

5. Environmental Analysis

5.9 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts to land use from implementation of the McKinley Elementary School Campus Master Plan (Proposed Project).

Land use impacts can be either direct or indirect. Direct impacts are those that result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans adopted for the purpose of avoiding or mitigating an environmental effect. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this DEIR.

The Santa Monica–Malibu Unified School District (SMMUSD or District) determined that an EIR would be required for this Proposed Project and issued an Initial Study/Notice of Preparation (IS/NOP) on January 13, 2023. 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 Proposed Project’s compatibility with the existing uses in the neighborhood and impacts to the community character 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. The IS/NOP and all scoping comment letters are included as Appendices B and C of this document.

5.9.1 Environmental Setting

5.9.1.1 REGULATORY BACKGROUND

State, and local laws, regulations, plans, or guidelines related to land use and planning that are applicable to the Proposed Project are summarized below.

Local

City of Santa Monica General Plan

The City of Santa Monica General Plan provides direction for the city’s growth and development. As a policy document, the General Plan serves as a guide to the adoption of laws necessary to execute its intent. Santa Monica’s General Plan consists of the following elements: 1) Land Use and Circulation, 2) Conservation, 3) Housing, 4) Open Space, 5) Noise, and 6) Safety. The elements and associated goals and policies most applicable to the Proposed Project include the Land Use and Circulation element, which is discussed below and in Section 5.12, *Transportation*; the Open Space element, which is further discussed in Section 5.11, *Recreation*; and the Noise Element, which is further discussed in Section 5.10, *Noise*.

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

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goals and policies related to community character and aesthetics are applicable to the entire city and relevant to the Proposed Project (City of Santa Monica 2015).

General: Citywide Land Use Policies

- **Policy LU1.5. Design Compatibility.** Require that new infill development 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 LU3.3. Focus on Local-Serving Uses.** Emphasize uses which address local-serving needs and daily resources necessary to reduce vehicle trips and vehicle miles traveled.

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

- **Policy LU4.1. Active Centers.** Create active neighborhood districts that cluster services, goods, and cultural and recreational uses within walking distance of residences to create a focus for community activity and an active environment that can sustain local uses.
- **Policy LU4.2. Uses to Meet Daily Needs.** Encourage uses that meet daily needs such as grocery stores, local-serving restaurants and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips.
- **Policy LU10.2. Benefits Tied to Community Values.** Require new development that requests height above the base to provide measurable benefits to foster complete neighborhoods and support the goals of the LUCE, including reducing vehicle trips and GHG emissions, maintaining diversity, and promoting affordable and workforce housing.
- **Policy LU10.4. Discretionary Review.** Require a discretionary review process with community input for projects above the base height except for 100 percent affordable housing projects. Inclusion of community benefits and specific findings will be required for conditional approval above the base height and density.
- **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.

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 LU15.3. Context-Sensitive Design.** Require site and building design that is context sensitive and contributes to the City's rich urban character.

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- **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

- **Policy N1.2.** Encourage enhancement of neighborhood services to achieve the goal of creating complete neighborhoods containing an optimal array of local-serving retail and services within walking distance and fostering new local-serving retail and services in areas currently lacking them.
- **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 N3: Locate services and amenities within walking distance of neighborhoods.

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

- **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.

Mid-City Neighborhood

McKinley ES is in the Mid-City neighborhood of Santa Monica. The following goals and policies related to land use and planning 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.

Open Space Element

The City of Santa Monica Open Space Element was adopted March 1997. The Open Space Element establishes the long-range vision for the future development of parks and open spaces in Santa Monica (Santa Monica 1997). The following objectives and policies related to parks and recreational facilities are relevant to the entire city and Proposed Project.

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Objective 1: Develop and maintain a diversified and balanced system of high-quality open space.

- **Policy 1.1.** Preserve existing public open space.
- **Policy 1.2.** Provide opportunities for the enjoyment of open space within every Santa Monica Neighborhood.

Objective 2: Expand the open space through use of public properties.

