Inglewood Fault zone, located approximately one-half mile northeast of the SMC Main Campus. The trace of the Newport-Inglewood Fault trends north-south through the City of Santa Monica. The Santa Monica-Hollywood Fault is the nearest potentially active fault, located approximately two-thirds of a mile north of the SMC Main Campus. In addition, the potentially active Charnock and Overland Faults are located two and three miles east, respectively.⁴

The Project Site is not located within a state-designated Alquist-Priolo Special Study Zone.⁵ The Project Site is also not located within a State of California or Los Angeles County designated Earthquake Fault Rupture Zone for active surfacing.⁶ Furthermore, no fault traces pass directly beneath the College. Nevertheless, the Project Site is located within the seismically active southern California region and can be expected to experience the effects of strong ground motion from earthquakes during the design life of the Project. As such, impacts associated with the exposure of people or structures to potentially adverse effects, including the risk of loss, injury, or death involving the rupture of an earthquake fault would be reduced to a less-than-significant level with implementation of the recommended mitigation measure.

Mitigation Measures

16. The Project shall comply with all applicable building and safety guidelines, restrictions, and permit regulations, including the Uniform Building Code for Seismic Zone 4 and the California Department of Conservation, Division of Mines and Geology Requirements.

Earthquake Fault Zoning, Website: http://www.consrv.ca.gov/CGS/rghm/ap/chp_7_5.htm, accessed April 18, 2007.

City of Santa Monica, <u>Master Environmental Assessment</u>, September 2000, Exhibit 4-4, Geologic Hazards; and, Geolabs – Westlake Village, Preliminary Geotechnical Investigation of Proposed Subterranean Parking Garage and Student Services Building Project, October 22, 2007.

⁵ City of Santa Monica, <u>Master Environmental Assessment</u>, September 2000, Exhibit 4-4, Geologic Hazards.

Fault Rupture Hazard Zones In California, Website: http://www.consrv.ca.gov/CGS/rghm/ap/chp 7 5.htm, accessed November 15, 2007.

(ii) Strong seismic ground shaking?

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project represents an increased risk to public safety or the destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region. While the understanding of seismic activity grows over time, and additional faults are discovered, the Project Site currently is not included in a state-designated Alquist-Priolo Special Study Zone or a state-designated Earthquake Fault Rupture Zone (see Section V(a)(i) above). Nevertheless, the Project Site is susceptible to strong ground shaking during a seismic event. As discussed in Section V(a)(i), the Proposed Project would be required to comply with the applicable State building and safety guidelines, restrictions, and permit regulations, including the Uniform Building Code and the California Department of Conservation, Divisions of Mines and Geology requirements (see Section V(a)(i), Mitigation Measure 1). Implementation of the recommended mitigation measure is expected to reduce impacts associated with strong seismic ground shaking to a less than significant level.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project is located in an area that is identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. Liquefaction occurs when loose, coarse grained or silty soils are subject to strong shaking resulting from earthquake motions, and where the depth of groundwater is 50 feet or less. The coarse-grained or silty soils typically lose a portion or all of their shear strength, and regain strength sometime after the shaking stops. Soil movements (both vertical and lateral) have been observed under these conditions due to consolidation of the liquefied soils.

The soils underlying the SMC Main Campus consist primarily of Pleistocene-age shallow marine deposits composed of weakly consolidated sand, pebbly sand gravel and silt, and some alluvial sediments.⁷ The artificial soils appear to be derived from the on site soils and are comprised of medium brown, orangish brown, and dark brown silty sand and gravel. The marine terrace deposits consist of orangish brown, light brown, and tan interbedded very fine to medium grained sand with sporadic but typically minor silt and gravel content.⁸

The depth of the groundwater is estimated to be at approximately 110 feet below the ground level in vicinity of the Santa Monica College, and groundwater was not encountered on the Project Site

⁷ City of Santa Monica, <u>Safety Element of the General Plan: Technical Background Report; Figure 1,2 Surficial Geology and Depth to the Ground Water, November 1996.</u>

⁸ Geolabs – Westlake Village, Preliminary Geotechnical Investigation of Proposed Subterranean Parking Garage and Student Services Building Project, October 22, 2007.

up to a depth of 100 feet.⁹ Furthermore, the Project Site which is located in the City of Santa Monica is in an area considered to have very low to no susceptibility to liquefaction or subsidence of the land.¹⁰ Therefore, geotechnical impacts associated with seismic-related ground failure, including liquefaction, would be less than significant.

(iv) Landslides?

No Impact. A project-related significant adverse effect may occur if a project is located in a hillside area with soil conditions that have a high potential for sliding. The Project Site is not located in a hillside area, nor is it proximate to hillsides. The Project Site has been previously graded, developed and paved. Furthermore, the Project Site is not listed within a Seismic Hazard Zone for Earthquake-Induced Landslides by the State. Therefore, seismically induced land sliding would not be expected at the Project Site. No impacts would occur.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. During construction, grading would expose soils for a limited time, allowing for possible erosion, although the amounts would not be expected to be substantial. The Proposed Project includes the construction of a 3 level subterranean parking garage. As such, grading and site preparation required for the Proposed Project would include approximately 35 feet of excavation of the Project Site.

Although project development has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by the implementation of stringent erosion control measures that would be imposed during grading through building permit regulations. Minor amounts of erosion and siltation could occur during grading activities. However, the potential for soil erosion during the ongoing operation of the Proposed Project is relatively low due to the generally level topography of the development area and the build out of the entire Project Site. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit any potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of the Santa Monica Municipal Code which addresses grading, excavations, and fills. With implementation of the applicable grading and building permit

[&]quot; Ibid.

City of Santa Monica, <u>Safety Element of the General Plan: Technical Background Report; Plate 1, Fault Hazard Management Zones and Liquefaction Susceptibility, January 1995.</u>

Fault Rupture Hazard Zones In California Website: http://www.consrv.ca.gov/CGS/rghm/ap/chp 7 5.htm, accessed November 15, 2007.

requirements and the application of Best Management Practices, potential impacts related to erosion or the loss of topsoil would be less than significant.

Mitigation Measures

The following mitigation measures are recommended to ensure the application of Best Management Practices and the compliance with all code and ordinance requirements to minimize the potential impacts associated with short-term grading impacts during the construction of the Proposed Project.

- 17. Appropriate erosion control and drainage devices shall be incorporated to minimize erosion to the maximum extent feasible.
- 18. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.
- c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with regard to liquefaction and landslide potential are evaluated in Sections V(a)(iii) and (iv) above. Construction of the Proposed Project would comply with the requirements of the Division of the State Architect, which would assure safe construction, including building foundation requirements appropriate to site conditions. Conformance with the Division of the State Architect would reduce impacts to a less than significant level.

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. The soils underlying the SMC Main Campus consist primarily of Pleistocene-age shallow marine deposits composed of weakly consolidated sand, pebbly sand gravel and silt, and some alluvial sediments. The Project Site is not known to be located in an area with expansive soils. Proper construction would be further assured through the compliance with the Division of the State Architect, which includes building foundation requirements appropriate to site conditions. Impacts would be considered less than significant.

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

No Impact. A significant impact may occur if a project were located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Santa Monica, which is served by a wastewater collection, conveyance and treatment system operated by the City of Santa Monica. No septic tanks or alternative disposal systems are necessary, nor are they proposed. No impact would occur.

VI. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Uses sensitive to hazardous emissions (i.e., sensitive receptors) in the area include the following: SMC Main Campus Uses, Westside International Christian Center, Church of Jesus Christ of Latter Day Saints, John Adams Middle School, and all residential uses bordering the SMC Main Campus (see Figure IV-1 above).

The use of hazardous materials (e.g., fuel, cleaning solvents, paint, etc.) during construction of the new facilities and during the demolition of the existing facilities would be minimal and would be in compliance with all applicable City, state, and federal regulations. The use of hazardous materials during the operation of the Proposed Project would include minimal amounts of fuel, and cleaning solvents that would be used for janitorial purposes and landscaping. No hazardous materials would be transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project.

Santa Monica College maintains a comprehensive inventory of all hazardous materials stored and used in each building. In the event of a chemical release on the Campus, the Santa Monica Fire Department's Hazardous Materials Response Unit would respond and remediate the incident. Existing Campus safety programs include an Illness and Prevention Program, a Hazardous Materials Business Plan, and a Chemical Hygiene Program. Santa Monica College has prepared an Emergency Preparedness Manual in order to plan for Campus emergencies, including chemical spills and fire incidents. The Emergency Procedures Bulletin, a condensed version of the Emergency Preparedness Manual, is posted at several locations throughout the Campus. 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. Impacts would be considered less than significant.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project utilizes substantial quantities of hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions. The Proposed Project includes on-site demolition of the following uses: the Student Services/Admissions Complex and Coffee Kiosk, the ground floor northern wings of Drescher Hall, the Music Complex, the Concert Hall, the Amphitheater and Event Box Offices/International Education Center, and the Counseling Complex and Bursar's Office. Due to the age of the structures, asbestos-containing materials (ACMs) may be located within these and other existing structures on the Campus. Exposure to ACMs during demolition could be hazardous to the health of the construction workers as well as the students, employees, and area residents. However, the recommended mitigation measure identified below regarding impacts related to the release of hazardous materials into the environment would ensure that potential impacts would be less than significant.

Mitigation Measure

- 19. Prior to the issuance of a demolition permit, the applicant shall provide a letter to the SMC Office of Facilities Planning from a qualified asbestos abatement consultant stating that no ACMs are present in the structures. If ACMs are found to be present, such materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other state and federal rules and regulations.
- c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. A project-related significant adverse effect may occur if a Project Site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

The development of the Proposed Project occurs on the SMC Main Campus. However, as stated in VI(b), above, the Proposed Project would use, at most, minimal amounts of hazardous materials for routine cleaning and landscaping, and therefore would not emit hazardous emissions within the SMC Main Campus or any other nearby school. Impacts would be considered less than significant.

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

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

The Project Site is not included on a list of hazardous material sites compiled by the Government.¹² Furthermore, as stated in VI(b), above, the Proposed Project would use, at most, minimal amounts of hazardous materials for routine cleaning and landscaping, and therefore would not pose an environmental hazard to surrounding sensitive uses. Impacts would be considered less than significant.

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

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area, or within two miles of a public airport, and would subject area residents and workers to a safety hazard. The closest airport to the Project Site is the Santa Monica Municipal Airport, which is located approximately 2.7 miles to the southeast. No impact would occur.

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

No Impact. A significant impact to a project would occur only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Proposed Project is not located in the vicinity of a private airstrip. No impact would occur.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate sufficient traffic congestion that would interfere with the execution of such a plan. Construction of the Proposed Project would not substantially impede public access or travel upon public rights-of-way and would not

Environmental Protection Agency, http://www.epa.gov/region09/waste/sfund/superfundsites.html, accessed November 15, 2007.

interfere with any adopted emergency response plan or emergency evacuation plan. A temporary access plan for the construction phase would be implemented, and access to the Project Site would be in accordance with the California Building Code, which includes fire and safety hazards. Although the development of the Proposed Project is not expected to interfere with any adopted emergency response plan or emergency evacuation plan, a mitigation measure is included to ensure that impacts would remain less than significant.

Mitigation Measure

The following mitigation measure is recommended to ensure the compliance with all code and ordinance requirements thereby minimizing any potential impacts associated with traffic congestion that would interfere with an emergency response plan or emergency evacuation plan which may result from the construction of the Proposed Project.

- 20. Development of the Proposed Project would require Access Compliance (AC) review and Fire and Life Safety (FLS) review by the Division of the State Architect prior to approval of the final Project plans and specifications.
- h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Proposed Project Site is located in an urbanized portion of the City of Santa Monica that does not include wildlands or high fire hazard terrain or vegetation. Although some ornamental landscaping exists on the SMC Main Campus, this landscaping is irrigated regularly and is not considered a fire hazard. No impact would occur.

VII. HYDROLOGY AND WATER QUALITY

a) Would the proposal result in the violation of any water quality standards or waste discharge requirements?

Less Than Significant Impact. A significant impact may occur if a Proposed Project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the National Pollution Discharge Elimination System (NPDES) program, the State Water Resources Control Board (SWRCB), and the Los Angeles Regional Water Quality Control Board (LARWQCB). These regulations include compliance with the Standard

Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

During construction, soil would be exposed to natural processes such as precipitation (depending on the time of year) and runoff. Storm water discharges generated during construction activities could cause an array of physical, chemical, and biological water quality impacts. Specifically, the physical, chemical, and biological integrity of surface runoff water could become compromised. The interconnected process of erosion, sediment transport, and delivery is the primary pathway for introducing key pollutants, such as nutrients (particularly phosphorus), metals, and organic compounds into aquatic systems.

Compliance with SUSMP and City standards would ensure that best management practices (BMPs) would be implemented during the construction phase of the Proposed Project to effectively minimize pollutants in the public water system.

The Proposed Project is located on an institutional facility and runoff from the operation of the Proposed Project is expected to be comparable to the discharge from the existing uses on the Campus and surrounding uses. The Proposed Project would not include industrial discharge to any public water system and would, therefore, not violate any water quality standards or waste discharge requirements. With appropriate project design and compliance with the applicable federal, state and local regulations, code requirements and permit provisions, impacts related to the potential discharge into surface water or changes in water quality are anticipated to be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project included excavations which had the potential to interfere with groundwater movement or included the withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. Surface water runoff from the Santa Monica College Campus goes to two main storm drain lines, the Pico Boulevard drain and the Kenter Canyon Drain, which have a common outfall where Pico Boulevard meets the Santa Monica Beach. The Proposed Project would include the construction of a 3 level subterranean parking garage which would require excavation to an approximate depth of 35 feet. However, there are no groundwater wells on-site and the depth of groundwater is estimated to be at approximately 110 feet below the ground level. Furthermore, the Proposed Project would not involve the withdrawal of the existing groundwater that would substantially deplete groundwater supplies, and no alteration in the amount of groundwater available for public

water supplies would be expected. Therefore, the Proposed Project would not deplete groundwater supplies. Impacts would be considered less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that results in a substantial increase in erosion or siltation during construction or operation of a project. The Project Site is located in a highly urbanized area and there are no streams, rivers, lakes, or major drainage channels in the immediate vicinity of the Project Site.¹³

Currently, stormwater runoff from the existing Project Site is discharged into two main storm drain lines, the Pico Boulevard drain and the Kenter Canyon Drain, which have a common outfall where Pico Boulevard meets the Santa Monica Beach. The Project Site currently contains several buildings, surface parking areas, and contains a large amount of impervious surfaces. The Proposed Project would involve demolition of the buildings and the surface parking lot, and would include an extensive landscape plan that would improve storm water retention capabilities for the Project Site. As the Proposed Project would result in a decrease of impervious surfaces as compared to existing conditions, the Proposed Project would not result in a net increase of stormwater runoff entering the existing storm drain infrastructure.

