

5. Environmental Analysis

5.1 AESTHETICS

This section of the Draft Environmental Impact Report (DEIR) evaluates the McKinley Elementary School Campus Master Plan Project's (Proposed Project) potential impacts on aesthetic and visual resources related to visual character, visual quality, and new sources of light and glare.

The analysis in this section is based in part on the existing conditions of the current McKinley Elementary School campus and architectural renderings prepared for the Proposed Project.

A California Environmental Quality Act (CEQA) scoping meeting was conducted on January 31, 2023, where verbal comments were received in response to the Initial Study/Notice of Preparation (IS/NOP) regarding the potential visual impacts that would result from the Proposed Project. In addition, written comments were received regarding the potential impacts to community character in areas surrounding the McKinley Elementary School (McKinley ES) campus. These comments are considered in this section. The IS/NOP and all scoping comment letters are included as Appendices B and C of this document.

5.1.1 Environmental Setting

5.1.1.1 REGULATORY BACKGROUND

State and local laws, regulations, plans, or guidelines related to aesthetics that are applicable to the Proposed Project are summarized in this section.

State

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 and most recently revised in 2018 (Title 24, Part 6, of the California Code of Regulations). The newly revised standards took effect on January 1, 2020. Title 24 requires the design of building shells and building components to conserve energy. It also requires outdoor lighting controls to reduce energy usage; in effect, this reduces outdoor lighting.

Local

City of Santa Monica Municipal Code

The City of Santa Monica Municipal Code (SMMC) establishes land use regulations and standards for development in the City, including specific design guidelines, height limits, building density, building design and landscaping standards, architectural features, and open space and setback requirements.

Section 4.12.110. Restrictions on demolition, excavation, grading, spray painting, construction, maintenance or repair of buildings.

- a. No person shall engage in any construction activity during the following times anywhere in the City:

5. Environmental Analysis

AESTHETICS

1. Before eight a.m. or after six p.m. on Monday through Friday, except that construction activities conducted by employees of the City of Santa Monica or public utilities while conducting duties associated with their employment shall not occur before seven a.m. or after six p.m. on Monday through Friday;
 2. Before nine a.m. or after five p.m. on Saturday;
 3. All day on Sunday;
 4. All day on New Year's Day, Martin Luther King's Birthday, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, as those days have been established by the United States of America.
- b. Except as set forth in subsection (d) of this Section, the noise created by construction activity shall not cause:
1. The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of this Chapter, for the noise zone where the measurement is taken, plus twenty dBA; or
 2. A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of this Chapter for the noise zone where the measurement is taken plus forty dBA, for any period of time.
- c. Prior to the issuance of a building permit, all development projects located within five hundred feet of any residential development or other noise sensitive land uses must submit a list of equipment and activities required during construction. In particular, this list shall include the following:
1. Construction equipment to be used, such as pile drivers, jackhammers, pavement breakers or similar equipment;
 2. Construction activities such as twenty-four hour pumping, excavation or demolition;
 3. A list of measures that will be implemented to minimize noise impacts on nearby residential uses;
- d. Any construction that exceeds the noise levels established in subsection (b) of this Section shall occur between the hours of ten a.m. and three p.m., Monday through Friday.
- e. A permit may be issued authorizing construction activity during the times prohibited by this Section whenever it is found to be in the public interest. The person obtaining the permit shall provide notification to persons occupying property within a perimeter of five hundred feet of the site of the proposed construction activity prior to commencing work pursuant to the permit. The form of the notification shall be approved by the City and contain procedures for the submission of comments prior to the approval of the permit. Applications for such permit shall be in writing, shall be accompanied by an application fee and shall set forth in detail facts showing that the public interest will be served by the issuance of such permit. Applications shall be made to the Building Officer. No permit shall be issued unless the application is first

5. Environmental Analysis AESTHETICS

approved by the Director of Environmental and Public Works Management, the Building Officer, the Chief of Police and the Director of Planning and Community Development. The City Council shall establish by resolution fees for the filing and processing of the application required by this subsection (e) and any required compliance monitoring. This fee may be revised from time to time by resolution of the City Council.

Chapter 9.15 Public and Semi-Public Districts

PL Institutional/Public Lands. This Zoning District is for public or semi-public facilities, including municipal offices, schools, libraries, museums, or performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This District is consistent with the LUCE's Institutional/Public Lands land use designation. Table 9.15.030, *Development Standards – Public and Park Districts*, stipulates the development standards for the Public and Semi-Public Districts.

Table 9.15.030 Development Standards – Public and Park Districts

Standard	PL (Institution/Public Lands)
Parcel Intensity Standards	
Minimum Parcel Size	20,000 square feet
Building Form and Location	
Maximum Building Stories	2
Maximum Building Height	32 feet
Minimum Setbacks (feet, measures from property line)	
Street Frontage	10 feet
Interior Side and Rear	10 feet; 15 feet when abutting a residential district
Maximum Parcel Coverage (% of a parcel)	N/A

Section 9.21.080, Lighting

Section 9.21.080(A): Applicability

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

Section 9.21.080(C): General Standards

- b. **Nonresidential Buildings.** All exterior doors, during the hours of darkness, shall be illuminated with a minimum of one foot-candle of light.
- c. **Shielding.** All lighting fixtures shall be shielded so as not to produce obtrusive glare onto the public right-of-way or adjacent properties. All luminaries shall meet the most recently adopted criteria of the

5. Environmental Analysis

AESTHETICS

Illuminating Engineering Society of North America (IESNA) for “Cut Off” or “Full Cut Off” luminaries.

- d. **Light Trespass.** Lighting may not illuminate other properties in excess of a measurement of 0.5 foot candles of light.
- e. **Maximum Height.** The maximum height for exterior lighting shall be as follows:
 - a. Residential, Ocean Park Oceanfront Districts: 16 feet.
 - b. Nonresidential Districts: 26 feet.