- **Policy 2.2.** Expand open space tole through shared use of certain facilities.
- **Policy 2.3.** Improve school sites as public open space.

Noise Element

The Noise Element provides guidance for comprehensive local programs to control and abate excessive noise and to protect residents from adverse noise impacts. The element provides information on the existing and projected noise environment and includes goals, objectives, policies, and implementation programs to ensure an acceptable noise environment. The element also identifies criteria to be used by decision makers in evaluating the noise implications of proposed projects.

The City of Santa Monica has adopted policies in support of Goal N-1, reducing noise where unacceptable to acceptable noise levels; Goal N-2, protect and maintain those areas having acceptable noise environments; and Goal N-3, provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. The following policies are relative to the Proposed Project:

- **Policy 2.** Incorporate noise considerations into land use planning decisions (as they apply to finished projects, not construction actions). These measures will be achieved through the following programs:
 - Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other noise sensitive area.
 - Encourage acoustical mitigation design in new construction.
- **Policy 3.** Develop measures to control non-transportation noise impacts.
 - Improve enforcement of required noise mitigation measures in building design.
- **Policy 4.** The City shall develop measures to control construction noise impacts. The following shall be considered:
 - Clearly state the permitted hours of construction and expressly prohibit construction on Sunday.
 - Consider exempting the resident/builders in single family zones from the Sunday construction and maintenance ban provided such construction is limited to the hours specified in the Noise Ordinance or meets the noise limits set in the Noise Ordinance.

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- During the environmental review of all projects, determine the proximity of the site to the established residential areas. If the project will involve pile driving, night time truck hauling, blasting, 24-hour pumping, or any other very high noise equipment, the environmental review shall include a construction noise alternative analysis. From this analysis specific mitigation measures shall be developed to mitigate potential noise impacts. This may include but not be limited to:
 - Requirements to use quieter albeit costlier construction techniques.
 - Notification of residences (homeowner and renters) of time, duration, and location of construction
 - Relocation of residents to hotels during noisy construction period.
 - Developer reimbursement to City for 24-hour on-site inspection to verify compliance with required mitigation.
 - Limit hours of operation equipment 15 dB above the noise ordinance to the hours of 10:00 AM to 4:00 PM.
- The selection of the above measures should be determined on a project-by-project bases depending on type of equipment used and the proximity to established residential areas.

City of Santa Monica Municipal Code

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

Chapter 9.15 Public and Semi-Public Districts

The PL Institutional/Public Lands zoning district is for public or semipublic 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. SMMC 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

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Table 9.15.030 Development Standards – Public and Park Districts

Standard	PL (Institution/Public Lands)
Additional Standards	
Fences and Walls	Maximum Height – Front Setbacks: - Hedges, fences and walls: 42 inches in height. - One pergola or similar feature: 8 feet in height and width and 3 feet in depth. Gates or doors are permitted within the frame of pergolas or similar features. - Ornamental attachments atop a fence or wall: 12 inches above the maximum height limit with a maximum width of 12 inches for each attachment and a minimum distance of 5 feet between each attachment. - A guardrail may exceed the maximum height limit for a fence or wall, but only to the minimum extent required for safety by the Building Code. Safety guardrails must be at least 50 percent visually transparent above the fence or wall height limit. Maximum Height – Side and Rear Setbacks: - Fences and walls: 8 feet. - Hedges: 12 feet, except that there is no height limit for hedges adjacent to and located within 10 feet of an alley, measured perpendicularly from the side or rear property line that is adjacent to the alley. - A guardrail may exceed the maximum height limit for a fence, but only to the minimum extent required for safety by the Building Code. Safety guardrails must be at least 50% visually transparent above fence height limit.
Landscaping	Dimension of Landscaped Areas. No landscaped area smaller than 2 feet wide in any horizontal dimension shall count toward required landscaping.
Lighting	- Residential Multiple-Unit Buildings. Aisles, passageways, and recesses related to and within the building complex shall be illuminated with an intensity of at least 0.25 foot-candles at the ground level during the hours of darkness. Lighting devices shall be protected by weather and vandal-resistant covers. - Nonresidential Buildings. All exterior doors, during the hours of darkness, shall be illuminated with a minimum of one foot-light candle of light. - 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 Illuminating Engineering Society of North America (IESNA) for “Cut Off” or “Full Cut Off” luminaries. - Light Trespass. Lighting may not illuminate other properties in excess of a measurement of 0.5 foot candles of light. - Maximum Height. The maximum height for exterior lighting shall be as follows: - Residential, Ocean Park Oceanfront Districts: 16 feet. - Nonresidential Districts: 26 feet.