No deficiencies in affected infrastructure are known to exist now, nor are any anticipated with implementation of the Proposed Project. As stated above, there are no natural watercourses on the Project Site and the site does not drain toward a natural watercourse. Thus, development of the Proposed Project would not alter the course of a stream or river, nor would it cause substantial erosion or siltation on-or off-site. Impacts would be considered less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of a project that would result in flooding conditions affecting a Project Site or nearby properties. As discussed in Section VII(c), above, the Proposed Project would involve demolition of the buildings and the surface parking lot, and would include an extensive landscape plan that would improve storm water retention capabilities for the Project Site. The Proposed Project would not result in an increase of stormwater runoff entering the existing storm drain infrastructure as compared to existing conditions. The Proposed

Beverly Hills Quadrangle, United States Geologic Survey Map, Photo revised 1981.

Project would not alter the course of a stream or river, nor would it increase the potential for flooding, on-site or off-site. Therefore, impacts would be considered less than significant.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if the volume of storm water runoff were to increase to a level which exceeds the capacity of the storm drain system serving a Project Site. As discussed in Section VII(c) and (d), above, the Proposed Project would not result in an increase of stormwater runoff entering the existing storm drain infrastructure as compared to existing conditions.

Currently stormwater runoff from the existing Project Site is discharged into two main storm drain lines, the Pico Boulevard drain and the Kenter Canyon Drain, which have a common outfall where Pico Boulevard meets the Santa Monica Beach. All contaminants gathered during routine cleaning would be disposed of in compliance with applicable stormwater pollution prevention permits. Therefore, the Proposed Project would not provide substantial additional sources of polluted runoff to the storm drain system or increase storm water runoff from the Project Site above existing levels.

Construction-Related Project Impacts

During construction, soil would be exposed to natural processes such as precipitation (depending on the time of year) and runoff. Storm water discharges generated during construction activities could cause an array of physical, chemical, and biological water quality impacts. Specifically, the physical, chemical, and biological integrity of surface runoff water could become compromised. The interconnected process of erosion, sediment transport, and delivery is the primary pathway for introducing key pollutants, such as nutrients (particularly phosphorus), metals, and organic compounds into aquatic systems.

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

Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment which have the potential to leak fuel, oil, antifreeze or other fluids onto the construction-site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. Compliance with SUSMP and City standards would ensure that BMPs would be implemented during the construction phase to effectively minimize excessive soil erosion and sedimentation and eliminate non-storm water discharge off-site. As required by law, BMPs would be included as project mitigation measures to ensure that potentially significant impacts would be reduced to less than significant levels. Therefore, impacts on water quality resulting from erosion and siltation during the construction of the Proposed Project would be less than significant.

Mitigation Measures

- 21. During construction, the Project applicant shall implement all applicable BMPs in accordance with the SUSMP and City of Santa Monica Stormwater Management Program. These BMPs shall include, but not be limited, to the following:
 - Incorporate a BMP or a combination of BMPs best suited to maximize the reduction of pollutant loadings in runoff to the maximum extent practicable;
 - All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as: "NO DUMPING-DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping;
 - Legibility of stencils and signs must be maintained;
 - Trash container areas must have drainage from adjoining roofs and pavement diverted around the areas;
 - Trash container areas must be screened or walled to prevent off-site transport of trash;
 - As part of project review, if a project applicant has included or is required to include Structural or Treatment Control BMPs in project plans, SMC shall require that the project contractor provide verification of maintenance provisions through such means as may be appropriate, including but not limited to, legal agreements, covenants, and/or CEQA mitigation requirements.

Operation-Related Project Impacts

Activities associated with operation of the Proposed Project are not expected to generate substances that can degrade the quality of water runoff. However, potential impacts may result from vehicles and other users at the Project Site during operations of the Proposed Project. All potential impacts to water quality would be reduced by incorporating stormwater pollution control measures and wastewater discharge BMPs as required by the SUSMP approved by the Los Angeles Regional Water Quality Control Board. With the implementation of the mitigation measures provided below, impacts would be considered less than significant.

- 22. SMC shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the County of Los Angeles Standard Urban Stormwater Mitigation Plan. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required.
- 23. Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion.
- 24. Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.
- 25. Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- 26. Storage areas shall be paved and sufficiently impervious to contain leaks and spills.
- 27. Storage areas shall have a roof or awning to minimize collection of stormwater within the secondary containment area.
- 28. Runoff shall be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator; (2) a filtration or (3) infiltration. Dynamic flow separator uses hydrodynamic force to remove debris, and oil and grease, and is located underground. Filtration involves catch basins with filter inserts. Infiltration methods are

typically constructed on-site and are determined by various factors such as soil types and groundwater table. If utilized, filter inserts shall be inspected every six months and after major storms, cleaned at least twice a year.

29. Any connection to the sanitary sewer shall require authorization from the City of Santa Monica.

f) Would the proposal otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. As described in Section VII(a) through (e) above, there exists the potential for construction and operational activities at the Project Site to result in storm water runoff impacts. However, compliance with NPDES requirements and other environmental conditions, as determined necessary by the City of Santa Monica, would ensure that the Project's water quality impacts would be less than significant.

g) Would the proposal be placed within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Proposed Project were located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not located in an area designated as a 100-year flood hazard area. The Proposed Project is located in a highly urbanized area and would not have the potential to impede or redirect floodwater flows. No impact would occur.

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

No Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The Project Site is not in a 100-year flood hazard area and there are no levees or dams in the immediate area. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. No impact would occur.

Flood Insurance Rate Map (Firm), FEMA, Website http://www.esri.com/hazards/index.html November 15, 2007.

Flood Insurance Rate Map (Firm), FEMA Website http://www.esri.com/hazards/index.html, November 15, 2007.

i) Would the proposal result in inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Proposed Project Site is approximately 1.3 miles from the Pacific Ocean at an elevation of 375 feet above mean sea level. The Project Site is not subject to seiche (oscillation of a water body, sometimes prolonged, due to seismic disturbances), tsunami, or mudflow hazards. 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. No impact would occur.

VIII. NOISE

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

Potentially Significant Unless Mitigation Incorporated. Construction-related impacts would be significant if a project results in exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Noise Evaluation Criteria

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

- L_{eq} is the equivalent energy noise level, or the average acoustic energy content of noise
 for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady
 noise are the same if they deliver the same acoustic energy to the ear during exposure.
 For evaluating community impacts, this rating scale does not vary, regardless of whether
 the noise occurs during the day or the night.
- L_{dn} is the day-night average noise level, or a 24-hour average L_{eq} with a 10 decibels (dBA) "penalty" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for the greater nocturnal noise sensitivity of people.

¹⁶ City of Santa Monica, <u>Master Environmental Assessment</u>, September 2000.

CNEL is the Community Noise Equivalent Level, or a 24-hour average L_{eq} with a 10 dBA "penalty" added to noise during the hours of 7:00 p.m. to 10:00 p.m. to account for noise sensitivity in the evening and nighttime.

Existing Sources of Noise

The City of Santa Monica Master Environmental Assessment reports that the most common sources of noise in Santa Monica are transportation-related. Traffic, Campus activities, and residential activities make up the bulk of the existing noise environment in the Project vicinity. Pico Boulevard, north of the Project Site, is a major roadway generating over 65 dBA CNEL along its right-of-way. Approximately 1,500 feet to the north of Pico Boulevard is the Interstate 10 Freeway that bisects the City of Santa Monica. The closest airport to the Project Site is the Santa Monica Municipal Airport, which is located approximately 2.7 miles to the southeast. Airport-related activities do not substantially affect the background noise of the Project area.

Areas adjacent to the Project Site are exposed to relatively quiet on-Campus noise sources such as traffic entering parking areas throughout the Campus, building ventilation equipment and students talking. These sources generally provide a CNEL below 60 dBA. During sporting events held on Campus at Corsair Field, noise levels would typically be higher for the adjacent uses near the southwest corner of the SMC Main Campus.

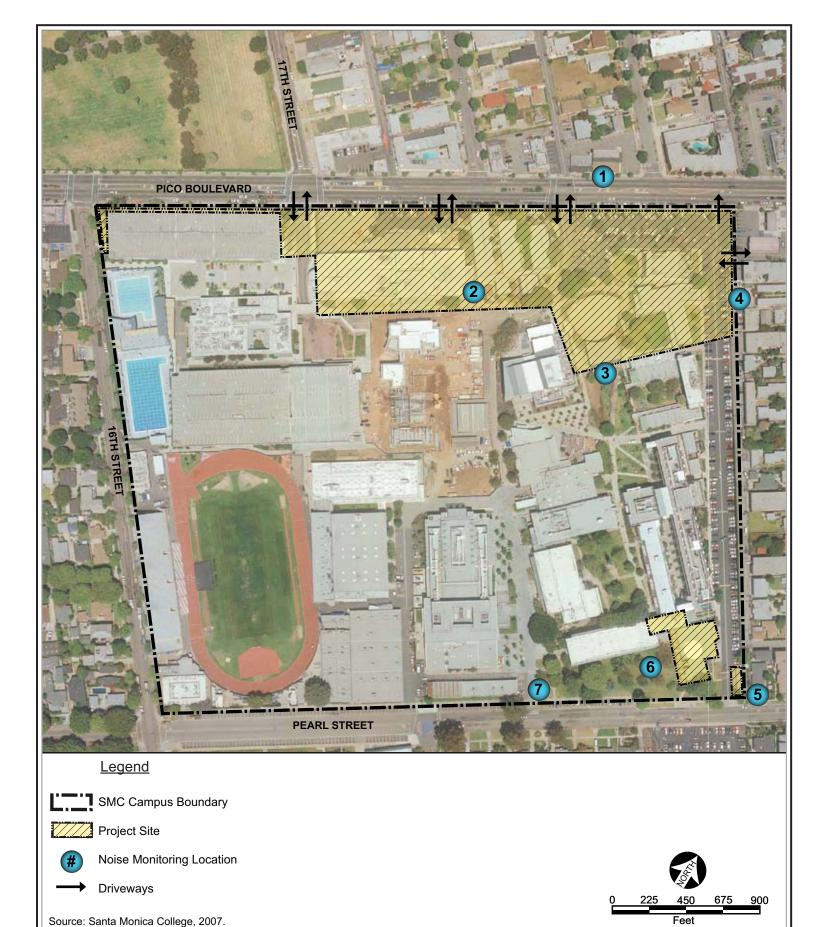
Existing Noise Levels

To establish baseline noise conditions within the vicinity of the Project Site, existing daytime noise levels were documented by taking noise measurements at seven locations in the project area. The noise survey was conducted using the Larson-Davis 824 precision noise meter, which meets and exceeds the minimum industry standard performance requirements for "Type 1" standard instruments as defined in the American National Standard Institute (ANSI) S1.4.

Existing daytime noise levels were measured on April 4, 2007. These locations were selected because they represent the ambient daytime noise levels on the Campus and within the neighborhood surrounding the Project Site, and provide a baseline to establish what the conditions are prior to the construction of the Proposed Project. These noise monitoring locations are also presented on Figure IV-3, below. The 15-minute average noise levels measured at each of these locations are identified in Table IV-3, these noise levels are characteristic of an urban environment.

Sensitive Receptors

Certain types of land uses are considered to be more sensitive to noise than others. Examples of sensitive receptors include: residential land uses, schools, religious facilities, hospitals, and parks. Sensitive receptors surrounding the Project Site include residences, schools, and religious





facilities. The construction noise analysis below identifies several sensitive receptors and their potential exposure to noise levels during construction of the Proposed Project. The City of Santa Monica Master Environmental Assessment considers residential land uses to be "compatible with mitigation" when the surrounding noise environments result in noise levels between 60 and 65 dBA CNEL.

Table IV-3 **Existing Daytime Noise Levels**

Location	Primary Noise Source	Noi	ise Level Stati	stics
Location	Trimary Noise Source	L_{eq}	\mathbf{L}_{min}	\mathbf{L}_{max}
1	Traffic on Pico Boulevard	73.3	52.9	88.5
2	Student Activity	59.2	51.5	76.6
3	Student Activity	53.7	50.3	71.4
4	Surface Parking and Student Activity	58.0	48.6	80.4
5	Traffic on Pearl Street	59.7	47.4	76.5
6	Traffic on Pearl Street and Student Activity	51.2	45.9	59.5
7	Traffic on Pearl Street and Student Activity	56.9	49.1	67.5
Source: Christ	opher A. Joseph & Associates, 2007. Noise level me	easurement da	ta is provided in	Appendix E.

Construction Noise (Temporary)

Construction noise estimates were based on the EPA's Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances. Anticipated noise levels were then evaluated against Sections 4.12.110 and 4.12.060 of the City of Santa Monica Municipal Code.

The City Code states that construction activity shall not cause a maximum instantaneous Aweighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of the Municipal Code for the noise zone where the measurement is taken plus forty dBA, for any period of time. Table IV-4 illustrates the decibel limits specified in Section 4.12.060 of the Municipal Code.

The noise regulation also limits construction noise to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. on Saturday, and does not allow construction noise on Sundays or national holidays. The Proposed Project would be considered as Noise Zone II, and the associated allowable exterior noise equivalent level would be 65 dBA.

Table IV-4
Allowable Exterior Noise Levels

Noise Zone	Time Interval	Allowable Exterior Noise Equivalent Level
I-Residential	Monday through Friday: 12 a.m. to 7 a.m. and from 10 p.m. to 12 a.m.	50 dBA
	7 a.m. to 10 p.m.	60 dBA
	Saturday and Sunday: 12 a.m. to 8 a.m. and from 10 p.m. to 12 a.m.	50 dBA
	8 a.m. to 10 p.m.	60 dBA
II-Commercial	All Days of the Week 12 a.m. to 7 a.m. and from 10 p.m. to 12 a.m.	60 dBA
	7 a.m. to 10 p.m.	65 dBA
III-Industrial	Anytime	70 dBA
Source: City of Santa Monica	Municipal Code.	