Section 9.21.080(F): Parking Lot and Structure Lighting

- 1. Public parking areas designed to accommodate 10 or more vehicles shall be provided with a minimum of 0.5 foot-candle and a maximum of 3.0 foot candles of light over of the parking surface from 0.5-hour before dusk until 0.5-hour after dawn.
- 2. Lighting design shall be coordinated with the landscape plan to ensure that vegetation growth will not substantially impair the intended illumination.
- 3. All lighting used to illuminate a parking area for any number of automobiles in any District shall be arranged so that all direct rays from such lighting fall entirely within such parking lot and be consistent with this Section.

Section 9.21.120, Reflective Materials

No more than 25 percent of the surface area of any façade on any new building contain black or mirrored glass or other mirror-like material that is highly reflective, and that materials for roofing be of a non-reflective nature.

City of Santa Monica General Plan

Land Use and Circulation Element

The City of Santa Monica Land Use and Circulation Element (LUCE) was adopted July 6, 2010, and revised July 24, 2015. The LUCE establishes the City’s land use, urban design, and transportation vision. The following goals and policies related to scenic quality and aesthetics are applicable to the entire city and relevant to the Proposed Project (City of Santa Monica 2015).

General: Citywide Scenic Quality/Design Goals and Policies

- **Policy LU1.4.** Retention of Existing Structures. Encourage and incentivize preservation of historic structures and older buildings that add to the character of residential districts through the development of programs such as Transfer of Development Rights (TDR) and conservation easements.

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

5. Environmental Analysis

AESTHETICS

- **Policy LU12.2. Preservation Programs.** Preserve and protect historic resources through the development of preservation programs and economic incentives such as Transfer of Development Rights and conservation easements as well as neighborhood conservation approaches.
- **Policy LU12.3. Rehabilitation of Historic Resources.** Promote adaptive reuse of historic structures and sensitive alterations where changes are proposed. New construction or additions to historic structures shall be respectful of the existing historic resource.

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

- **Policy LU13.1. Maintain Character.** Reinforce the City's distinctive natural, social, and environmental characteristics including its beachfront and connections to the water, civic and cultural institutions, terrain and climate, and the geographic fabric of neighborhoods and boulevards.
- **Policy LU13.3. Districts and Boulevards.** Support the City's diverse districts and boulevards and develop urban design principles, guidelines and standards tailored to each area that respect, reinforce and enhance the defining form and character of that area.

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

- **Policy LU15.8. Building Articulation.** Building façades should be well designed with appropriate articulation in the form of setbacks, offsets, projections and a mix of architectural materials and elements to establish an aesthetically pleasing pattern. Large areas of glass above the ground floor require special design consideration. Highly reflective materials are to be avoided, and dark or reflective glass is prohibited.
- **Policy LU15.10. Roofline Variation.** Buildings should be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front. To achieve this goal, development standards should provide flexibility to encourage buildings with interesting silhouettes and skylines, and the primary building façade shall not be lower than the designated minimum street façade height.

Neighborhoods: Citywide Goals and Policies

Goal N1: Protect, preserve and enhance the residential neighborhoods.

- **Policy N1.7.** Make new development projects of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes, including ground level open spaces and appropriate building setbacks and upper-floor step backs along neighborhood streets.

Goal N4: Ensure compatible design to preserve and enhance neighborhoods.

5. Environmental Analysis

AESTHETICS

- **Policy N4.1.** Design new development to be compatible with the existing scale, mass and character of the residential neighborhood. New buildings should transition in size, height and scale toward adjacent residential structures.
- **Policy N4.4.** Design new development or redeveloped structures in such a manner as to minimize impacts on or disruptions to neighbors.
- **Policy N4.5.** Ensure that new development or redevelopment of existing properties respects the neighborhood history and culture.
- **Policy N4.6.** Incorporate sustainable building practices, and encourage redevelopment to consider adaptive reuse as an alternative to demolition.

Mid-City Neighborhood

McKinley ES is in the Mid-City neighborhood of Santa Monica. The following goals and policies related to scenic quality and aesthetics are specific to the Mid-City neighborhood and applicable to the Proposed Project (City of Santa Monica 2015).

Goal N23: Protect, preserve and enhance the Mid-City residential neighborhood and ensure compatible design.

Historic Preservation

The following goals and policies related to scenic quality and aesthetics, are specific to historical resources within the City of Santa Monica and applicable to the Proposed Project (City of Santa Monica 2015).

Goal HP1: Preserve and protect historic resources in Santa Monica through the land use decision-making process.

- **Policy HP1.3.** Ensure that new development, alterations or remodeling on, or adjacent to, historic properties are sensitive to historic resources and are compatible with the surrounding historic context.
- **Policy HP1.7.** Develop tools to address the conservation of unique and valued character-defining features in residential neighborhoods to preserve and enhance the existing architecture, scale, landscape and context.

5.1.1.2 EXISTING CONDITIONS

Mid-City Neighborhood

The Proposed Project's Site is in Mid-City, which is geographically in the center of Santa Monica, generally bounded by Washington Avenue to the north, Centinela Avenue to the east, Colorado Avenue and Santa Monica Boulevard to the south, and 5th Street to the west. The area to the east of the Mid-City neighborhood connects central Santa Monica to the West Los Angeles area, and the area to the west is a dense urban area characterized by its wide variety of architectural styles.

5. Environmental Analysis

AESTHETICS

Visual Character

City of Santa Monica

The City of Santa Monica offers unique natural and man-made visual resources that are visible to those walking, cycling, or driving through the city. These resources include places such as the beachfront, historic areas, tree-lined neighborhoods, and commercial districts such as the Third Street Promenade. The major natural resources unique to the city are the Santa Monica Bay, including the beachfront and coastal area as well as the natural Palisades bluffs that overlook the coastline. The city contains various historic buildings and designs, representing a range of time periods, architectural styles, and urban character (Santa Monica 2010).