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Table 9.15.030 Development Standards – Public and Park Districts

Standard	PL (Institution/Public Lands)
Off-Street Parking and Loading	Maximum Parking Requirements. The maximum number of parking spaces allowed shall be based on use type as listed in the table in Section 9.28.060, Off-Street Parking. The following rules apply when calculating maximum parking requirements: b. Maximum Amount of Parking. The maximum allowable amount of parking shall be 2 spaces or 5%, more, whichever is greater, than the quantities specified in Section 9.28.060, except for permanent public parking. No additional parking is allowed in excess of the quantities specified in Section 9.28.060 for the Downtown Community Plan area. In order to obtain approval for permanent public parking in excess of these maximum allowable amounts, a Conditional Use Permit approved by the Planning Commission shall be required pursuant to Chapter 9.41, subject to the following additional required findings: i. Parking provided in excess improves the pedestrian, transit, and bicycle network; ii. Vehicle movement on or around the project site associated with the excess parking does not unduly impact pedestrian spaces or movement, transit service, bicycle movement, or the overall traffic movement in the district; iii. Accommodating excess parking does not degrade the overall urban design quality of the project proposal; iv. All above-grade parking is architecturally screened and the excess parking does not diminish the quality and viability of existing or planned landscape enhancements; and v. Where off-street parking is proposed that exceeds the maximum quantities specified, such parking shall not be the principal use of the property. c. Replacement of Existing Parking. If a site contains existing surface parking that serves as Code or permit-required parking for an off-site user, such parking spaces may be replaced on-site as part of any redevelopment of the site, and such replacement parking shall not be considered parking that exceeds the quantities specified in Section 9.28.060 for purposes of subsection (A)(5)(b).
Signs	Marquee Signs. Marquee signs that do not extend more than 12 inches from the surface of the marquee, nor provide less than 8 feet of clearance above ground level are permitted. Wall Signs. Wall signs so long as the display surface of the sign does not extend more than 12 inches from the wall, is parallel with the wall, does not project above the top of the wall or parapet or more than 30 inches above the second-floor floor line in multistoried buildings, and does not contain copy or lighting on any surface parallel with the wall other than the sign face. A wall sign may be located on the sloping surface of a roof, with no air space between the roof and the sign, but may not project above the high point of the roof or be more than 12 inches in depth. The letter height of a wall sign located 25 feet from the property line in a single tenant building shall not exceed 30 inches.

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Table 9.15.030 Development Standards – Public and Park Districts

Standard	PL (Institution/Public Lands)
Screening	Location. Screening walls shall follow the parcel line of the parcel to be screened, or shall be so arranged within the boundaries of the parcel so as to substantially hide from adjoining properties the building, facility, or activity required to be screened. Materials. Industrial uses must provide a solid screening wall of stucco, decorative block, or concrete panel. Screening walls for other uses may be constructed of stucco, decorative block, concrete panel, wood or other substantially equivalent material. Chain-link fencing does not fulfill the screening wall requirement. Maintenance. Screening walls shall be maintained in good repair, including painting, if required, and shall be kept free of litter or advertising. Where hedges are used as screening, trimming or pruning shall be employed as necessary to maintain the maximum allowed height.