Construction noise impacts vary markedly because the strength of construction equipment ranges widely as a function of the equipment used, which changes during the course of the construction period. Construction noise tends to occur in discrete phases dominated initially by earth-moving sources and later for finish construction. Heavy equipment noise can exceed 90 dBA and averages about 85 dBA at 50 feet from the source when the equipment is operating at typical loads. Most heavy equipment operates with varying load cycles over any extended period of time. Table IV-5, below, includes calculations which estimate potential noise levels that could be experienced by sensitive uses near the Proposed Project. Construction noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and receptor, and presence or absence of barriers between the noise source and receptor. For the purposes of this analysis, it is assumed that peak construction equipment would generate noise levels of approximately 90 dBA at a distance of 50 feet.

Based on the calculations provided above, maximum construction-related noise levels would not result in increases above 40 dBA for Noise Zone II as stated under the City of Santa Monica Municipal Code. Additionally, it should be noted that these noise levels would be temporary in nature and would cease after the project is constructed. Furthermore, the Proposed Project would include a noise barrier around the perimeter of the Project Site during major construction activities which would also help to reduce noise levels at surrounding uses. As such, it is anticipated that construction-related noise impacts would be less than significant. However,

mitigation measures are provided below to ensure that potential construction-related noise impacts would remain less than significant.

Table IV-5
Approximate Noise Levels at Sensitive Uses During Construction

Number ^a	Sensitive Use	Distance to Project Site	Noise Levels ^b
1	SMC Main Campus Uses	0 feet	90 dBA
2	2-Story Apartments	85 feet	85.4 dBA
3	Westside Intl Christian Center	70 feet	87.1 dBA
4	3-Story Apartments	70 feet	87.1 dBA
5	20 th Street Residences	30 - 200 feet	77.9 - 90 dBA
6	Pearl Street Residences	60 – 260 feet	75.7 - 88.4 dBA
7	Pearl Street Residences & SMC Uses	160 – 470 feet	70.5 - 79.9 dBA
8	Church of Jesus Christ, Latter Day Saints	500 feet	70.0 dBA
9	John Adams Middle School	600 feet	68.4 dBA

^a This number corresponds to the number displayed on Figure IV-1, Sensitive Uses Location Map.

Mitigation Measures

- 30. Pursuant to Section 4.12.110 of the Municipal Code, no demolition of buildings, excavation/grading or construction activity is permitted before 8 a.m. or after 6 p.m. on Monday through Friday, before 9 a.m. or after 5 p.m. on Saturday, all day on Sunday, and on all national holidays.
- 31. Prior to construction, the contractor shall submit a list of equipment and activities required during construction to the SMC Office of Facilities Planning.
- 32. If it is determined that construction noise would exceed 90 dBA at a distance of 50 feet or greater, the use of the equipment which produces such noise would be limited to between the hours of 10 a.m. to 3 p.m.
- 33. All construction equipment shall be in proper operating condition and fitted with standard factory noise attenuation features.
- 34. Sound blankets shall be used on all construction equipment where technically feasible.
- 35. A construction relations officer shall be appointed by the College to act as a liaison with neighbors and residents concerning on-site construction activity.

^b These noise levels were calculated based on the following: Leq = Leq at 50 ft. – 20 Log(D/50), where L_{eq} = noise level of noise source, D = distance from the noise source to the receiver, Leq at 50 ft. = noise level of source at 50 feet. Harris Miller Miller & Hanson Inc.'s (HMMH) Transit Noise and Vibration Impact Assessment, Final Report.

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

Operational Noise

The Proposed Project would not increase student population and would not generate additional traffic volumes on the surrounding street system. As such, operational noise impacts associated with traffic volumes would remain unchanged. Additionally, post-construction noise levels would not exceed the exterior standards of 65 dBA for residential and school uses established by the Noise Element of the City of Santa Monica and the California Department of Health, and Project operations would not result in a perceptible change in the noise environment as compared to the existing conditions. Therefore, the operational impacts of the Proposed Project would be considered less than significant. The mitigation measure below is included to ensure that the development of the Proposed Project would result in less-than-significant operational noise impacts.

Mitigation Measures

- 37. Noise-generating mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot. Roof locations may be used when the mechanical equipment is installed within a sound rated, parapet enclosure.
- b) Would the project result in exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. A significant impact may occur if the Proposed Project were to generate excessive vibration during construction or operation. Construction of the Proposed Project would require the use of heavy machinery and equipment during the grading, excavation, and construction phases that could produce groundborne vibration or noise levels. This would be especially true during the excavation of the subterranean levels. However, the mitigation measures listed in Section VIII(a) would reduce construction-related vibration and noise impacts to the maximum extent feasible. Furthermore, Section 4.12.070 of the Santa Monica Municipal Code addresses vibration during construction activities, and it states: "The vibration caused by construction activity, moving vehicles, trains, and aircraft shall be exempt from this Section." Accordingly, the Proposed Project would include mitigation measures to reduce potential vibration impacts, and impacts would be considered less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would introduce substantial new sources of noise or would substantially add to existing sources of noise within the

vicinity of a Project Site during the operation of a project. As discussed in Section VIII(a), the development of the Proposed Project would not increase student population and would not generate additional traffic volumes on the surrounding street system. As such, operational noise impacts associated with traffic volumes would remain unchanged. Post-construction noise levels would not exceed the exterior standards of 65 dBA for residential and school uses established by the Noise Element of the City of Santa Monica and the California Department of Health, and Project operations would not result in a perceptible change in the noise environment as compared to existing conditions. Therefore, the operational impacts of the Proposed Project would be considered less than significant.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of a Project Site during construction or on a periodic basis during the operation of a project. As discussed in Section VIII(a), the Proposed Project would potentially generate high noise levels during the short-term grading, construction, and demolition periods as a result of heavy machinery and equipment use. Although construction noise impacts associated with the Proposed Project would be temporary and intermittent in nature, it is acknowledged that construction noise may pose an annoyance to sensitive receptors (i.e., residential and institutional uses surrounding the Project Site). These impacts, however, would be reduced to less-than significant-levels through the mitigation measures recommended in Section VIII(a), and would cease after the project is constructed.

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

No Impact. This question would apply to a project only if it were located within two miles of a public airport or if a project was within an airport land use plan. The nearest airport to the Project Site is the Santa Monica Municipal Airport, located approximately 2.7 miles southeast of the Project Site, and the Project Site is not located within an airport land use plan. No impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located in the vicinity of a private airstrip. No impact would occur.

IX. PUBLIC SERVICES

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

(i) Fire protection?

Less Than Significant Impact. A significant impact may occur if the City of Santa Monica Fire Department could not adequately serve the Proposed Project based on response time, access or fire hydrant/water availability.

The nearest Fire Station to the Project Site is Fire Station Number 125, located at 2450 Ashland Avenue, approximately ¾ of a mile from the Main SMC Campus. Fire Station Number 125 is equipped with 1 engine (paramedic unit), 1 ARFF, 1 truck (reserve), and 1 engine (reserve).

Fire flow requirements vary from 2,000-3,000 gallons per minute (gpm) in school areas. However, the Proposed Project may require provision of off-site public and on-site private fire hydrants. The number and location of the fire hydrants would be determined by the Santa Monica Fire Department.

The Project Site is located within the recommended response distance; therefore no impact related to response time or distance is anticipated. Additionally, as discussed in Section X(a), the Project would not impact traffic congestion at area intersections and would not affect emergency vehicle response capabilities.

The development of the Proposed Project would be designed to provide unobstructed access at all times. Emergency access would be ensured through a City of Santa Monica Fire Department Access Compliance (AC) review and a Fire and Life Safety (FLS) review by the Division of the State Architect prior to approval of project drawings and specification documents.

The Proposed Project would not increase student population. Implementation of the Proposed Project would, therefore, not be expected to generate new or altered fire protection services from the City of Santa Monica Fire Department. Additionally, the Proposed Project would upgrade existing structural, mechanical, electrical and plumbing facilities which would result in an improvement to fire suppression and safety as compared to existing conditions. As such, no significant impacts to fire protection services are expected. However, the following mitigation measure is recommended to ensure that impacts would remain less than significant.

Mitigation Measure

38. The following fire safety measures shall be incorporated into the building plans and shall be submitted to the Fire Department for approval prior to the approval by the Division of the State Architect. The plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant.

(ii) Police protection?

Less Than Significant Impact. The Proposed Project Site is served by the Santa Monica College Police Department (SMCPD). The SMCPD headquarters is located at 1718 Pearl Street adjacent to the SMC Main Campus. The Santa Monica College Police Department is a dedicated, full service police department available 24 hours a day, 365 days a year. 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 Proposed Project would be well illuminated and designed to ensure the safety of its users. Since the Proposed Project would not result in an increase in student population, implementation of the Proposed Project would not be expected to result in an increase in the demand for police services from the SMC or the City of Santa Monica Police Departments. While the Proposed Project would be patrolled, police services would be similar to those required by the existing uses on the Project Site. Overall, police service impacts and staffing needs are based on the population served, which would not change as a result of the development of the Proposed Project. Therefore, the Project impacts on police services would be less than significant.

X. TRANSPORTATION/CIRCULATION

a) Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)?

Less Than Significant Impact. Regional access to the SMC Main Campus is provided by the Santa Monica Freeway (Interstate 10 Freeway). Access from the SMC Main Campus to the Interstate 10 Freeway is obtained via Cloverfield Boulevard for traffic to and from the east, and via 20th Street for traffic to and from the west. Arterial streets carry the majority of the traffic traveling through the City and are generally commercial corridors. Arterial streets within the project area include Pico Boulevard, Ocean Park Boulevard, Lincoln Boulevard, and Cloverfield Boulevard (north of Pico Boulevard). Collector streets are intended to provide movement of traffic between arterials and neighborhoods. Collector streets in the study areas include 14th Street (north of Pico Boulevard), 20th Street, 23rd Street, and Cloverfield Boulevard (south of Pico Boulevard) within the study area. Feeder streets provide movement of traffic similar to collector

streets but are intended to carry fewer vehicles than collector streets. Feeder streets in the study area include Pearl Street, 14th Street (south of Pico Boulevard), and 17th Street. Santa Monica College provides a public transit system which transfers SMC students from off-site parking lots located in the vicinity to the SMC Main Campus due to insufficient student parking during peak demand. The public transit is operated by Santa Monica Municipal Bus Lines and is funded by Santa Monica College. There is no charge to students or staff for use of this service.

Generally, the Proposed Project would result in the development of approximately 62,005 asf of Campus related uses and the demolition and inactivation of approximately 67,124 asf of Campus related uses, resulting in a decrease of approximately 5,119 asf. In addition to the decrease in asf, the Proposed Project would also result in a decrease of 178 student seats on the SMC Main Campus. Accordingly, the Proposed Project would not be considered a growth inducing project and would not create any new vehicle trips to the SMC Main Campus. As stated above, the College currently provides a public transit service for students and staff in order to satisfy current parking demands generated by the SMC Main Campus. Accordingly, as the Proposed Project would not increase the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections in the project area, impacts would be considered less than significant.

Neighborhood Traffic Analysis

Projected future neighborhood traffic and operating conditions for the Proposed Project are anticipated to slightly reduce neighborhood traffic impacts. While the Proposed Project would not generate additional students or increase vehicle trips, the Proposed Project would result in the increase of approximately 323 parking spaces on the Campus. Currently, the parking lots located on the Project Site and other areas of the Campus see a high number of students, staff, and visitors. Often during peak demand, these users are turned away as a result of insufficient on-Campus parking and are then forced back to the street system and adjacent neighborhood to search for parking. The Proposed Project would help to accommodate this current demand, and would therefore result in fewer cars returned to Pico Boulevard and the adjacent neighborhood in search of parking. As such, implementation of the Proposed Project would not adversely impact neighborhood traffic conditions, and the Proposed Project is anticipated to slightly improve the current neighborhood traffic conditions. Therefore, impacts would be considered less than significant.

b) Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact may occur where adopted California Department of Transportation (CALTRANS) and the County of Los Angeles Metropolitan Transit Authority (MTA) thresholds for a significant project impact are exceeded. To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by

Proposition 111. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority, the local CMP agency, to implement the statutory requirements of the CMP. The countywide approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring the network' LOS standards.

Significance Criteria

The CMP Project traffic impact analysis (TIA) guidelines require analyses of all CMP monitoring intersections where the Project could add a total of 50 or more trips during either peak hour. Additionally, all freeway segments where a Project could add 150 or more trips in either direction during the peak hours must be analyzed.

CMP and Freeway Segment Analysis

The Proposed Project is not designed to increase employment or accommodate additional students. And, as stated above, the Proposed Project would not generate any new vehicle trips to the Campus. Thus, given the reduction of asf and classroom seats, projected future traffic volumes and operating conditions under the Proposed Project scenario would be the same or less than the existing conditions. The State CMP trip threshold to prepare a CMP analysis (stated above) would not be exceeded since the Proposed Project would not result in any new trips. Therefore, the Proposed Project would not require a CMP traffic impact analysis and, thus, impacts with regard to future traffic volumes would be less than significant.

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

No Impact. This question would apply to a project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses, and would not include the development of any aviation-related uses. No impact would occur.

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

No Impact. A significant impact may occur if a project included new roadway design or introduced a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazard conditions.

The development of the Proposed Project would be designed to provide unobstructed access at all times. Emergency access would be ensured through a City of Santa Monica Fire Department

Access Compliance (AC) review and a Fire and Life Safety (FLS) review by the Division of the State Architect prior to approval of Project drawings and specification documents.

As indicated previously, construction of the Proposed Project would create temporary alterations to the SMC Main Campus traffic flow due to temporary driveway closures or other access limitations during construction and demolition. Since the proposed construction area is internal to the Campus, haul trucks would not be parked or staged on adjacent residential roadways to the maximum extent feasible.