Neighborhood Character

The Mid-City neighborhood is composed of two subareas—Mid-City East, which is generally bounded by Wilshire Boulevard to the north, Centinela Avenue to the east, Colorado Boulevard to the south, and 25th Street to the west (including two small residential blocks of Berkeley and Franklin Streets), and Central City, which occupies land in the core of Santa Monica, including the Proposed Project's Site. The residential component of the Mid-City neighborhood is primarily made up of multifamily residential properties as well as several single-family homes representing a range of architectural styles.

The Mid-City neighborhood is intersected by three major boulevards (Broadway, Santa Monica Boulevard, and Wilshire Boulevard). A significant feature of Mid-City is Santa Monica's medical industry, including the Santa Monica-UCLA Medical Center and Providence Saint John's Health Center to the west of the Proposed Project's Site across 23rd Court. The McKinley ES campus is a dominant visible feature of the Mid-City neighborhood.

McKinley Elementary School Campus

The campus was built in 1922 at its current location. It fronts Santa Monica Boulevard and is a visually prominent feature of the area, conveying a unique and dominant visual appearance. The campus includes four buildings, identified as Buildings A through D; 11 portable classrooms and 2 modular classrooms; a recreational portable, fields, and playgrounds; a student garden; and a parking lot along Chelsea Avenue (see Figure 3-4, *Existing Site Plan*). As shown in Table 5.1-1, *Characteristics of Existing Buildings*, the permanent buildings on the campus were constructed between 1923 and 1973 in Italian Renaissance Revival and Mid-Century Modern styles of architecture (see Section 5.3, *Cultural Resources*, for more information about these architectural styles). All of these campus elements are visible to varying degrees from surrounding residents and passing vehicles and pedestrians.

5. Environmental Analysis

AESTHETICS

Table 5.1-1 Characteristics of Existing Buildings

Building Name	Year Built	Current Use	Building Type	Building Height	Architectural Style
A	1951	Multipurpose Cafeteria	Permanent	23 ft-8 in	Mid-Century Modern
B	1923	Classrooms	Permanent	41 ft-4 in	Italian Renaissance Revival
C	1923	Administration/Classrooms/Multipurpose Auditorium	Permanent	38 ft-6 in	Italian Renaissance Revival
D	1973	Preschool Classrooms	Modular	11 ft-9 in	Mid-Century Modern
B1-B3	Unknown	Classrooms	Portable	12 ft	N/A
B4-B9	Unknown	Classrooms	Portable	12 ft	N/A
B10-B11	Unknown	Classrooms	Portable	12 ft	N/A

Source: Historic Resources Group 2022.

The following sections include an architectural description of each building and their visual prominence (see Figures 3-4 and 3-5, *Photographs of the Existing Campus*).

Building A (Cafeteria)

Building A was constructed in 1951 and is visible from 23rd Court in the southwestern part of the campus. It is a one-story, 4,439-square-foot permanent building, with a height of 23 feet 8 inches, which is generally rectangular and contains the school's cafeteria. It is covered in smooth stucco and capped by a flat roof. The building is composed of two volumes; the southern volume is slightly larger than the northern. Entrances display single and double metal slab doors, and concrete ramps provide access to the building. Solar panels are on the roof of the building. Building A is connected to Building C via the building's arcade, which extends from the eastern corner to create the West Courtyard.

Building B (Classrooms)

Building B was constructed in 1923 in the central portion of the campus immediately north of Building C. It is visible from Arizona Avenue. The two-story, 13,425-square-foot permanent building contains classrooms, with a height of 41 feet 4 inches. Building B has a generally rectangular footprint and is covered in smooth stucco and capped by a gable roof clad in red clay tiles. Entrances display metal slab doors with rectangular lights. Two concrete ramps provide entrance to the first story's south elevation. An elevator and connected arcade at the northwest corner of the building provide access to the second story. A metal staircase allows emergency exit from the second story along the north elevation. Additional features include metal wall vents and wall-mounted lights.

Building C (Administration/Classrooms/Multipurpose Auditorium)

Building C was constructed in 1923 and is in the southern part of the campus immediately south of Building B. It is the primary building visible from Santa Monica Boulevard. Building C consists of a central, two-story,

5. Environmental Analysis

AESTHETICS

27,390-square-foot permanent building, with a height of 38 feet 6 inches, flanked on each end by single-story wings. Building C has an irregular footprint composed of a central, 2-story building flanked on both ends by single-story wings. The central volume and four wings all have gable roofs clad in red clay tiles with evenly placed gable-roofed vented dormers. The building has a smooth stucco exterior. Although most windows are rectangular, many are set in the original arched openings. Entrances display single and double metal slab doors with rectangular lights.

The primary (south) façade retains the original main entrance set in the front-gabled bay. This original 1923 entrance features a low-relief entablature depicting a central blind arch flanked by circular terracotta medallions. The north elevation features a central volume flanked by the two flat-roofed additions. A tapered chimney with metal cap projects from the roof along this elevation. Additional features include metal wall vents and wall-mounted lights.

Building D (Preschool)

Building D was constructed in 1973 and is in the eastern part of the campus just east of Building C, and is primarily visible from Chelsea Avenue. Building D is a rectangular, one-story, 3,796-square-foot modular building, with a height of 11 feet 9 inches. It is covered in textured stucco and is capped by a flat roof with metal eaves. Entrances display single and double metal slab doors. A wrap-around canopy provides shelter along the south and west elevations. Upheld by thin square metal columns, the porch has deep, overhanging eaves with an underside characterized by evenly placed metal beams that resemble recessed paneling or coffers. The slightly raised concrete platform is accessible via a ramp. Additional features include louvered metal wall vents, and roof- and wall-mounted lights.

Santa Monica Boulevard Quad

Situated south of Building C, the Santa Monica Boulevard Quad was constructed in 1923. The open space is traversed by several concrete walkways that historically provided pedestrian access to the original entrance on Santa Monica Boulevard. The setback is generally consistent and is landscaped with grassy lawns and mature trees of various species that are directly visible from Santa Monica Boulevard.