Source: SMMC 2022

In addition, pursuant to Chapter 9.15, Public and Semi-Public Districts (A), the following landscaping requirements apply:

1. **Setback Areas Adjoining Streets.** All visible portions of a required setback area adjoining a street that are not used for driveways or walks shall consist of planting areas, landscape, or pedestrian amenities.
2. **Interior Setback Areas.** At least 50% of each required interior side setback area and rear setback area shall be planting area having a minimum width of 7.5 feet adjoining a side or rear parcel line. The width of a required planting area may be reduced to 3 feet in one side or rear setback areas adjoining a driveway, and a nonresidential accessory structure may occupy a portion of the planting area in a rear setback area. (Added by Ord. No. 2486CCS §§ 1, 2, adopted June 23, 2015; amended by Ord. No. 2520CCS § 17, adopted June 14, 2016; Ord. No. 2649CCS § 21, adopted September 8, 2020).

Chapter 9.21 General Site Regulations

Chapter 9.21, General Site Regulations, applies development and site regulations, except where specifically stated, to development in all Districts. These standards are used in conjunction with the standards for each Zoning District located in Division 2, Base and Overlay Districts. Specifically, SMMC Section 9.21.080, Lighting, and Section 9.21.120, Reflective Materials, are applicable to the Proposed Project with respect to light and glare, as further discussed in Section 5.1, *Aesthetics*.

Chapter 9.28 Parking, Loading, and Circulation

Chapter 9.28 of the SMMC ensures that on-site parking and loading areas are designed and located to protect public safety; minimize congestion and conflict points on travel aisles and public streets; and, where appropriate, buffer surrounding land uses from their impact.

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Chapter 9.55 Architectural Review

Chapter 9.55, Architectural Review, promotes the public health, safety, and general welfare by establishing procedures and regulations deemed necessary to preserve existing areas of natural beauty and cultural importance and to ensure that buildings, structures, signs, or other developments are well designed, harmonious with surrounding developments, and contribute to the preservation of Santa Monica's beauty, spaciousness, and quality. Additionally, Chapter 9.55 helps prevent the development of structures or uses that are not of acceptable exterior design or appearance or are of inferior quality within the local environment or surrounding area by reason of appearance or value; eliminates conditions, structures, or uses that have the potential to degrade the health, safety, or general welfare of the community; and provides a continuing source of programs and means of improving the City's overall appearance.

Chapter 9.67 Parks and Recreation Development Impact Fee Program

This chapter of the SMMC implements the goals, objectives, and policies of the Open Space Element and the Parks and Recreation Master Plan when new development is constructed within the city limits. Imposing a fee that is reasonably related to the burdens on and increased demand for the City's parks and recreation facilities created by new development will assist the City to construct the required capital improvements to support the fulfillment of these goals, objectives, and policies.

Chapter 4.12 Noise

As further discussed in Section 5.10, *Noise*, of this EIR, the City of Santa Monica has established exterior noise standards to limit excessive noise from stationary sources. These standards are found in the SMMC in Section 4.12.060, Exterior Noise Standards, of the SMMC. Also applicable to the Proposed Project with respect to noise and vibration are SMMC Section 4.12.110, Restrictions on demolition, excavation, grading, spray painting, construction, maintenance or repair of buildings; Section 4.12.120, Posting of Construction Signage; Section 4.12.030, Exemptions; Section 4.12.130, Location, Screening and Noise Measurements of Mechanical Equipment; and Section 4.12.070, Vibration.

5.9.1.2 EXISTING CONDITIONS

Assessor's Parcel Number 4276-023-900 consists of a 6.48-acre rectangular parcel that includes the existing campus and is entirely owned by the District. As shown in Figure 3-2, *Aerial Photograph*, McKinley ES is in an urban area surrounded by residential, commercial, and institutional uses.

Originally built in 1922, McKinley ES serves students in preschool, transitional kindergarten, kindergarten, and grades one through five. As shown in Table 5.9-1, *Characteristics of Existing Buildings*, the campus includes three permanent buildings, identified as Buildings A through C; 11 portable classrooms and 1 modular classroom building, Building D; recreational portable, fields and playgrounds; a student garden; and a parking lot along Chelsea Avenue (see Table 3-1, *Characteristics of Existing Buildings*). The Proposed Project's Site includes a total existing building area of 63,171 square feet, which includes approximately 54,531 square feet of permanent building area and 8,640 square feet of relocatable building area (see Table 3-3, *Existing Campus Land Use*). The campus contains four permanent buildings (Buildings A to D) and multiple modular and portable buildings (B1 to B11).