The Proposed Project would not design any new roadways or introduce a new land use or Project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area. No hazardous road conditions would be created by the design of the Proposed Project. No impacts would occur.

e) Would the project result in inadequate emergency access?

No Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

The development of the Proposed Project would be designed to provide unobstructed access at all times. Emergency access would be ensured through a City of Santa Monica Fire Department Access Compliance (AC) review and a Fire and Life Safety (FLS) review by the Division of the State Architect prior to approval of Project drawings and specification documents.

As stated above, construction of the Proposed Project would create temporary alterations to the SMC Main Campus traffic flow due to temporary driveway closures or other access limitations during construction and demolition. However, the operation of the Proposed Project would not generate any new vehicle trips, and the Project Site and surrounding roadways would remain accessible to emergency vehicles throughout the construction and operation process. Thus, the Proposed Project would not result in any impact upon emergency access.

f) Would the project result in inadequate parking capacity?

Less Than Significant Impact. A significant impact may occur if a project resulted in inadequate parking capacity. The Proposed Project would involve the removal of 177 total surface parking spaces in Lots 1 and 5 along Pico Boulevard during the construction process. The Proposed Project would include a 3-level subterranean parking garage that would contain approximately 500 parking spaces. Accordingly, the Proposed Project would Provide an approximate increase of 323 on site parking spaces.

Existing access to the surface parking lot located north of Drescher Hall is provided by an ingress/egress driveway on Pico Boulevard. Access to the surface parking located on the

northeast side of the Campus is currently provided with an ingress/egress driveway located on Pico Boulevard, an egress only driveway to Pico Boulevard located on the northeast corner of the Project Site, and an alley near the northeast corner of the Project Site.

Under the Proposed Project, the parking lot and access driveway located to north of Drescher Hall would be removed. Access to the proposed 3 level subterranean parking garage would be provided by an ingress/egress driveway from Pico Boulevard. The current egress driveway onto Pico Boulevard and the ingress/egress from the alley on the east would be maintained. It should be noted the ingress driveway from the alley would not allow for direct access to the subterranean garage, and would primarily be used for access for short term parking provided at grade along the east side of the Project Site. Additionally, a pedestrian drop off area would be provided on the north side of the Project Site near the Student Services Plaza. Pedestrian access to the subterranean parking garage would be provided through a sunken parking plaza which will be located between the Student Services Plaza and the Student Services Building.

The Proposed Project would not result in the increase of student population or include development that would result in an increase on current parking demand. On the contrary, as the Proposed Project uses would not result in any increased parking demand, the net increase of 323 parking spaces generated by the construction of the 3-level subterranean garage would help to accommodate the current on-Campus parking deficiencies during peak demand. Therefore, as the Proposed Project would improve parking conditions for the Campus, impacts with respect to parking capacity would be less than significant.

g) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. A significant impact may occur if a project were to conflict with adopted polices or involve modification of existing alternative transportation facilities located onor off-site.

The Proposed Project is designed to accommodate a potential bus pull out area on Pico Boulevard located north of Drescher Hall. The pull out improvements would be a separate project undertaken by the City of Santa Monica. This improvement would allow for BBB to pull off of Pico Boulevard and would help alleviate traffic heading eastbound. Ultimately, this feature would enhance the functions and appearance of the SMC frontage along Pico Boulevard.

The Proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation. Impacts would be considered less than significant.

XI. UTILITIES

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

Less Than Significant Impact. A significant impact would occur if the Project generated a need for wastewater treatment facilities or infrastructure beyond the capacity of the existing system. The Proposed Project is located within the Hyperion Treatment Plant (HTP) service area. The HTP is located in the community of Playa Del Rey southwest of Los Angeles International Generally, the Proposed Project would result in the development of approximately 62,005 asf of campus related uses and the demolition and inactivation of approximately 67,124 asf of campus related uses, yielding a net reduction of 5,119 asf. Also, the College aims to achieve LEED® certification for the Proposed Project by installing energy conservation features and low-flow plumbing fixtures which would decrease water and wastewater demand as compared to existing conditions. Therefore, the wastewater generated by the Proposed Project would be less than that generated by the existing facilities that are proposed to be demolished and/or retired. No industrial discharge into the wastewater or drainage system would occur. Currently, the Project Site is served by an 8-inch sewer line from Pico Boulevard that runs beneath the existing Admissions & Student Services Complex. The location of this sewer in combination of the proposed footprint for the Proposed Project would result in minimal, if any, trenching in order to connect the proposed structures to the service line. Further, the Proposed Project would not increase wastewater discharge volumes for the SMC Main Campus, and would therefore not introduce an increased demand on HTP for wastewater services. Accordingly, the Proposed Project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB), and impacts associated with the Proposed Project would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Water is currently supplied to the SMC Main Campus by groundwater and imported water. Imported water is supplied by the Metropolitan Water District of Southern California (MWD). Generally, the Proposed Project would result in the development of approximately 62,005 asf of campus related uses and the demolition and inactivation of approximately 67,124 asf of campus related uses, yielding a net reduction of 5,119 asf. Also, the College aims to achieve LEED® certification for the Proposed Project which would decrease water and wastewater demand as compared to existing conditions. Therefore, the water supply demand generated by the Proposed

Project would be less than that generated by the existing facilities that are proposed to be demolished and/or retired. Therefore water supply lines in the vicinity of the Project Site are sufficient to supply the anticipated water needs of the Proposed Project. In the event that additional water hook-ups are required for the Project Site, any disruption in service would be less than significant.

The Proposed Project would also include a connection to an existing City-owned reclaimed water line located under Pico Boulevard to the west of the SMC Campus. This connection would provide reclaimed irrigation (grey water) to the landscaping components provided within the Project Site and could eventually provide the opportunity to expand reclaimed irrigation use throughout the Campus providing significant improvements for water conservation. The connection process would involve temporary trenching beneath Pico Boulevard for a length of two to three blocks to connect to the existing line.

Additionally, to conserve water to the maximum extent possible, the City of Santa Monica recommends water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). The Proposed Project would in include a landscape plan that would feature many drought tolerant plants to minimize water usage. In addition, the Proposed Project would be required to be constructed in accordance with Title 24 measures, including the installation of water conservation features such as low flow toilets and shower heads. Therefore, given the amount of water consumption for the Proposed Project, and compliance with applicable water conservation ordinances and regulations, Project impacts upon water resources would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff increases to a level exceeding the capacity of the storm drain system serving a Project Site.

Currently, stormwater runoff from the existing Project Site is discharged into two main storm drain lines, the Pico Boulevard drain and the Kenter Canyon Drain, which have a common outfall where Pico Boulevard meets the Santa Monica Beach. The Project Site currently contains several buildings, surface parking areas, and contains a large amount of impervious surfaces. The Proposed Project would involve demolition of the buildings and the surface parking lot, and would include an extensive landscape plan that would improve stormwater retention capabilities for the Project Site. As the Proposed Project would result in a decrease of impervious surfaces as

compared to existing conditions, the Proposed Project would not result in a net increase of stormwater runoff entering the existing storm drain infrastructure.

No deficiencies in affected infrastructure are known to exist now, nor are any anticipated with implementation of the Proposed Project. Therefore, impacts are anticipated to be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. As described in Section XI(b) above, the Proposed Project would strive for LEED® certification and would include several water conservation features that would actually reduce the water demand as compared to the existing conditions. Therefore, the MWD is anticipated to be able to meet the water demand for the Proposed Project without the need for new or expanded entitlements and/or resources. Impacts are anticipated to be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. As stated above, the Proposed Project would strive for LEED® certification and would include several conservation features that would actually reduce the wastewater demand as compared to the existing conditions. Therefore, the Hyperion Treatment Plant is anticipated to be able to meet the wastewater service needs for the Proposed Project, as the amount of wastewater currently generated by the Project Site would not increase. Impacts would be considered less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Western Waste collects solid waste from the Santa Monica College, which is carried by Western Waste to the Carson Transfer Station in

the City of Carson.¹⁷ From the Transfer Station the waste is taken to Puente Hills Landfill, which has a remaining capacity of approximately 30.5 million tons.¹⁸ In addition, the County of Los Angeles could potentially seek additional capacity from landfills in Orange, Riverside, and Ventura Counties.

As stated previously, the Proposed Project would result in the development of approximately 62,005 asf of campus related uses and the demolition and inactivation of approximately 67,124 asf of campus related uses, yielding a net reduction of 5,119 asf. Therefore, the solid waste generated by the Proposed Project would be similar to, or perhaps less than, the amount generated by the existing facilities that are proposed to be demolished and/or retired. As the amount of solid waste generated by the Proposed Project would not result in an increase of demand for solid waste services, impacts from the Proposed Project are anticipated to be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. As stated in Section XI(f) above, the Proposed Project would not result in an increase of demand for solid waste services as compared to existing conditions. Solid waste generated on-site would be disposed of in accordance with all applicable federal, state, and local regulations related to solid waste. And, as the Project Site is located in the State of California, it would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939) which was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum amount feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000 and 70 percent by the year 2020. Impacts would be considered less than significant.

XII. NEIGHBORHOOD EFFECTS

a) Will the proposal have considerable effects on the project neighborhood?

Less Than Significant Impact. A significant impact may occur if a project were to have considerable effects on the project neighborhood. Neighborhood effects in the Project area are limited to the Project location on a developed college campus that consists of various school facilities and parking structures. The sections provided above have stated that the Proposed Project would not adversely impact the project neighborhood. And, in the case of parking and

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Environmental Affairs Committee, <u>Santa Monica College Environmental Audit</u>, December 1993.

County Sanitation Districts of Los Angeles County, Puente Hills Landfill Annual Report, November 2006 website: http://www.lacsd.org/about/solid_waste_facilities/puente_hills/default.asp, accessed November 16, 2007.

neighborhood traffic conditions, the Proposed Project would actually improve conditions in the project neighborhood. Further, the Proposed Project would include visual improvements along Pico Boulevard, and will provide upgraded facilities to the Campus which will enhance the function and visual appearance of the Project Site and Campus as a whole. The proposed Student Services Replacement Building would be three-stories tall, and the height of the proposed structure would be comparable to other Campus and neighborhood structures in the area. Overall, the Proposed Project is not expected to have considerable effects on the Project neighborhood, and impacts would be less than significant.

XIII. CONSTRUCTION IMPACTS

a) Will the proposal have considerable effects as a result of project construction?

Potentially Significant Unless Mitigation Incorporated A significant impact may occur if a project were to have considerable effects as a result of project construction. This section focuses on the potential construction impacts associated with construction traffic, construction worker parking, and construction equipment staging. For specific construction impact analysis with respect to air quality, noise, and other environmental issues, please refer to their respective sections above.

Construction Traffic Analysis

Construction of the Proposed Project would create temporary alterations to the SMC Main Campus traffic flow due to temporary driveway closures or other access limitations during construction and demolition. Additionally, as construction activities for building and garage construction, the Big Blue Bus pull out, and the water reclamation connection would take place along the Pico Boulevard frontage, temporary lane closures and altered traffic flow conditions could occur on Pico Boulevard. While the precise phasing of these components is not known at this time, access for current campus users that currently enter on or near the Project Site, would be able to access the Campus through other driveways and parking structures located throughout the Campus. Current Campus users that park on the surface parking on the Project Site would be temporarily directed to existing off-site parking locations and would be transported to the Campus using the existing Campus transit system. Construction vehicle access would be provided from the ingress/egress and egress driveway located on Pico Boulevard. For the demolition of the Counseling Complex and Bursar's office, construction vehicles would enter the Campus from Pearl Street at the southeast corner of the Campus. For the removal of the modular buildings that contain the Counseling Annex use, it is anticipated that those structures would not require on-site demolition and would be towed off Campus.

Construction Worker Parking & Equipment Staging

Construction worker vehicles and equipment would be parked or staged on the northeast corner of the Project Site. During the peak construction period for the subterranean parking garage, up to 100 construction worker vehicles would be required to park on site for an approximate one to two month period. This demand may require construction vehicle parking to slightly expand south into Lot 1. All parking needs for the SMC Main Campus that would be temporary lost during the construction process would be redirected to off Campus lots, and those users would be transported to the Campus via the existing Campus transit system. Upon completion of the subterranean parking garage, the construction worker vehicle parking and equipment staging area would be held entirely on the Project Site as the newly constructed parking garage would be able to accommodate the construction parking demand. The Proposed Project will require a construction management plan that will address construction activity and site constraints.

Based on the information provided above, while construction activities could create temporary issues with respect to driveway closures, lane closures on Pico Boulevard, access limitations to Campus, and temporary parking issues, the Proposed Project would be required to implement a construction management plan to ensure that all temporary construction impacts would be mitigated to levels of insignificance. The Preferential Parking Zone (PPZ) that surrounds the SMC Main Campus would further act to protect the surrounding neighborhoods for spillover parking impacts. Additionally, it should be noted that the College would schedule the most intrusive and disruptive construction activities during non-peak periods of the school year so as to minimize construction impacts on SMC students, users, and the community to the maximum extent feasible. Therefore, with the mitigation measure provided below, impacts during construction of the Proposed Project would be considered temporary and less than significant.

Mitigation Measure

39. The Proposed Project shall include a construction management plan to ensure all construction activities would be implemented in a manner to limit adverse and temporary impacts to the maximum extent feasible. All construction activities would be required to comply with all federal, state, and local guidelines, restrictions and regulations.

Additionally, although no evidence of soil contamination was identified in the geotechnical investigation performed for the Project Site, the following precautionary mitigation measure has been added to the Final IS/MND at the recommendation of the Department of Toxic Substances Control (DTSC) to ensure that if any contaminated soil is encountered during site excavation for the Proposed Project that impacts would be mitigated to a less-than-significant level.

40. If during construction of the project, soil contamination is suspected, construction in the area shall stop, and appropriate health and safety procedures shall be implemented. If it is determined that contaminated soils exists, the SMCCD shall contact the Site Mitigation

<u>Unit (SMU) of the Health Hazardous Materials Division, Los Angeles County Fire Department. The SMU will determine the appropriate investigation and/or remediation method(s) to ensure protection of public health and the environment.</u>

XIII. MANDATORY FINDINGS OF SIGNIFICANCE

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

No Impact. A significant impact may occur only if a project has been an identified as having potentially significant impacts for any of the above issues, as discussed in the preceding sections. The Proposed Project is located in a densely populated urban area and would have no impact with respect to biological resources. The Project would not have any impacts upon any historic structures or landmarks. The Proposed Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or prehistory. No impact would occur.