Main Courtyard

The Main Courtyard was constructed in 1923 and is surrounded by Building B to the north and Building C to the east, south, and west. The courtyard is landscaped with grassy lawns, mature trees, and concrete patios interspersed with lunch tables, lampposts, and trash receptacles. The “Storybook Land” sculpture is in the center of the courtyard on a tiered pedestal clad in tile. The Main Courtyard and its features are interior to the campus and are generally not visible to off-site viewers.

West Courtyard

The courtyard was constructed in 1951 and is paved and includes picnic tables; it is bordered by Building C to the east and south and by Building A to the west.

5. Environmental Analysis

AESTHETICS

Views of the Proposed Project's Site from Public Locations

Public viewing points, identified in Figure 5.1-1, *Key Public Viewpoint Locations*, were chosen as a representative sample of views of the Proposed Project's Site from surrounding public roads. Views from private residences are not protected views under CEQA or the Coastal Act and are not described here. The views from each of these public viewing points are described here and captured in Figures 5.1-2a, *Existing Public Viewing Point 1*, through Figure 5.1-4a, *Existing Public Viewing Point 3*. These views were selected based on the Proposed Project's Site location on the campus, public comments received during the scoping process, and consideration of the goals and policies in the City's General Plan.

Public Viewing Point 1: Arizona Avenue and Chelsea Avenue

Figure 5.1-2a depicts the existing viewshed from the intersection of Arizona and Chelsea Avenues, looking south toward the McKinley ES campus. As shown in Figure 5.1-2a, the Proposed Project's Site is bordered by a chain-link fence and the public rights-of-way, which include above-ground power lines; ornamental street trees, including mature Ficus trees (*Ficus sp.*); and bare planter areas with limited ruderal vegetation (i.e., weeds). Street parking is provided along Arizona and Chelsea Avenues.

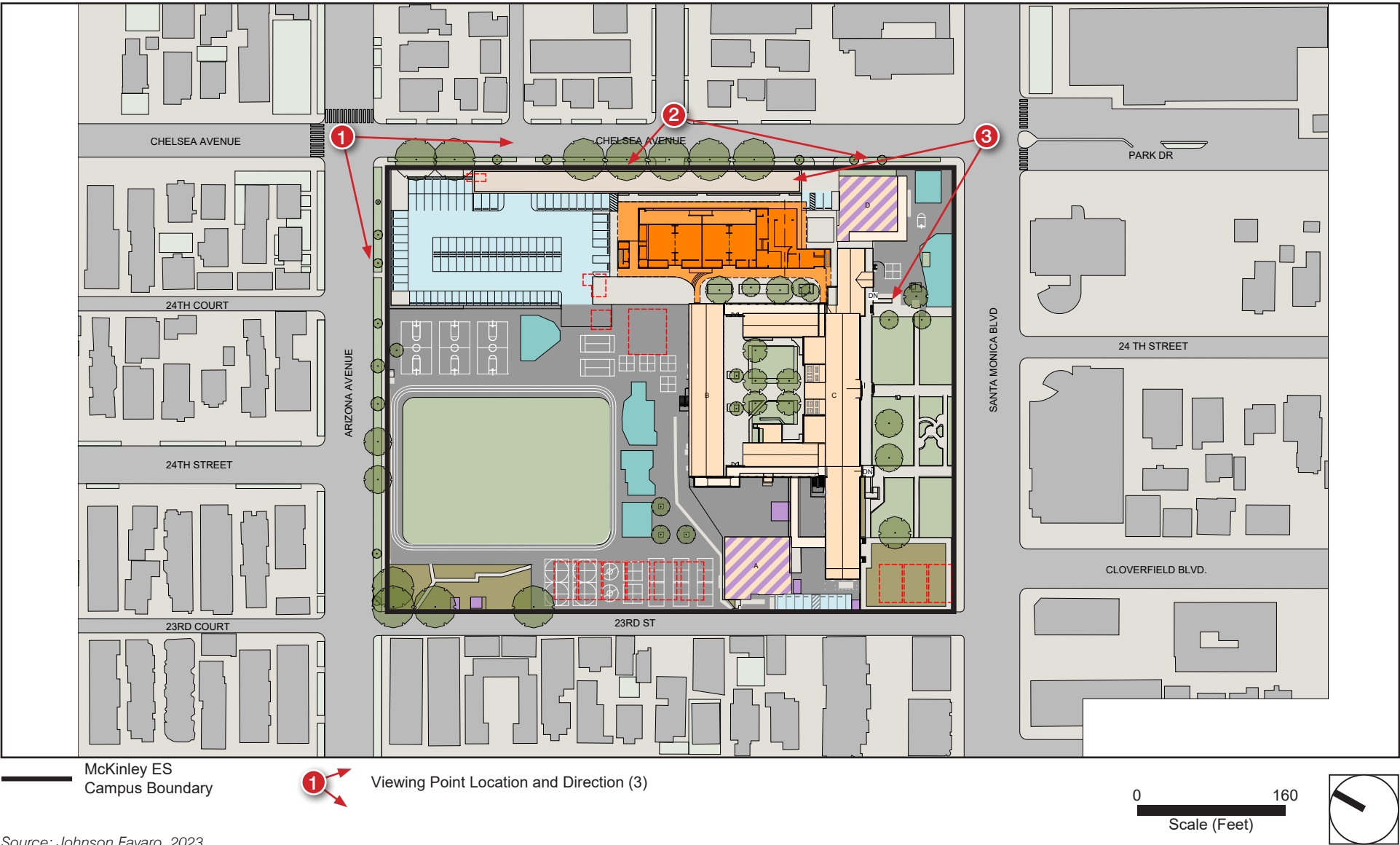
From this intersection, immediate views of the campus include the asphalt play area with painted handball courts and basketball hoops with backstops, and the campus surface parking lot. The two-story building B and the roofline of Building C are visible. Additionally, the four-story Providence Saint John's Health Center is visible in the background to the southwest.