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Table 5-9.1 Characteristics of Existing Buildings

Building Name	Year Built	Current Use	Building Square Feet	Building Type	Building Height	Number of Stories
A	1951	Multipurpose Cafeteria	4,439	Permanent	23 ft 8 in	1
B	1923	Classrooms	13,425	Permanent	41 ft 4 in	2
C	1923	Administration/Classrooms/ Multipurpose Auditorium	27,390	Permanent	38 ft 6 in	2
D	1973	Preschool Classrooms	3,796	Modular	11 ft 9 in	1
B1-B3	Unknown	Classrooms	2,880	Portable	12 ft	1
B4-B9	Unknown	Classrooms	5,760	Portable	12 ft	1
B10-B11	Unknown	Classrooms	1,920	Portable	12 ft	1
Recreational Building	Unknown	Recreation	468	Portable	12 ft	1

Source: Historic Resources Group 2022.

The existing athletic facilities at the school are available for community use through the Civic Center Act and joint-use agreement between the District and the City. When the school facilities are not in use and are not scheduled for school-sponsored or District-related events, certain community organizations and members are permitted to use them for their events by obtaining a Civic Center Permit from the SMMUSD. Permitted events may include community and/or city use of the playfields, common areas, and classrooms, as permitted in the 2022 “Master Facility Use Agreements with the Santa Monica-Malibu Unified School” (City of Santa Monica 2022a).

Operation of the school facilities for community use typically occur outside normal school operating hours, generally after 3:00 p.m. on weekdays and after 8:00 a.m. on Saturdays and Sundays, and all outdoor activities would be completed by sunset, on both weekdays and weekends. Indoor activities are typically completed by 9:00 p.m. but would be permitted until 10 p.m. Parking for community use would be provided in the school’s on-site surface parking lots. These occasional uses would not change with the Proposed Project.

Surrounding Land Uses

McKinley ES is surrounded by single-family and multi-family residential neighborhoods 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. Providence Saint John’s Health Center consists of midrise buildings to the west across 23rd Court. Residential properties located along Chelsea Avenue consist of both one- and two-story residences, residential properties along Arizona Avenue consist primarily of one-story residences, and residential properties along 23rd Court consist of two- and three-story residences. Additionally, commercial properties surrounding the campus along Chelsea Avenue and 23rd Court consist of one-story structures, and the medical offices located along Santa Monica Boulevard consist of three- and four-story structures. The campus is surrounded by properties zoned for Low-Density Residential (R2) and Mixed-Use Boulevard Low (MUBL) (Santa Monica 2015).

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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.

General Plan and Existing Zoning

The City of Santa Monica General Plan Land Use designation for the campus is Institutional/Public Lands. The zoning designation for the campus is Institutional/Public Lands (PL) (see Figure 3-3a, *General Plan Land Use*, and Figure 3-3b, *Zoning Designations*). As stated in the SMMC, permitted uses include public or semipublic facilities, including municipal offices, schools, libraries, museums, or performance spaces, cemeteries, corporation yards, utility stations, and similar uses. This zoning designation is consistent with the LUCE's Institutional/Public Lands land use designation. Additionally, according to the City of Santa Monica's Local Coastal Plan, the campus is not within the Coastal Zone; therefore, it is not subject to the City's Local Coastal Plan (LCP) (Santa Monica 2018a).

5.9.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- LU-1 Physically divide an established community.
- LU-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

5.9.3 Environmental Impacts

5.9.3.1 IMPACT ANALYSIS

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

Impact 5.9-1: Project implementation would not divide an established community. [Threshold LU-1]

The Proposed Project Site is within an established and currently operating elementary school campus. The surrounding area is fully developed with urban land uses, including residential land uses. Proposed Project construction and operational activities would occur within the existing campus and would not divide an established community. Therefore, **no impacts** related to the physical division of an established community would result from the Proposed Project.