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but significant when viewed together. As stated in the sections above, the Proposed Project would not create an increase in student population, would not generate new vehicle trips to the Project Site, and would not result in any significant operational impacts. Accordingly, the Project's incremental contribution to cumulative traffic, air quality, and other impact areas would also be less than significant. Therefore, the Project's contribution to cumulative impacts would not be considered cumulatively considerable.

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

Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As stated in the sections above, the Proposed Project includes several mitigation measures to ensure that the Proposed Project would not result in any substantial adverse effects on human

beings. Thus, with implementation of the proposed mitigation measures, the Proposed Project would not result in substantial adverse effects on human beings.

V. PREPARERS OF THE INITIAL STUDY AND PERSONS CONSULTED

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VI. ACRONYMS AND ABBREVIATIONS

AQMP Air Quality Management Plan

asf assignable square feet
AC Access Compliance

ACMs Asbestos containing materials

ANSI American National Standard Institute

BMPs Best Management Practices

Caltrans California Department of Transportation

CDFG California Department of Fish and Game

CEQA California Environmental Quality Act

CMP Congestion Management Program

CNEL Community Noise Equivalent Level

cy Cubic yards

dBA A-weighted decibel

DSA Division of the State Architect

EPA Environmental Protection Agency (see also USEPA)

FAR Floor Area Ratio

FEMA Federal Emergency Management Agency

FLS Fire and Life Safety

gpm Gallons per minute

HTP Hyperion Treatment Plan

IS/MND Initial Study/Mitigated Negative Declaration

LARWQCB Los Angeles Regional Water Quality Control Board

LEED Leadership in Energy and Environmental Design ®

Mph miles per hour

MTA Metropolitan Transit Authority

MWD Metropolitan Water District

NPDES National Pollution Discharge Elimination System

ogsf outside gross square feet

PM₁₀ Respirable Particulate Matter

ppm Parts per million

PPZ Preferential Parking Zone

RCPG Regional Comprehensive Plan and Guide

RTP Regional Transportation Plan

SCAB South Coast Air Basin

SCAG Southern California Association of Governments
SCAQMD South Coast Air Quality Management District

sf Square foot

SMCCD Santa Monica Community College District

SMCPD Santa Monica College Police Department

SMPD Santa Monica Police Department

SWRCB State Water Resources Control Board SOPA Society of Professional Archaeologist

 SO_2 Sulfur dioxide SO_x Sulfur oxides

STIP State Transportation Improvement Program
SUSMP Standard Urban Stormwater Mitigation Plan

TIA Traffic Impact Analysis
VMT Vehicle Miles Traveled

VII. MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

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

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

ENFORCEMENT

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

PROGRAM MODIFICATION

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

MITIGATION MONITORING AND REPORTING PROGRAM

The organization of the MMRP follows the subsection formatting style as presented within the IS/MND for the Student Services Replacement, Bookstore Modernization and Pico Promenade Improvements Project. Subsections of all of the environmental issues presented in the IS/MND are provided below in Table VII-1. For environmental issue areas where no mitigation measures were required, the MMRP is noted accordingly.

Table VII-1
Mitigation Monitoring and Reporting Program

	Mitigation Measure	Action Required	Action Required Monitoring Phase		Comp	liance Ver	ification
	<u> </u>	1		Agency or Party	Initial	Date	Comments
I. Air Q	Quality						
1.	All unpaved demolition and construction areas shall be wetted at least three times daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403.	Field check to confirm measures are implemented.	Pre-construction and construction.	SMCCD			
2.	The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.	construction contract;Field check to	Pre-construction and construction.	SMCCD			
3.	All loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction and construction.	SMCCD			
4.	All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.		Pre-construction and construction.	SMCCD			
5.	Soil stabilizers shall be applied to inactive construction areas.	Incorporate into construction contract;	Pre-construction and construction.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Comp	oliance Ver	ification
	g			Agency or Party	Initial	Date	Comments
		Field check to confirm measures are implemented.					
6.	Ground cover in disturbed areas shall be quickly replaced.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction and construction.	SMCCD			
7.	All haul roads shall be watered three times daily.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction and construction.	SMCCD			
8.	All stock piles of debris, dirt, or rusty materials shall be covered with a tarp.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction and construction.	SMCCD			
9.	Vehicle speed on unpaved roads shall be reduced to less than 15 miles per hour (mph).	 Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction and construction.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Comp	oliance Vei	rification
	O Committee of the comm	•	S	Agency or Party	Initial	Date	Comments
II. Ae	sthetics					-	•
10.	To reduce spillover lighting impacts, all Project lighting shall be directed onto the site, and all lighting shall be shielded from adjacent roadways and off-site properties. And, the Project shall use low wattage security lighting.	Plan approval	Pre-construction.	SMCCD			
11.	Atmospheric lighting pollution shall be minimized by utilizing lighting fixtures that cut-off light directed to the sky.	Plan approval	Pre-construction.	SMCCD			
12.	All structures shall incorporate non- reflective exterior building materials in their designs. Any glass to be incorporated into the facades of the buildings should either be of low- reflectivity or accompanied by a non- glare coating.	Plan approval	Pre-construction.	SMCCD			
III. B	iological Resources					•	
No mi	tigation measures required.	N/A	N/A	N/A	N/A	N/A	N/A
IV. C	ultural Resources						
13.	If any archaeological or paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery. The services of a professional archaeologist or paleontologist shall be secured by contacting the Center for Public	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Comp	oliance Ver	ification
	U	•	S	Agency or Party	Initial	Date	Comments
14.	Archaeology - Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist and/or the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Museum to assess the resources and evaluate the impact. Based on the significance of any discovery, the consulting archaeologist or paleontologist shall provide recommendations to mitigate any potential impacts. Copies of the archaeological or paleontological surveys, studies or reports shall be submitted to the UCLA Archaeological Information Center.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD			
15.	In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code and Public Resources Code. These code provisions require notification of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased	Incorporate into construction contract; Field check to confirm measures are implemented.	During construction.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Comp	Compliance Verification		
	Ü		C	Agency or Party	Initial	Date	Comments	
	Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains.							
V. Ge	ology and Soils							
16.	The Project shall comply with all applicable building and safety guidelines, restrictions, and permit regulations, including the Uniform Building Code for Seismic Zone 4 and the California Department of Conservation, Division of Mines and Geology Requirements.		Pre-construction, construction, and operation.	SMCCD				
17.	Appropriate erosion control and drainage devices shall be incorporated to minimize erosion to the maximum extent feasible.		Pre-construction and construction.	SMCCD				
18.	Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD				
VI. H	azards and Hazardous Materials							
19.	Prior to the issuance of a demolition permit, the applicant shall provide a letter to the SMC Office of Facilities Planning from a qualified asbestos	 Incorporate into construction contract; Field check to confirm measures are 	Pre-construction.	SMCCD				

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Compliance Verification		
	Ü	•	C	Agency or Party	Initial	Date	Comments
	abatement consultant stating that no ACMs are present in the structures. If ACMs are found to be present, such materials will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other state and federal rules and regulations.	implemented.					
20.	Development of the Proposed Project would require Access Compliance (AC) review and Fire and Life Safety (FLS) review by the Division of the State Architect prior to approval of the final Project plans and specifications.	 Plan approval; Field check to confirm measures are implemented. 	Pre-construction and operation.	SMCCD			
VII. H	ydrology and Water Quality						
21.	During construction, the Project applicant shall implement all applicable BMPs in accordance with the SUSMP and City of Santa Monica Stormwater Management Program. These BMPs shall include, but not be limited, to the following: Incorporate a BMP or a combination of BMPs best suited to maximize the reduction of pollutant loadings in runoff to the maximum extent practicable; All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as: "NO DUMPING-DRAINS TO OCEAN") and/or graphical icons to discourage	Incorporate into construction contract; Field check to confirm measures are implemented.	Pre-construction and construction.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Comp	ification	
	-			Agency or Party	Initial	Date	Comments
22.	illegal dumping; Legibility of stencils and signs must be maintained; Trash container areas must have drainage from adjoining roofs and pavement diverted around the areas; Trash container areas must be screened or walled to prevent off-site transport of trash; As part of project review, if a project applicant has included or is required to include Structural or Treatment Control BMPs in project plans, SMC shall require that the project contractor provide verification of maintenance provisions through such means as may be appropriate, including but not limited to, legal agreements, covenants, and/or CEQA mitigation requirements. SMC shall implement stormwater BMPs	11 /	• Pre-construction	SMCCD			
	to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the County of Los Angeles Standard Urban Stormwater Mitigation Plan. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	and operation.	SACCE			

	Mitigation Measure	Action Require	ed Monitoring Phase	Responsible	Comp	oliance Vei	rification
	Managarion Measure	redon require	Tromtoring Finasc	Agency or Party	Initial	Date	Comments
23.	Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion.	Field check to confirm measure implemented.	During operation.	SMCCD			
24.	Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, veechannels, and inlet and outlet structures. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.	Plan approval; Incorporate into construction con Field check to confirm measure implemented.	ntract;	SMCCD			
25.	Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.	Field check to confirm measure implemented.	Pre-construction and operation.	SMCCD			
26.	Storage areas shall be paved and sufficiently impervious to contain leaks and spills.	Plan approval;Field check to	Pre-construction and operation.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase	Responsible	Comp	liance Ver	rification
	9	•		Agency or Party	Initial	Date	Comments
		confirm measures are implemented.					
27.	Storage areas shall have a roof or awning to minimize collection of stormwater within the secondary containment area.		Pre-construction and operation.	SMCCD			
28.	Runoff shall be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator; (2) a filtration or (3) infiltration. Dynamic flow separator uses hydrodynamic force to remove debris, and oil and grease, and is located underground. Filtration involves catch basins with filter inserts. Infiltration methods are typically constructed on-site and are determined by various factors such as soil types and groundwater table. If utilized, filter inserts shall be inspected every six months and after major storms, cleaned at least twice a year.	Field check to confirm measures are implemented.	Pre-construction, construction, and operation.	SMCCD			
29.	Any connection to the sanitary sewer shall require authorization from the City of Santa Monica.		Pre-construction and during construction.	SMCCD			

Mitigation Measure		Action Required	Monitoring Phase Responsible Agency on Porty			rification	
		-		Agency or Party	Initial	Date	Comments
VIII. N	loise						
30.	Pursuant to Section 4.12.110 of the Municipal Code, no demolition of buildings, excavation/grading or construction activity is permitted before 8 a.m. or after 6 p.m. on Monday through Friday, before 9 a.m. or after 5 p.m. on Saturday, all day on Sunday, and on all national holidays.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD			
31.	Prior to construction, the contractor shall submit a list of equipment and activities required during construction to the SMC Office of Facilities Planning.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction.	SMCCD			
32.	If it is determined that construction noise would exceed 90 dBA at a distance of 50 feet or greater, the use of the equipment which produces such noise would be limited to between the hours of 10 a.m. to 3 p.m.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD			
33.	All construction equipment shall be in proper operating condition and fitted with standard factory noise attenuation features.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD			
34.	Sound blankets shall be used on all construction equipment where technically feasible.	Incorporate into construction contract;Field check to	During construction.	SMCCD			

Mitigation Measure		Action Required	Monitoring Phase	Compliance Verification			
	C	·	Agency or Par		Initial	Date	Comments
		confirm measures are implemented.					
35.	A construction relations officer shall be appointed by the College to act as a liaison with neighbors and residents concerning on-site construction activity.	Field check to confirm measures are implemented.	During construction.	SMCCD			
36.	Stockpiling and vehicle staging areas shall be located away from occupied dwellings and other sensitive receptors to the extent feasible.	 Incorporate into construction contract; Field check to confirm measures are implemented. 	During construction.	SMCCD			
37.	Noise-generating mechanical equipment shall not be located on the side of any building which is adjacent to a residential building on the adjoining lot. Roof locations may be used when the mechanical equipment is installed within a sound rated, parapet enclosure.	 Plan approval; Field check to confirm measures are implemented. 	Pre-construction and during construction.	SMCCD			
IX. Pu	IX. Public Services						
38.	The following fire safety measures shall be incorporated into the building plans and shall be submitted to the Fire Department for approval prior to the approval by the Division of the State Architect. The plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an	Plan approval.	Pre-construction.	SMCCD			

Mitigation Measure	Action Required	Monitoring Phase	Responsible Agency or Party	Compliance Verification		
	-			Initial	Date	Comments
approved fire hydrant.						
X. Transportation/Circulation						
No mitigation measures required.	N/A	N/A	N/A	N/A	N/A	N/A
XI. Utilities						
No mitigation measures required.	N/A	N/A	N/A	N/A	N/A	N/A
XII. Neighborhood Effects						
No mitigation measures required.	N/A	N/A	N/A	N/A	N/A	N/A
XIII. Construction Impacts						
39. The Proposed Project shall include a construction management plan to ensure all construction activities would be implemented in a manner to limit adverse and temporary impacts to the maximum extent feasible. All construction activities would be required to comply with all federal, state, and local guidelines, restrictions and regulations.	 Plan approval; Incorporate into construction contract; Field check to confirm measures are implemented. 	Pre-construction and during construction.	SMCCD			

	Mitigation Measure	Action Required	Monitoring Phase Responsible		Comp	Compliance Verification		
	- C	-		Agency or Party	Initial	Date	Comments	
40.	If during construction of the project, soil contamination is suspected, construction in the area shall stop, and appropriate health and safety procedures shall be implemented. If it is determined that contaminated soils exists, the SMCCD shall contact the Site Mitigation Unit (SMU) of the Health Hazardous Materials Division, Los Angeles County Fire Department. The SMU will determine the appropriate investigation and/or remediation method(s) to ensure protection of public health and the environment.	Incorporate into construction contract;	Pre-construction and during construction.	SMCCD				

VIII. RESPONSES TO COMMENTS

The Notice of Intent (NOI) to adopt the Initial Study/Mitigated Negative Declaration (IS/MND) was circulated on December 7, 2007 advising the public and public agencies that the IS/MND would be made available for review and comment from December 7, 2007 to January 9, 2008. The NOI was distributed to the State Clearinghouse and was noticed in the Santa Monica Daily Press on December 7, 2007. Santa Monica College (SMC), as lead agency, voluntarily extended the comment period through January 16, 2008. SMC also held community presentations during the review period on January 3, 2008 at the Bundy Campus and on January 9, 2008 at the SMC Main Campus Library. The following comment letters on the IS/MND were received:

State Agencies

- 1. State of California, Office of Planning and Research, State Clearinghouse and Planning Unit, Terry Roberts, Director, January 7, 2008.
- 2. State of California, Department of Toxic Substances Control, Juli Oborne, Unit Chief, Southern California Cleanup Operations Branch-Glendale Office, January 7, 2008.
- 3. State of California, Native American Heritage Commission, Dave Singleton, Program Analyst, December 26, 2007, received by State Clearinghouse December 31, 2007.