Public Viewing Point 2: Chelsea Avenue

Figure 5.1-3a, *Existing Public Viewing Point 2*, depicts the existing viewshed from the mid-point along Chelsea Avenue between Santa Monica Boulevard and Arizona Avenue, looking southwest at the eastern portion of the McKinley ES campus. As shown in Figure 5.1-3a, the Proposed Project's Site is bordered by a chain-link fence and the public right-of-way, which includes above-ground power lines, ornamental street trees (*Ficus sp.*), and bare planter areas with ruderal vegetation. Street parking is provided along Chelsea Avenue. An ingress driveway and separate egress driveway along Chelsea Avenue provide vehicle access to the associated surface parking lot, which is visible from this viewpoint.

From this viewpoint, immediate views of the campus include the children's asphalt play area to the north, the two-story Building B, the existing loggia part of Building C, the campus surface parking lot, and the modular Building D to the south. A more prominent view of the multistory Providence Saint John's Health Center is visible in the background.

Figure 5.1-1 - Key Public Viewing Point Locations



Source: Johnson Favaro, 2023.

5. Environmental Analysis

AESTHETICS

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Figure 5.1-2a - Existing Public Viewing Point 1



5. Environmental Analysis

AESTHETICS

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Figure 5.1-3a - Existing Public Viewing Point 2



5. Environmental Analysis

AESTHETICS

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Figure 5.1-4a - Existing Public Viewing Point 3



5. Environmental Analysis

AESTHETICS

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5. Environmental Analysis AESTHETICS

Public Viewing Point 3: Santa Monica Boulevard and Chelsea Avenue

Figure 5.1-4a depicts the existing viewshed from the intersection of Santa Monica Boulevard and Chelsea Avenue looking west at the southeastern portion of the McKinley ES campus. As shown in Figure 5.1-4a, the Proposed Project's Site is bordered by a chain-link fence, generally along the portion of the campus fronting Santa Monica Boulevard, and the public rights-of-way, which include above-ground power lines, ornamental street trees (*Podocarpus sp.*), and planter areas with shrubs (*Bougainvillea sp.*) and ruderal vegetation. Street parking is provided along Arizona and Chelsea Avenues.

From this intersection, immediate views of the campus include a children's playground area and the one-story modular Building D in the foreground. The campus surface parking lot to the north and the two-story Building C to the west are visible in the midground. Views of Providence Saint John's Health Center are visible in the background to the west.

Surrounding Areas

McKinley ES is surrounded by residential neighborhoods—single-family and multifamily—to the immediate north, west, and south. Commercial uses are to the southeast and southwest, and medical offices are to the south across Santa Monica Boulevard. The surrounding residential neighborhood streets include Chelsea Avenue, Arizona Avenue, and 23rd Court (alley). Santa Monica Boulevard, a regional transportation corridor, is immediately south of the campus. Wilshire Boulevard is one block north of the campus.

North

Immediately adjacent to the Proposed Project's Site to the north is the intersection of Arizona Avenue and Chelsea Avenue, surrounded by single- and multifamily residential properties with a land use designation of Low Density Housing. Further northwest, approximately 0.10 miles from the campus, is Wilshire Boulevard, a mixed-use boulevard with commercial, residential, and open space land uses.

East

Existing uses east of the Proposed Project's Site are multifamily residential buildings along Chelsea Avenue that have a land use designation of Low-Density Housing, and commercial properties at the intersection of Chelsea Avenue and Santa Monica Boulevard with a land use designation of Mixed Use Boulevard Low.

South

Existing development south of the Proposed Project's Site along Santa Monica Boulevard generally consists of commercial properties that include an automobile dealership, retail establishments, and restaurants as well as the Parkside Medical Center, which consists of four-story medical offices buildings.

West

A paved alley (23rd Court) parallels the campus on the west and separates the Proposed Project's Site from two- and three-story multifamily residential development. Additionally, the Providence St. John's Healthcare

5. Environmental Analysis

AESTHETICS

Facility is along 23rd Street between Arizona Avenue and Santa Monica Boulevard, about a block southwest of the campus.

Light and Glare

The Proposed Project's Site is in an urbanized area and features a mix of residential, commercial, and healthcare uses and surface parking lots. Interior lighting emanating from existing structures, security lighting, and ornamental lighting fixtures are common sources of nighttime lighting in the surrounding area. Other existing sources of nighttime lighting include pole-mounted overhead streetlights along Santa Monica Boulevard, Arizona Avenue, and other local roads; traffic signals; pedestrian safety and security lighting installed at or near building entrances; signage; vehicle headlights; and parking-lot pole lights off of Chelsea Avenue.

In addition to these lighting sources, building materials are a potential source of glare in the area surrounding the campus during daytime hours. Specifically, glass windows and exposed metal features in local area healthcare and commercial buildings are sources of potential daytime glare.

Some land uses are considered "light-sensitive receptors," including residences, hotels, and convalescent homes, since these uses are typically occupied by persons who have expectations for privacy during evening hours and are subject to disturbance by bright sources of light. Light-sensitive uses near the Proposed Project's Site include the residential uses located immediately north, west, and east of the campus.

5.1.2 Thresholds of Significance

Appendix G of the CEQA Guidelines states that, "except as provided in Public Resources Code Section 21099," a project would normally have a significant effect on the environment if the project would:

- AE-1 Have a substantial adverse effect on a scenic vista.
- AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- AE-3 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.
- AE-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The IS/NOP, included as Appendix B, substantiates that impacts associated with the following thresholds would be less than significant; therefore, these impacts will not be further addressed in this DEIR:

1. Threshold AE-1
2. Threshold AE-2

These impacts are addressed in Chapter 6, *Other CEQA Considerations*, and in Appendix B of this DEIR.