Regional Agencies

4. Southern California Association of Governments (SCAG), Laverne Jones, Planning Technician, Program Development and Evaluation Division, December 28, 2007.

Individuals and/or Organizations

- 5. Friends of Sunset Park, Board of Directors, Zina Josephs, President, et al., January 14, 2008.
- Friends of Sunset Park, Board of Directors, Zina Josephs, President, January 9, 2008.
- 7. Jeanne Laurie, Sunset Park resident, January 8, 2008.

The comment letters and written responses to the comments are provided below. Copies of the original comment letters are also provided as Appendix F to the Final IS/MND.

COMMENT LETTER NO. 1

Terry Roberts, Director

State of California, Office of Planning and Research

State Clearinghouse and Planning Unit

1400 Tenth Street

P.O. Box 3044

Sacramento, CA 95812-3044

January 7, 2008

COMMENT 1.1

Dear Don Girard:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 4, 2008, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse
Enclosures, cc: Resources Agency

RESPONSE 1.1

This comment acknowledges receipt and review of the IS/MND by the State Clearinghouse. The Department of Toxic Substances Control and the Native American Heritage Commission (NAHC) were the other state agencies that provided comments on the IS/MND. Their comment letters and respective responses are provided below as Comment Letter No. 2 and No. 3, respectively. It should be noted that the SCH indicated the public comment period closed on January 4, 2008. SMC, as lead agency, provided notice that the comment period would close on January 9, 2008 and then voluntarily extended the comment period to January 16, 2008. No further response to this comment is required.

COMMENT LETTER NO. 2

Juli Oborne, Unit Chief

State of California, Department of Toxic Substances Control

Southern California Cleanup Operations Branch – Glendale Office
1011 North Grandview Avenue
Glendale, CA 91201

January 7, 2008

COMMENT 2.1

Dear Mr. Girard:

The Department of Toxic Substances Control (DTSC) has received your Notice of Completion of Initial Study/Mitigated Negative Declaration (MND) for the project mentioned above.

Based on the review of the document, DTSC comments are as follows:

If during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented. If it is determined that contaminated soils exists, the MND should identify how any required investigation and/or remediation will be conducted, and which government agency will provide regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact Mr. Alberto Valmidiano, Project Manager, at (818) 551-2870 or me, at (818) 551-2980.

Sincerely,

Juli Oborne

Unit Chief Southern California Cleanup Branch – Glendale Office

RESPONSE 2.1

This comment acknowledges receipt of the IS/MND by the DTSC. To satisfy the recommendations provided by DTSC, Mitigation Measure 40 has been added to the Final IS/MND:

40. If during construction of the project, soil contamination is suspected, construction in the area shall stop, and appropriate health and safety procedures shall be implemented. If it is determined that contaminated soils exists, the SMCCD shall contact the Site Mitigation Unit (SMU) of the Health Hazardous Materials Division, Los Angeles County Fire Department. The SMU will determine the appropriate investigation and/or remediation method(s) to ensure protection of public health and the environment.

COMMENT LETTER NO. 3

Dave Singleton, Program Analyst

State of California, Native American Heritage Commission (NAHC)

915 Capitol Mall, Room 364

Sacramento, CA 95814

December 26, 2007

COMMENT 3.1

Dear Mr. Girard:

The Native American Heritage Commission is the state agency designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c (CEQA guidelines). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/http://www.ohp.parks.ca.gov/1068/files/IC%20Roster.pdf. The record search will determine:

• If a part or the entire APE has been previously surveyed for cultural resources.

- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 $\sqrt{}$ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: <u>USGS 7.5-minute quadrangle citation with name, township, range and section.</u>
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE). In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s).

√ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{\text{Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.}$

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the Initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

 $\sqrt{}$ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine

whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

√ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton Program Analyst

Attachment: List of Native American Contacts

RESPONSE 3.1

The Project's potential impact upon archaeological resources was adequately addressed in the IS/MND. As stated on page IV-17, the Project Site is located in an urbanized area which has been previously disturbed by past activities. There are no known archaeological resources on the Project Site or off-site demolition locations. The Project Site is not located in an area designated by the City of Santa Monica as being in an archaeological site or survey area. Any archaeological resources which may have existed at one time have likely been previously unearthed or disturbed. While no further evaluation of this issue is recommended, periodic monitoring during construction was recommended to identify any unknown archaeological resources that may be accidentally uncovered during Project construction activity. While this impact would be considered less than significant, implementation of Mitigation Measures 13, 14, and 15, would ensure potential impacts would be mitigated to less than significant levels. Mitigation Measures 13, 14, and 15 are restated below for reference:

- 13. If any archaeological or paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery. The services of a professional archaeologist or paleontologist shall be secured by contacting the Center for Public Archaeology Cal State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist and/or the Center for Public Paleontology USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the County Museum to assess the resources and evaluate the impact. Based on the significance of any discovery, the consulting archaeologist or paleontologist shall provide recommendations to mitigate any potential impacts.
- 14. Copies of the archaeological or paleontological surveys, studies or reports shall be submitted to the UCLA Archaeological Information Center.
- 15. In the event that human remains are discovered, there shall be no disposition of such human remains, other than in accordance with the procedures and requirements set forth in California Health and Safety Code and Public Resources Code. These code provisions require notification

of the County Coroner and the Native American Heritage Commission, who in turn must notify those persons believed to be most likely descended from the deceased Native American for appropriate disposition of the remains. Excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains.

As the IS/MND adequately addresses the project's potential impacts upon archaeological resources and incorporated the NAHC's recommendation to include precautionary mitigation measures to mitigate impacts in the case of an accidental discovery of archeological resources, no further additions or corrections to the IS/MND are warranted.

COMMENT LETTER NO. 4

Laverne Jones, Planning Technician **Southern California Association of Governments (SCAG)**818 West Seventh Street, 12th Floor

Los Angeles, CA 90017-3435

December 28, 2007

COMMENT 4.1

Dear Mr. Lawson:

Thank you for submitting the Student Services Replacement, Bookstore Modernization and Pico Promenade Improvements Project for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Student Services Replacement, Bookstore Modernization and Pico Promenade Improvements Project, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's December 1-15, 2007 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1857. Thank you.

Sincerely,

Laverne Jones, Planning Technician Program Development and Evaluation Division

RESPONSE 4.1

This comment acknowledges receipt and review of the IS/MND by the Southern California Association of Governments (SCAG) and notes that the Proposed Project is not regionally significant per SCAG Intergovernmental Review Criteria and CEQA Guidelines (Section 15206). No response is required.

COMMENT LETTER NO. 5

Board of Directors **Friends of Sunset Park** P.O Box 5823 Santa Monica, CA 90409 January 14, 2008

COMMENT 5.1

Regarding the Initial Study/Mitigated Negative Declaration for the proposed Students Services Replacement, etc., Friends of Sunset Park, the city-recognized neighborhood organization that represents residents living west, south, and east of the SMC Main Campus has the following comments:

1. Air quality

a. On Page IV-2, the document asserts that since there would not be in increase in square footage of classroom space on the campus, the project would not increase air pollution. FOSP maintains that if the college increases parking capacity on the NE corner of the campus from 177 to 500 parking spaces, and the entrances and exits to and from the parking spaces are located near homes, that there will be a negative affect on air quality for residents living nearby.

RESPONSE 5.1

SMC's operational air quality emissions are primarily generated by vehicles traveling to and from the Main Campus, its satellite campuses, and remote parking lots. The Proposed Project would result in a net reduction of 178 classroom seats and a net reduction of 5,119 assignable square feet (asf) on the main campus. Vehicle trips to and from SMC's campuses are closely tied to the capacity of the classroom seats

and asf. Since the Proposed Project would result in a decrease of classroom seats and a net reduction of asf on the SMC Main Campus, both of which are considered trip-generating components, the project would not result in an increase of vehicle trips generated by the SMC Main Campus. Accordingly, regional air quality emissions associated with motor vehicles would also not be increased.

With respect to localized impacts as a result of increased parking capacity on the northeast corner of the Campus, it is not expected that the Proposed Project would result in a significant increase to traffic patterns at this location. Currently, Parking Lot 1 fronting Pico Boulevard functions as a staff parking lot with 177 parking spaces and includes a visitor information kiosk. As such, many vehicles enter Parking Lot 1 from Pico Boulevard and are redirected by the kiosk personnel to other parking structures on campus or to satellite campuses or remote parking lots. By increasing the capacity of the parking structure to include 500 spaces (a net increase of 323 parking spaces) many of the vehicle trips that are currently turned away from Lot 1 will be able to park on-site. As such, it is not anticipated that the parking structure would be generating a substantial increase in vehicle trips at this location.

Additionally, the subterranean parking garage would include a ventilation system that would be designed and operated in a manner that is consistent with the regulations identified by ANSI/ASHRAE Standard 62-1989 (ASHRAE 1989), which establishes safe ventilation standards for parking garages to prevent accumulation of contaminants that are hazardous to people's health. The ventilation system for the underground parking garage would cycle the vehicle emissions from the subterranean levels out of the structure to maintain healthy air quality levels and CO concentrations within the structure. For exterior emissions, particularly with respect to the adjacent neighbors on 20th Street, the exhaust of the ventilation system of the structure would be located over 55 feet from the Campus's eastern property line (separated by the portion of Lot 1 extending along the Campus's east boundary property), and an additional 30 to 35 feet of separation due to the 18th Court alleyway and the residential car ports. The ventilation system for the parking garage that would displace CO concentrations and associated fumes would therefore be located over 85 feet from any residential structure. As a result, the nearby residences would not be exposed to increased CO concentrations and would not be adversely affected.

COMMENT 5.2

Adding parking spaces on the Main Campus may also attract students who might otherwise park in the Olympic lot. And since Don Girard has told FOSP in the past that there are approximately 6,000 students and staff on campus at peak times, adding 323 parking spaces is certainly not going to meet current parking demand or minimize vehicle miles traveled (VMT) both within the project and in the community in which it is located, or reduce air pollutant emissions. We conclude, rather, that current short-term and visitor parking needs will still result in visitors being turned away and directed to off-site parking facilities.

RESPONSE 5.2

The Student Services Replacement Building parking structure is not going to alter SMC's parking transportation management plan to accommodate students who currently park in the Olympic Lot. The

new parking structure would primarily serve faculty that currently park in Lot 1 and the student services administrative functions and other functions that would be relocated to the new Student Services Replacement Building. SMC has implemented a number of transportation management programs in recent years, part of the institution's long-range plan to preserve student access and to enhance educational opportunities. SMC's goals are to improve lives for a sustainable future, to reduce congestion and vehicle trips, to maintain and improve neighborhood quality of life, and to reach parking self-sufficiency. Strategies have included greatly expanding online classes (about 20% of classes are now online), converting admissions and enrollment processes to online, modifying the weekly calendar so most classes meet only twice a week, providing satellite campus locations and a free offsite parking lot to reduce congestion on the main campus, and providing free intercampus transit between the main campus, the satellite campuses, and offsite parking locations.

Additionally, in 2007, in partnership with Big Blue Bus, SMC has implemented and is funding two new community public transit lines and one new direct public transit line to improve public transit to the Main Campus, Bundy Campus, Academy Campus, and the new Olympic Parking Lot. For the current year, SMC has committed \$414,427 to fund the new Sunset Ride, to increase frequency of service on the Crosstown Ride, and to fund a direct transit service line to Palms, Culver City, and West Los Angeles. Nonetheless, SMC continues to experience a parking deficiency on the Main Campus.

As stated on page IV-3 of the IS/MND, the surface parking lot located on the Project Site currently experiences a high number of visitors, students, and staff turned away as a result of insufficient parking during peak demand. The Proposed Project would help to accommodate this current demand, which would result in fewer cars returned to Pico Boulevard and the adjacent neighborhood in search of parking. While the proposed parking garage would provide additional spaces to accommodate parking demands on the SMC Main Campus associated with the student services functions, it is acknowledged that this new parking garage would not eliminate the need for college transportation management programs. However, by providing additional parking spaces within the Proposed Project, the implementation of the Proposed Project would reduce vehicle trips within the surrounding residential neighborhood that are currently generated by campus users in search of parking.

COMMENT 5.3

Nevertheless, we understand the college's need to make a dent in this parking shortage problem, and we ask that the entrances and exits to the new underground parking facility be moved away from residents as much as possible (i.e., from the east side of the building to the west side of the building). At the January 9th community presentation, one of the consultants stated that the traffic would be 80 feet from residential property, but we think that he was referring to the actual building entrances, not the driveways, which would be much closer.

RESPONSE 5.3

With respect to relocating the proposed entrances/exits for the subterranean parking garage, many alternatives were explored to study on-site vehicular circulation during the planning phase of the project.

One of the alternatives studied was providing a road to access the parking garage on the west side of the proposed Student Services building. While this location would maximize the distance of the driveways from the adjacent residents to the east, this alternative created many problems including insufficient stacking space for cars entering from Pico Boulevard, potentially impacting traffic along Pico Boulevard. In addition, this location would create potentially dangerous conflicts between campus pedestrian circulation and the on-site automobile traffic. Therefore, in consultation with SMC's traffic design consultant, it was determined that the best solution was to use the existing automobile circulation road on the east side of the Student Services building for on-site vehicular circulation.

The proposed parking structure driveways would not be located any closer to the residential properties on 20th Street than existing parking areas of Parking Lot 1 directly adjacent to the campuses' eastern property line. There are two driveways planned for the proposed underground parking structure. The distance from the rear of the 20th Street residential buildings to the nearest of the two driveways is approximately 95 feet. The distance from the rear of the 20th Street residential buildings to the second of the two driveways is approximately 140 feet. The portion of Parking Lot 1 that currently abuts the east property line would be retained as a temporary parking lot and drive isle that is consistent with the current configuration.

COMMENT 5.4

Residents in that area already have about 20,000 cars and 100 buses per day passing in front of their homes, and it seems unfair to also expose them to fumes and noise from the additional 2-3,000 daily car trips that would be generated behind their homes by the current proposal as it stands.

RESPONSE 5.4

As stated in Response to Comment 5.1 above, the new parking structure is not anticipated to generate a substantial increase in vehicle trips at this location. By increasing the capacity of the parking structure to include 500 spaces (a net increase of 323 parking spaces) many of the vehicle trips that are currently turned away from Parking Lot 1 will be able to park on-site. Currently, the surface parking lot located on the Project Site (Lot 1) experiences a high number of visitors, students, and staff turned away as a result of insufficient parking during peak demand. The Proposed Project would result in a net increase of 323 parking spaces on the SMC Main Campus which would accommodate the parking demands generated by faculty and students visiting the student services and administrative functions that will be provided in the new Student Services Replacement Building. Since the Proposed Project would result in a net decrease of classroom seats and asf on the SMC Main Campus, both of which are considered trip-generating components, the Proposed Project would not result in an increase of vehicle trips generated by the SMC Main Campus.

COMMENT 5.5

b. On Page IV-3, the document states that the proposed project would not generate any new vehicle trips to the campus. We don't understand the logic of that statement. If you add 323 parking spaces, based

on the SMC Bundy Campus Site Access and Circulation document and its traffic analysis, we think that 1,300-2,000 additional cars would be passing behind homes on 20th St. compared the current situation. That's more than the CMP guideline minimum of 50 per peak hour that requires analysis. We don't find any analyses of estimated daily car trips in this IS/MND document.

RESPONSE 5.5

As stated in Responses to Comments 5.1 and 5.5 above, the new parking structure is not anticipated to generate a substantial increase in vehicle trips at this location. Since the proposed project would result in a net decrease in classroom seats and asf, the Proposed Project would not increase vehicle trips to the SMC Campus. The increase in parking spaces at this location would accommodate the parking demands for faculty and students that are accessing the Student Services functions and visitors that are currently accessing Lot 1 to visit the information kiosk and are redirected to other lots on- or off-campus.

In addition, it should be noted that the County of Los Angeles Congestion Management Plan (CMP) Guidelines apply to designated public street segments, intersections or freeway on- and off-ramps. The CMP Guidelines do not apply to private roads or drive isles within a Community College Campus.

COMMENT 5.6

2. Aesthetics

a. Scenic vista – The document states on Page IV-11 that the increase in building height (60 feet) above grade) would not adversely affect the character of the surrounding uses or neighborhood. It refers to Drescher Hall, the Business Building, and Parking Structure C.

A more apt comparison would be the 3-story Science Building, which is located the same distance from homes on 20th St. as the administration portion of the new Student Services building would be. It looms over the one and two-story residential buildings on 20th St. closer to Pearl St. and is visible even from Pico Blvd.

To mitigate that impact, we propose that the 3-story administration portion of the new Student Services building be stepped back at least 140 feet from the lot line. (Residential parcels in that area are 140 feet deep.) This would push increased densities from the edge of the campus toward the center of the campus.

RESPONSE 5.6

Page IV-10 of the IS/MND provides analysis of the proposed Student Services Building on the basis that it would reach a maximum height of approximately 60 feet above grade. This height was identified as a maximum height limit applied uniformly to the proposed building's footprint to afford the greatest flexibility in designing the proposed structure and to conservatively estimate the worst case environmental impact. The current architectural design of the proposed Student Services building would be approximately 165 feet long along the north-south axis of the east façade with a two-story stepped

rooftop height of approximately 32 feet above grade and a partial third-floor rooftop height of approximately 48 feet. The mechanical equipment would likely be placed on the second-floor rooftop. The resulting average height for the proposed Student Services building would be approximately 45 feet.

Although the new structure would represent an increase in building height as compared to the existing buildings at this location, the overall height would not adversely affect the character of the surrounding uses or neighborhood. A comparison to the Science Building is not an accurate representation since the Science Building is approximately 410 feet long along the north-south axis of the east façade and has a fairly uniform building height of 60 feet above grade. In contrast to the Science Building, the scale and massing of the proposed Student Services building would represent a 40% reduction in building mass along the east-facing façade. Furthermore, the current design of the Student Services Replacement Building includes a two-story stepped rooftop height of approximately 32 feet above grade with a partial third-floor rooftop height of approximately 48 feet. The stepped roofline of the new structure and a building to building setback of over 95 feet from the nearest residential structures would further reduce the scale and massing of the new structure. The proposed Student Services building would therefore not be comparable to the Science Building.

COMMENT 5.7

b. Existing visual character of the site and its surroundings – The document mistakenly refers on Page IV-12 to "residential uses along 16th Street to the east." 16th St. is actually west of the campus. The problem with the proposal lies with visual elements of the project (the 3-story portion of the Student Services Building) that would be incompatible with nearby one- and two-story residential uses and apartments along 20th Street, immediately east of, and adjacent to, the campus.

We propose that the 3rd story portion of the Student Services Building be stepped back at least 140 feet from the lot line, equal to the depth of the residential properties along the west side of 20th St. to make it visually compatible with nearby residential buildings.

RESPONSE 5.7

The IS/MND has been corrected on page IV-12 with regard to the one and two-story single residential uses and apartments along 20th Street to the east of the Project Site. With regard to visual impacts and scale and massing, refer to Response to Comment 5.6, above.

With regard to the commenter's request to set back the new structure over 140 feet from the property line, it should be noted that the Proposed Project includes a building setback that is significantly larger than what is generally required for comparable projects under the Santa Monica Municipal Code (SMMC).

The roof top of the Science Building is approximately 52 feet above grade; however, mechanical equipment screening materials add an additional 8 feet to the height of the structure for a total height of approximately 60 feet above grade.

SMMC 9.04.08.18.060 (C3 property development standards) requires a minimum side yard setback for commercial buildings adjacent to a residential district. The setback from the property line is calculated by means of a formula that includes the number of stories and the parcel width. For a project equivalent to the proposed Student Services Replacement Building, the minimum required side yard setback would be less than 15 feet.

Additionally, SMMC 9.04.10.02.060 (Floor setbacks in commercial and industrial buildings) requires that, for commercial projects adjacent to an R2 District, the third floor be set back a minimum of ten feet from the required side yard setback. For a project equivalent to the proposed Student Services Replacement Building, the minimum side (east) required setback would be less than 25 feet for the third floor from the SMC Campus property line.

For the Proposed Project, the setback from the side of the proposed Student Services Replacement Building to the SMC property line is approximately 60 feet, or more than double what would be required under Santa Monica Municipal Code. And the existing alley provides an additional buffer. In total, the setback from the side of the proposed Student Services Replacement Building to the rear of the adjacent residential buildings would be approximately 95 feet. This is also more than double what would be required under Santa Monica Municipal Code. Therefore, the Proposed Project has been sited and designed to be respectful of the adjacent properties to the east, and scale and massing impacts would be less than significant.

COMMENT 5.8

c. Shadows – The "Winter and Summer Project Shadows" Figure IV-2 on Page IV- 15 of the document show that in winter, the proposed 60-foot tall 3-story Student Services Replacement Building will start casting shadows over the city alley east of the campus by 12 noon and, by 3 PM, four residential parcels on the west side of 20th St. (south of the gas station) will be completely covered by shadow. We can't tell from the document when, between noon and 3 PM, the shadows will begin to completely cover the residences.

We think this will have a significant impact on residents.

To mitigate this impact, we propose that the 3rd story portion of the new Student Services Replacement Building be stepped back by at least 140 feet from the lot line (the average depth of the residential parcels on 20th St.) to minimize shadows.

RESPONSE 5.8

For purposes of this analysis, a shade and shadow impact would be significant if the proposed Project creates substantial shade/shadows that affect shadow sensitive uses (e.g., residential uses or outdoor spaces associated with residential or recreational uses or existing solar panels) for more than 3 hours between 9:00 a.m. and 3:00 p.m. from late October to early April or for more than 4 hours between 9:00 a.m. and 5:00 p.m. from early April to late October. As shown in Figure IV-2, the project's winter project

shadows would not shade any portions of a residential structure until after the 12:00 p.m. hour. As such, the Proposed Project's shadows upon the residential structures along 20th Street would be less than 3 hours. Accordingly, shade and shadow impacts as a result of the Proposed Project would be less than significant. Since the proposed project would not result in any significant shade and shadow impacts upon any sensitive receptor, there is no need to mitigate the project's impact by increasing the setback. It should be noted, however, that the analysis presented in the IS/MND represents a worse-case impact with a uniform building height of 60 feet over the entire building footprint. The current design of the Student Services Replacement Building includes a two-story stepped rooftop height of approximately 32 feet above grade with a partial third-floor rooftop height of approximately 48 feet. The stepped roofline would further reduce the scale and massing of the new structure and would reduce the project's shadow patterns as presented in the IS/MND.

COMMENT 5.9

3. Noise – The document discusses noise impacts on Pages IV-36 onward and in appendix E. We're especially concerned about noise at Monitors 4 and 5, which are driveways/alleyways located close to residences. The appendix lists SEL levels (we assume these are "Single Event Levels" similar to the SNEL (sic) data that S.M. Airport monitors). We see SEL levels of 102 dBA and Peak levels of 108 dBA. Assuming that those correspond to SNEL (sic) levels, it should be noted that airplane pilots using S.M. Airport can be fined \$2,000, \$5,000, \$10,000 and ultimately banned from using the airport for noise levels over 95 dBA.

On Page IV-37, the document states that residential land uses in Santa Monica need to be mitigated to between 60 and 65 dBA CNEL (24-hour average).

Monitor 4 (alley ingress/egress near homes on 20th near Pico) already had averages of 58 dBA and maximum levels of 80 dBA.

Monitor 5 (campus driveway next to homes on the north side of Pearl just west of 20th) already had averages of 59 dBA and maximum levels of 76 dBA.

RESPONSE 5.9

The comment above references specific information and noise measurement data that was obtained in order to present the ambient noise conditions at the project location and vicinity. The "SEL" levels that are contained in Appendix E refer to the "Sound Exposure Level," which is defined as the total sound energy in a specific time period. While the SEL levels are included in the sound level meter logging report, SEL is generally reserved for aircraft noise and was not included as part of the noise analysis for this project. The "CNEL" or Community Noise Equivalent Level is defined as a rating of community noise exposure to all sources of sound that differentiates between daytime, evening and nighttime exposure levels. The levels for hourly periods from midnight to 7:00 a.m. have a 10 dBA penalty to represent a heightened sensitivity to noise levels during sleeping hours. The noise analysis for the

proposed project was based on " L_{eq} ," or Energy Equivalent Sound Level, which represents a weighted average of sound energy levels over a period of time.

The sound events surveyed in the IS/MND captured a weighted average $L_{\rm eq}$ over 15 minute intervals at seven different monitoring locations. The noise levels recorded at receptor locations 4 and 5 primarily capture noise levels generated by pedestrian and vehicle activities within Lot 1. Monitoring locations 4 and 5 are also influenced by noise levels generated by pedestrians and vehicles on Pico Boulevard and Pearl Street, respectively, and activities within the residential lots to the east of the SMC campus. Industry standards for evaluating noise levels from the equivalent noise sources indicate that a doubling of activity would be required to yield an increase of 3 dBA over the ambient noise levels. Based on this methodology, the proposed parking structure would need to double the level of traffic within the Parking Lot 1 drive isle and along Pearl Street and Pico Boulevard in order to result in a perceptible increase in noise levels. As the proposed parking structure would provide parking spaces for vehicles already entering Lot 1 and would not generate additional traffic, noise levels from the proposed project would not be increased by a perceptible level.

COMMENT 5.10

We are therefore concerned about noise impacts from increased campus-generated traffic on nearby homes. We ask that the city alleys near Monitor 4 and the driveway near Monitor 5 not be used for access to the new parking facility.

RESPONSE 5.10

The surface parking lot located on the Project Site (Lot 1) experiences a high number of visitors, students, and staff turned away as a result of insufficient parking during peak demand. The Proposed Project would help to accommodate this current demand, which would result in fewer cars returned to the adjacent neighborhood in search of parking.

The primary entrance and exit to Lot 1 is by means of a signalized driveway on Pico Boulevard midway between 18th Street and 19th Street. A secondary entrance and exit is by means of an eastern roadway on the SMC campus leading to Pearl Street on the south. An additional entrance and exit is by means of an east-west alleyway south of Pico connecting Lot 1 to 20th Street. There is also an additional exit at the northeast side of Lot 1 to eastbound Pico Boulevard.

The Proposed Project would maintain these existing entrances and exits in order to preserve the existing circulation, and to not introduce new vehicle-related impacts.

Additionally, as stated in Response To Comment 5.1, above, the Proposed Project would involve the replacement of a 177-space surface parking lot (Lot 1) with a 500-space subterranean parking garage.

² CALTRANS, <u>Technical Noise Supplement</u>, <u>A Technical Noise Supplement to the Traffic Noise Analysis Protocol</u>, October 1998.

This replacement would therefore remove 177 cars from the surface of the northeast corner of the Campus and would relocate these cars and the 323 proposed spaces into the subterranean garage, which would be further away from the nearby residences as compared to the current conditions. Motor vehicle noise generated by the Proposed Project would therefore not result in an increase of noise levels experienced by the residents to the east of the Project Site.

COMMENT 5.11

4. Transportation and Traffic – The document states on Page IV-44 that because the main campus will lose 178 classroom seats, there will be fewer vehicle trips to the Main Campus, even though 323 parking spaces will be added. This seems counterintuitive.