5. Environmental Analysis AESTHETICS

5.1.3 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study/Notice of Preparation disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.1-1: The Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. [Threshold AE-3]

Construction

Construction activities would occur entirely within the McKinley ES campus. During the construction period, various types of construction equipment (e.g., backhoes, forklifts, skip loaders, and compaction rollers) would be present on-site to varying degrees and in various locations, depending on phase and activity. Construction activities would comply with SMMC 4.12.110. Before construction activities begin for any phase, temporary fencing would be installed around the construction areas. Construction activities at ground level would be largely obscured from off-site viewpoints by existing intervening fencing, buildings, and vegetation on the campus. Furthermore, visual effects from construction activities would be temporary and short term. As such, construction of the Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality of the campus. Impacts would be **less than significant**.

Operation

The Proposed Project's Site is in the City of Santa Monica (Mid-City neighborhood), which is highly urbanized. Therefore, evaluation as to whether the Proposed Project would substantially degrade the existing visual character or quality of public views of the site and its surroundings is not required. However, visual simulations were prepared for the public's information only and are not intended to support an analysis of any potential environmental impacts in this regard relative to CEQA requirements. The campus currently encompasses approximately 6.48 acres and contains four permanent buildings (Buildings A to D) and multiple modular and portable buildings (B1 to B11) (see Figure 3-4). The permanent buildings were constructed in Italian Renaissance Revival and Mid-Century Modern styles of architecture between 1923 and 1973. Additionally, the campus includes the Main and West Courtyards as well as the Santa Monica Boulevard Quad along the southern exterior of Building C that has several concrete walkways which historically provided pedestrian access to the original school entrance on Santa Monica Boulevard. The images depicted in Figures 5.1-2b, *Architectural Rendering of Public Viewing Point 1*, through 5.1-4b, *Architectural Rendering of Public Viewing Point 3*, are architectural rendering of public viewing points 1 through 3 and are intended to represent the anticipated visual character of the overall Project.

Figure 5.1-2b shows the proposed view from the area around Arizona Avenue and Chelsea Avenue looking south to the Proposed Project's Site after Project implementation. The Proposed on-site improvements would be visible to motorists and pedestrians along Arizona Avenue and Chelsea Avenue, in addition to residential properties located north of Chelsea Avenue and west of Arizona Avenue. The proposed two-story classroom building would be visible in the foreground, with the multistory Providence St. John's Healthcare Facility in the background.

5. Environmental Analysis

AESTHETICS

The two-story classroom building would be a visual element of increased bulk and scale; however, it would be adjacent to the existing two-story Building B and two-story Building C, which would both remain on-site. The proposed new classroom building would generally reflect the height and scale of existing on-site structures from this vantage point and would provide a stepped transition in heights. The new classroom building has been designed to reflect the visual character and appearance of existing on-site buildings in materials and color, and to respect and maintain the architectural design of the campus. The existing street trees would remain and would provide screening of views from vantage points along Chelsea Avenue and Arizona Avenue. As such, the Proposed Project is not anticipated to substantially change the overall character of the Proposed Project's Site.

Figure 5.1-3b, *Architectural Rendering of Public Viewing Point 2*, depicts the proposed viewshed from the midpoint along Chelsea Avenue between Santa Monica Boulevard and Arizona Avenue, looking southwest at the eastern portion of the McKinley ES campus. The proposed on-site improvements would be visible to motorists and pedestrians along Arizona Avenue and Chelsea Avenue, in addition to residential properties located north of Chelsea Avenue and west of Arizona Avenue. The proposed two-story classroom building would be visible in the foreground. The two-story classroom building would represent a visual element of increased bulk and scale; however, the building would be adjacent to the existing two-story Building B and two-story Building C, which would both remain on-site. The existing Building B and Building C are 41 feet 8 inches high and 38 feet 6 inches high, respectively. The proposed classroom building would be 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. It would be set back from Chelsea Avenue behind the new pick-up/drop-off queue. A new, approximately 24-foot-high East Loggia would be developed in front of the new Classroom Building for screening. The new East Loggia would reflect a similar style to the existing Building C east loggia, representing the existing frontage facing Chelsea Avenue. The height of the East Loggia would have a 15-foot setback from Chelsea Avenue, would be taller than the average heights of the students for security purposes. The East Loggia would serve to screen both views into the campus from Chelsea and views from the campus onto Chelsea.

The proposed outdoor classroom—part of the new classroom building—would be screened behind the new East Loggia. The new outdoor classroom would include a 4-foot-tall privacy, safety, and security wall (see Figure 5.1-5, *Building Sections*).

Figure 5.1-4b depicts the proposed viewshed from the intersection of Santa Monica Boulevard and Chelsea Avenue, looking west at the southeastern portion of the McKinley ES campus. The proposed on-site improvements would be visible to motorists and pedestrians along Santa Monica Boulevard. As described in Chapter 3, *Project Description*, existing Modular Building D would be removed as part of Phase 3 of the Proposed Project. Therefore, the proposed view looking northeast from Santa Monica Boulevard would be characterized by security fencing, landscaped open space, and the new arrival court and pick-up/drop-off queue; the existing Building C; and new classroom building in the foreground. The existing Building C along Santa Monica Boulevard and the multistory Providence St. John's Healthcare Facility would be visible in the background. As illustrated, the view would not be substantially altered because of the Proposed Project's implementation. The proposed two-story classroom building would be visible from this vantage point and would represent an element of increased height and scale on-site compared to existing conditions; however, due to the viewing angle and building orientation, the structure would not represent a visually dominant element within the view.

Figure 5.1-2b - Architectural Rendering of Public Viewing Point 1



5. Environmental Analysis

AESTHETICS

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Figure 5.1-3b - Architectural Rendering of Public Viewing Point 2



Source: Johnson Favaro, 2023.