RESPONSE 5.11

Since the Proposed Project would result in a decrease of classroom seats and a reduction of asf on the SMC Main Campus, both of which are considered trip-generating components, the project would not result in an increase of vehicle trips generated by the SMC Main Campus. With respect to the increased parking capacity on the northeast corner of the Campus, the surface parking lot located on the Project Site currently experiences a high number of visitors, students, and staff turned away as a result of insufficient parking during peak demand. The increase in parking spaces at this location would accommodate the parking demands for faculty and students that are accessing the Student Services functions and visitors that are currently accessing Lot 1 to visit the information kiosk and then are redirected to other lots on- or off-campus.

COMMENT 5.12

Page IV-47 states that "ingress/egress from the alley on the east would be maintained."

The aerial photo in Figure II-2 on Page II-3, shows current ingress and egress from parking Lot 1 into a north/south city alley west of 20th and an east-west alley south of Pico. We think this is unacceptable with the current 177-space parking lot, and would be even more unacceptable with a 500-space underground parking structure. Cars passing through these alleys to get to and from the college are traveling within a few feet of people's homes, and they also cause safety concerns when they cross sidewalks used by students from John Adams Middle School and Rogers Elementary School. (Students from the Pico neighborhood use 20th St. to walk to and from school.)

RESPONSE 5.12

To clarify the access with regard to the alley on the east, the short east-west alleyway south of Pico Boulevard from 20th Street connects to a north-south alleyway (18th Street Court) that provides parking access for the residential units on 20th Street. The north-south alleyway (18th Street Court) that runs to the rear of the residential units on 20th Street is not an ingress or egress access route to the SMC Main Campus and does not accommodate any SMC traffic. The short east-west alleyway that connects to Lot 1

on the SMC Main Campus to 20th Street has done so for more than 50 years. As discussed above, and in numerous areas throughout the IS/MND, Parking Lot 1, the Project Site, and the SMC Main Campus as a whole, currently experience a high number of vehicles in search of parking spaces generated by the existing uses. The Proposed Project will not increase the demand for additional parking spaces, but would include a net increase of 323 parking spaces to help accommodate the existing parking demand and to relieve the current parking deficiency on the Campus. It is anticipated that the vehicle access, site circulation, and pedestrian safety on the Project Site and the SMC Campus will be improved as a result of the Proposed Project.

COMMENT 5.13

We are concerned about the new parking facility's entrance/exit close proximity to the ingress/egress from these city alleys just south of Pico and just west of 20th St. The document states that "the ingress driveway from the alley would not allow for direct access to the subterranean garage, and would primarily be used for access for short term parking provided at grade along the east side of the Project Side," but it says nothing as to whether cars exiting the subterranean garage could leaving into the city alleys. Even with the current 177 surface parking spaces, traffic at certain times of the day on 20th St. becomes dangerous as students-in-a-hurry drive into and out of alleys south of Pico, and across 20th through heavy commuter traffic, trying to access parking. We don't think that city alleys next to homes are appropriate access points for campus parking facilities (which will probably generate 2,000-3,000 daily car trips).

RESPONSE 5.13

The Proposed Project would not include the removal or addition of any Campus driveways or access points. After project completion, vehicles exiting the subterranean parking garage driveway facing the east will be able to use the following exit routes: head north through Lot 1 and exit to Pico Boulevard at the stop light located between 18th Street and 19th Street, head north through Lot 1 and exit to Pico Boulevard at the egress only driveway, head north and east to exit through the east-west alley from Lot 1 to 20th Street, and, head south through Lot 1 and the Campus roadway to exit onto Pearl Street. It is anticipated that these four exit options will be more than sufficient to serve the proposed subterranean parking garage.

SMC employs a highly trained and certified Police Department and works cooperatively with the Santa Monica Police Department and with the public safety officers and volunteers of the Santa Monica-Malibu Unified School District to assure the safety of all pedestrians, including school children, on and near all SMC campus sites. SMC is not aware of any unusual incidents related to the use of the short alleyway.

Therefore, based on increased parking supply and an overall improved site design for the northeast corner of the Campus, it is anticipated that the vehicle access, site circulation, and pedestrian safety on the Project Site and the SMC Campus will be improved as a result of the Proposed Project.

COMMENT 5.14

We are also concerned about increased use of the campus driveway ingress/egress on the north side of Pearl St. just west of 20th St. due to the 323 additional parking spaces it will serve. Pearl St. is residential immediately east of that driveway, and there is a middle school a few hundred feet west of the driveway. We think that the safest campus entrance/exit points should be on major arterials, such as Pico Blvd., not on residential streets such as Pearl St., near schools and homes.

RESPONSE 5.14

The additional parking spaces provided by the subterranean parking garage would not result in a substantial increase in vehicle trips to Lot 1. The proposed project would not alter the existing circulation patterns and access points to the SMC campus and therefore would not generate any new impacts with respect to entrance and exit points to the campus.

COMMENT 5.15

5. Neighborhood Effects – The document states on Page IV-52 that the height of the proposed Student Services Replacement Building would be comparable to other Campus and neighborhood structures in the area. We disagree. The building will be close to residential properties on the west side of 20th St., and there are no other 3-story buildings on the west side of 20th St. between Pico Blvd. and Pearl St. Lots on Pearl St. are approximately 140 x 50, and we think that the 3-story portion of the Student Services building should be stepped back by at least 140 feet from the lot line to make it more comparable with one- and two-story neighborhood structures.

RESPONSE 5.15

With respect to neighborhood effects associated with scale and massing and building setbacks of the new Student Services Replacement Building, see Responses to Comments 5.7 and 5.8, above.

COMMENT 5.16

6. Construction impacts – Page IV-53 of the document states that construction worker vehicles and equipment would be parked or staged on the northeast corner of the Project Site, with parking expanding further south into Lot 1 (behind residences) during construction of the subterranean parking garage. Friends of Sunset Park will be monitoring the situation to see that city ordinances regarding construction hours, noise, and dust are followed. (We still remember the mountain of dirt that was left on the empty lot at Pico and 14th, next to WISE and the YWCA, with winds picking up clouds of dust until FOSP Board members appealed to President Tsang to have it removed.)

RESPONSE 5.16

This comment restates the content in the IS/MND regarding construction worker parking and equipment staging. This comment does not state a specific concern with regard to the adequacy of the analysis

presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 5.17

7. Landscape Maintenance – We are concerning that the new landscaping may not bring with it funding for adequate maintenance (given the current state of landscaping on the Pico side of the campus). We hope that the college will designate adequate funding to maintain the new landscaping included in the project.

RESPONSE 5.17

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 5.18

Summary

Friends of Sunset Park recommends the following:

1. Regarding the 3-story Student Services Replacement Building, design a stepback from 2 to 3 stories on the east side of the building, so that the 3rd story would start at least 140 feet from the lot line. This would make the height more consistent with the neighborhood, provide a buffer equal to the length of the residential lots (ca. 140 feet deep), and push density toward the middle of the campus.

RESPONSE 5.18

See Responses to Comments 5.6 through 5.8, above.

COMMENT 5.19

2. Move the entrance/exit for the 500-space underground parking facility from the east side of the Student Services Replacing Building (near residents) to the west side of the building.

RESPONSE 5.19

This comment is noted for the record and will be forwarded to the decision makers for their consideration. See Response To Comment 5.3, above.

COMMENT 5.20

3. Do not allow access to the new parking facility or surface parking a) from city alleys near 20th and Pico or b) from the driveway on Pearl St. in order to protect pedestrians, especially school children, and to avoid noise and air quality impacts on nearby residents.

RESPONSE 5.20

This comment is noted for the record and will be forwarded to the decision makers for their consideration. See Responses To Comments 5.1, 5.9, 5.10, and 5.12 through 5.14, above.

COMMENT 5.21

4. Designate funding not only for appropriate landscape design for the new project, but also for adequate maintenance of new landscaping on the Pico side of the campus.

RESPONSE 5.21

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT LETTER NO. 6

Board of Directors

Friends of Sunset Park

ZinaJosephs@aol.com

January 9, 2008

COMMENT 6.1

Thank you for scheduling an additional community presentation on January 9th. Also, thank you for mailing an announcement of the meeting to residents and for including the URL for the relevant documents, albeit in 8-point font. What was not included in the mailer, unfortunately, was any indication of the proximity of the Student Services replacement building to people's homes, the fact that it will be 3 stories tall, or the fact that the sole entrance/exit to the underground 500-space parking facility will be directly behind multi-family residences.

RESPONSE 6.1

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 6.2

In looking over the materials which Don Girard brought to us, the FOSP Board has the following suggestions (which we will also mail to Randy Lawson):

1. Regarding the 3-story Student Services replacement building, which will be located near Pico Blvd. (as close to 20th St. residential properties as the science building further south on the campus is -- looming over backyards), we urge you to design a stepback from 2 to 3 stories on the east side of the building, so the 3rd story would start 135 feet from the lot line. This would make the height on the east end of the building more consistent with the neighborhood, provide a buffer equal to the length of the residential lots (ca. 135 feet), and push density toward the middle of the campus rather than the edges.

RESPONSE 6.2

With respect to building stepback, height, and visual impact and compatibility, please refer to Responses to Comments 5.3, and 5.6 through 5.8, above.

COMMENT 6.3

Don Girard was kind enough to give the FOSP Board a walking tour of the Main Campus some years ago, and it included the new science building. The building seems to be well-designed for science instruction, but it's as close to residential properties as the new Student Services building will be, and it looms over homes on the west side of 20th St.

RESPONSE 6.3

With respect to visual impacts and compatibility, please refer to Responses to Comments 5.6 through 5.8, above.

COMMENT 6.4

2. We also urge you to move the entrance/exit for the 500-space underground parking facility from the east side of the Student Services building (near residents) to the west side of the building. Residents on 20th St. already have about 20,000 cars and 100 Big Blue Buses per day passing in front of their homes. It seems unfair to make them endure the noise and fumes from another 2-3,000 cars passing daily behind their homes as well.

RESPONSE 6.4

With respect to the driveway location for the proposed subterranean parking garage, please refer to Response To Comment 5.3, above. With respect to potential noise and air quality impacts, please refer to Responses To Comments 5.1, 5.4, 5.9. and 5.10.

COMMENT 6.5

3. Finally, we urge you to designate sufficient funding not only for appropriate landscape design for the new project, but also for adequate maintenance of landscaping on the Pico side of the campus. Except for the grassy bank along the parking lot in front of the Concert Hall, the Pico-side landscaping currently seems to consist of scattered bushes, bare dirt, and trash.

RESPONSE 6.5

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 6.6

We're very pleased to see the plan for a bus pull-out on Pico Blvd., and we hope that some of the college shuttle buses (the SMC Commuter and the Sunset Ride, for example) can perhaps also use that bus stop so they don't need to cut through the narrow residential streets near the college.

RESPONSE 6.6

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT LETTER NO. 7

Jeanne Laurie
Sunset Park resident
2621 Centinela Avenue, No. 11
Santa Monica, CA 90405
January 8, 2008

COMMENT 7.1

Per a communication from Zina Josephs of Friends of Sunset Park:

The project will involve demolishing the Concert Hall, amphitheatre, and automotive facilities, and constructing a new 3-story Student Services building (admissions, enrollment, counseling, etc.) with 3 levels of parking underneath, remodeling Drescher Hall to include the bookstore on the 1St floor, creating a passenger drop-off area, and adding a landscaped "entry plaza" on the Pico side of the campus. Real-time electronic parking availability signs will be installed along Pico Blvd., and the Big Blue Bus will

consolidate two bus stops along Pico and create a bus pull-out, so that buses will not block a traffic lane on Pico when they stop to let off or pick up students.

RESPONSE 7.1

This comment restates the project characteristics and goals. This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 7.2

The FOSP Board is concerned about 3 things:

a) that the 3-story Student Services building will loom over 1 and 2-story residences on the west side of 20th St. just south of Pico, just as the new science building looms over homes on 20th closer to Pearl St.

RESPONSE 7.2

With respect to visual impacts and compatibility, please refer to Responses To Comments 5.6 through 5.8, above.

COMMENT 7.3

b) that the entrance/exit to the 500-space 3-level underground parking on the east side of the Student Services building will bring the noise and fume of 2-3,000 daily car trips right behind those same residences (which already have 20,000 cars and 100 buses passing by the front of their homes daily), and

RESPONSE 7.3

With respect to the driveway location for the proposed subterranean parking garage, please refer to Response to Comment 5.3, above. With respect to potential noise and air quality impacts, please refer to Responses to Comments 5.1, 5.4, 5.9. and 5.10.

COMMENT 7.4

c) that the new landscaping may not bring with it funding for adequate maintenance (given the current state of landscaping on the Pico side of the campus).

RESPONSE 7.4

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 7.5

Given those concerns, we're making the following recommendations:

1. Re the 3-story Student Services building, design a stepback from 2 to 3 stories on the east side of the building, so that the 3rd story would start 135 feet from the lot line. This would make the height more consistent with the neighborhood, provide a buffer equal to the length of the residential lots (ca. 135 feet deep), and push density toward the middle of the campus.

RESPONSE 7.5

This comment is noted for the record and will be forwarded to the decision makers for their consideration. With respect to building stepback, height, and visual impact and compatibility, please refer to Responses to Comments 5.3, and 5.6 through 5.8.

COMMENT 7.6

2. Move the entrance/exit for the 500-space underground parking from the east side of the building (near residents) to the west side of the building.

RESPONSE 7.6

This comment is noted for the record and will be forwarded to the decision makers for their consideration. With respect to the driveway location for the proposed subterranean parking garage, please refer to Response To Comment 5.3, above.

COMMENT 7.7

3. Designate funding not only for appropriate landscape design for the new project, but also for adequate maintenance of landscaping on the Pico side of the campus.

RESPONSE 7.7

This comment is noted for the record and will be forwarded to the decision makers for their consideration. No further response is required.

COMMENT 7.8

I can't improve on the language from Zina Josephs. The recommendations are reasonable and prudent. At this point, the changes would not be difficult to make. It would go a long way to improve relationships in the community to accept FOSP's recommendations.

I encourage you to act favorably on the recommendations.

Sincerely,

Jeanne Laurie Sunset Park resident

RESPONSE 7.8

This comment does not state a specific concern with regard to the adequacy of the analysis presented in the IS/MND for the Proposed Project. Nonetheless, this comment will be forwarded to the decision makers for their consideration. No further response is required.