5. Environmental Analysis

AESTHETICS

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Figure 5.1-4b - Architectural Rendering of Public Viewing Point 3



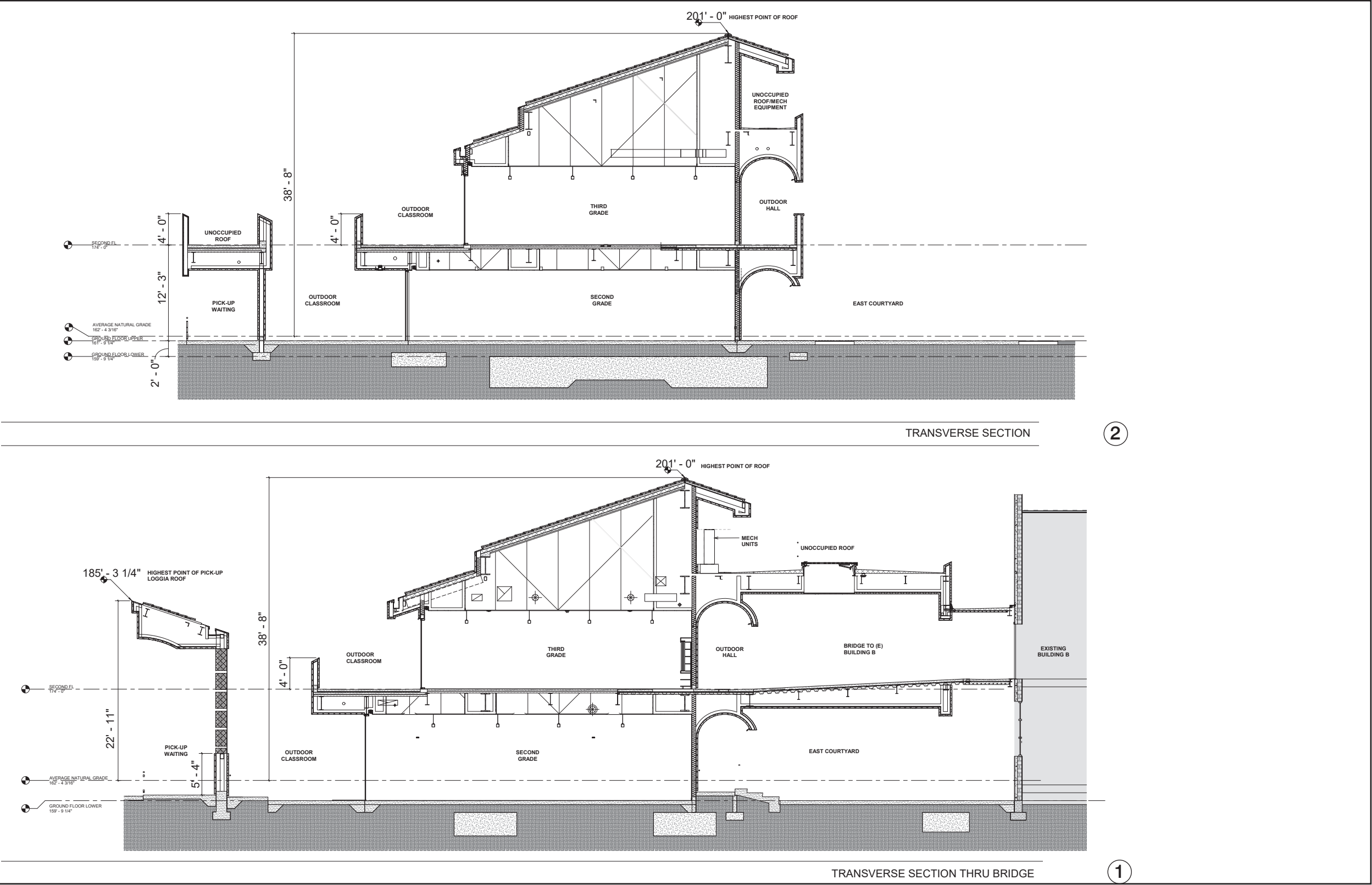
Source: Johnson Favaro, 2023.

5. Environmental Analysis

AESTHETICS

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Figure 5.1-5 - Building Sections



Source: Johnson Favaro, 2023.

5. Environmental Analysis

AESTHETICS

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5. Environmental Analysis

AESTHETICS

New development is governed by the City's zoning ordinance and the LUCE, which includes development standards and design policies. The new classroom building constructed along Chelsea Avenue would have a maximum height of 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. Though the building height would exceed the maximum permitted height of 32 feet above grade—as stipulated in Table 9.15.030, Development Standards – Public and Park Districts, of the SMMC Chapter 9.15—the new structure would be compatible with the existing Buildings B, which has a total height of 41 feet 4 inches, and Building C, which has a total building height of 38 feet 6 inches. Both these buildings would remain in place, integrating the proposed buildings to the existing campus. Development of the Proposed Project would comply with Policies LU15.10, N1.7, and N4.1 of the LUCE, to design buildings with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front; make new development projects of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes; and design new development to transition in size, height and scale toward adjacent residential structures. The proposed classroom building would be in conformance with the setback standards pursuant to the to SMMC Chapter 9.15, Public and Semi-Public Districts (A).

The proposed new buildings would be of quality design and would incorporate design features, colors, and exterior materials that are compatible with the surrounding landscape (see Figures 5.1-1 through 5.1-3) in compliance with Goal LU15 and Policies LU15.8 and LU15.10, which encourage well-developed design that is compatible with the neighborhoods and well-designed building façades with appropriate articulation in the form of setbacks, offsets, projections, and a mix of architectural materials and elements to establish an aesthetically pleasing pattern.

In compliance with Goal LU12 and Policies LU12.2 and LU12.3 of the LUCE, the Proposed Project would preserve all areas and structures in the campus's historical district, which characterize and represent the city's rich heritage and are considered eligible for listing in the California Register of Historical Resources and for designation as a City of Santa Monica historic district (HRG 2022),¹ including Buildings B and C, two site features (Santa Monica Boulevard Quad and Main Courtyard), and two additional features ("Storybook Land" Sculpture and WPA Bronze Plaque), with a period of significance from 1923 to 1937.

Additional elements of the Proposed Project, including renovations to Building C, the existing library, reconfiguration of the playfields and playground, and development of the new elevator and lunch shelter, would be interior alterations to the existing campus which would not require the erection of new structures over the permitted 32 feet and would not be visible from the surrounding neighborhood or from Santa Monica Boulevard and Chelsea Avenue; thus, these elements of the Proposed Project would not have the potential to degrade the visual character or quality of the area.

Table 5.9-2, *General Plan Relevance/Consistency*, has been provided to demonstrate overall consistency with the applicable aesthetic and visual policies from the LUCE. As demonstrated, development of the Proposed Project would generally be consistent and would comply with the policies in the SMMC and LUCE. Compliance with these goals and policies, as listed above, would ensure that implementation of the Proposed Project would not

¹ As governed by SMMC Section 9.56.100, Landmarks and Historic Districts Ordinance.

5. Environmental Analysis

AESTHETICS

result in the significant degradation of the visual quality of the campus and surrounding area. As such, the Proposed Project would result in a **less-than-significant** impact with respect to visual character and quality.

Impact 5.1-2: The Proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. [Threshold AE-4]

Construction

As detailed in Chapter 3, *Project Description*, of this EIR, the Proposed Project would be constructed in three phases over an approximately 7-year period. Proposed Project construction would begin as early as Summer 2023 and end in Spring 2030. Throughout the duration of construction, construction activities would typically occur during hours permitted by the SMMC Section 4.12.110, which limits the hours of construction to 8:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 5:00 p.m. on Saturday; and prohibits construction on Sundays and holidays. It is anticipated that all Proposed Project construction would occur during daytime hours. Portable temporary nighttime lighting would not be required during construction. Therefore, light and glare impacts during construction of the Proposed Project would be **less than significant**.

Operation

Light

As described above in Section 5.1.1, *Environmental Setting*, the Proposed Project's Site consists of a built-out school campus in a fully developed urbanized area. Existing light sources within the campus include interior and exterior building lighting and wayfinding lighting along campus pathways. Light sources surrounding the campus include interior and exterior lighting from residential and commercial buildings, streetlights, and vehicle lighting on local roadways. Light-sensitive receptors are generally considered to be residential properties, and may also include hospital, or nursing home uses, where excessive nighttime lighting may affect the use of the property. The nearest residences are across Chelsea Avenue and 23rd Court.

Development of the Proposed Project would include interior and exterior lighting sources, including outdoor wayfinding lighting along entryways and driveways and exterior security lighting along the perimeter of the proposed new buildings and within the relocated parking lots. Proposed Project lighting would be similar in intensity to existing conditions and surrounding uses. Consistent with existing conditions and the District's lighting standards, the Proposed Project would include only the minimum amount of outdoor lighting necessary to maintain safety and comfort. Nighttime lighting would be limited to wayfinding and security lighting, which would be shielded and directed on-site to minimize spillover effects and night sky pollution. To minimize spill lighting and glare impacts, all lighting from the Proposed Project would be LED, have full-cutoff shielding, and be aimed specifically to direct areas. Consequently, new lighting from the Proposed Project would not result in adverse nighttime views in the area. Impacts would be **less than significant**.

Glare

The Proposed Project would not use reflective building materials that would create new sources of glare during operation (see Figures 5.1-2b through 5.1-4b). The Proposed Project would comply with SMMC Section

5. Environmental Analysis

AESTHETICS

9.21.120, which prohibits the use of highly reflective materials. Section 9.21.120 states that no more than 25 percent of the surface area of any façade on any new building may contain black or mirrored glass or other mirror-like material that is highly reflective, and that materials for roofing must be nonreflective. Vertically retracting glass doors would primarily be situated toward the interior of the McKinley ES campus and would be limited to the lower story of the buildings. As such, any glare reflecting from the glass doors would be screened such that surrounding roadways and residences would not be adversely affected. The Proposed Project is not anticipated to introduce a new substantial source of glare to the Proposed Project's area such that daytime views are adversely affected. The Proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts related to scenic quality would be **less than significant**.

5.1.4 Mitigation Measures

No mitigation measures are required.

5.1.5 Level of Significance After Mitigation

All impacts are **less than significant**.

5.1.6 Cumulative Impacts

Aesthetic impacts are typically localized to the Proposed Project's Site and immediate surrounding area. The closest cumulative project to the Proposed Project's Site is the development at Providence St. John's Healthcare Center, approximately 0.04 mile southwest of the campus. The St. John's Healthcare Center is a larger existing development than the Proposed Project, with taller buildings and more sources of light than the Proposed Project. Development in the city of Santa Monica is subject to design review and adherence to applicable regulations and policies relating to scenic resources, visual quality, and lighting. Compliance with these policies would ensure that the future development would not result in a substantial adverse effect on a scenic vista or the degradation of the existing visual character or quality of the site and its surroundings. Cumulative projects could introduce new nighttime lighting and would be required to comply with regulations related to aesthetics and lighting and glare in the SMMC.

As described above, the Proposed Project would exceed allowable building heights; however, the Proposed Project would be compatible with the existing buildings on-site and in the immediately surrounding area. The Proposed Project would not create new sources of substantial light and glare that would affect day or nighttime views. Therefore, the Proposed Project's contribution to cumulative impacts would not be cumulatively considerable, and the cumulative impact of the Proposed Project would be **less than significant**.

5.1.7 References

California Department of Transportation (Caltrans). 2019. California State Scenic Highway System Map. Accessed December 1, 2022. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

5. Environmental Analysis

AESTHETICS

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Santa Monica, City of. 2015, July 24. Santa Monica Land Use and Circulation Element. Accessed December 1, 2022. https://learn.sharedusemobilitycenter.org/wp-content/uploads/policy-documents-4/Santa%20Monica_Revised%20LUCE%207.24.15_web.pdf.

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