Impact 5.9-2: Project Implementation [would/would not] conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]

The Proposed Project would provide 14 new classrooms to replace existing portable classrooms and new and reconfigured playfields/playgrounds and parking lots, for a total of 137,030 square feet of building space on

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the McKinley ES campus. At completion, the Proposed Project would result in a total of 33 classrooms, from preschool through 5th grade, including special education, and dedicated outdoor play areas for preschool through kindergarten, for a total of 182,284 square feet of building space. The existing capacity of the school would not be changed.

Policy Consistency

Land Use and Circulation Element

Table 5.9-2, *General Plan Relevance/Consistency*, has been provided to demonstrate overall consistency with the applicable policies from the General Plan's Land Use and Circulation Element that have been adopted for the purposes of avoiding or mitigating environmental impacts.

Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
Policy LU1.5. Design Compatibility. Require that new infill development 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.	Consistent. The McKinley ES campus is surrounded by dense multi-family residential neighborhoods immediately to the north, west, and south. Commercial uses are to the southeast and southwest, and medical offices are to the south, across Santa Monica Boulevard. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. The new structures would be compatible with the existing Building 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. Buildings B and C would remain in place, integrating the new building with the existing campus. The Proposed Project would incorporate heights and scale to maintain a generally consistent overall street front. The Proposed Project would be compatible in scale and character with the existing neighborhood and provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, <i>Aesthetics</i> , of this EIR). Therefore, the Proposed Project would be consistent with this policy.
Policy LU3.3. Focus on Local-Serving Uses. Emphasize uses which address local-serving needs and daily resources necessary to reduce vehicle trips and vehicle miles traveled.	Consistent. The Proposed Project would include the renovation and modernization of the existing McKinley ES campus. With respect to vehicle miles traveled (VMT), and as further discussed in Section 5.12, <i>Transportation</i> , under Tier 1 of the City's VMT screening criteria, projects that include new construction of educational facilities/institutions (such as increased classrooms, gym/recreational space, and other supportive areas), provided that there would be no student enrollment increase or if student enrollment is increased, 75 percent of the student body comes from within 2 miles of the school, would not result in significant adverse VMT impacts. The Proposed Project would fall under Tier 1 of the City's screening criteria and is screened out from further VMT analysis and is therefore deemed to have a less than significant VMT impact. As the Proposed Project would serve as a local educational facility and would not result in a significant adverse impact with respect to VMT, the Proposed Project would be consistent with this policy.
Goal LU4. Complete Sustainable Neighborhoods: Create complete neighborhoods that exemplify sustainable living practices with open spaces, green connections, diverse housing, local employment, and local-serving businesses that meet the daily needs of residents and reduce vehicle trips and GHG emissions.	Consistent. The Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. Since the modernization of the existing school campus would continue to be a local-serving land use, and because the Proposed Project would not result in adjusted attendance boundaries, an increase in student capacity or staff, the Proposed Project would not generate an increase in VMT. Overall, the redevelopment and operation of the Proposed Project would not generate annual emissions that exceed applicable standards. The Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. All new buildings developed under the Proposed

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Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
	Project would be designed using applicable green building practices, including those of the most current Building Energy Efficiency Standards (24 CCR Part 6) and CALGreen (24 CCR Part 11). The Proposed Project would be developed with High Performance Schools (CHPS) Green Building Resolution Standards and would be consistent with the energy-related goals and actions of the Districtwide Plan for Sustainability. With respect to open space, at completion of Phases 2 and 3 of the Proposed Project, the campus would contain a total of 173,878 square feet of open space, including 93,169 square feet of playfields and playgrounds, 72,605 square feet of landscaped areas, and 8,104 square feet of outdoor classroom space (see Table 5.11-1, <i>McKinley ES Campus Open Space</i>, in Section 5.11, <i>Recreation</i>). As the Proposed Project would continue to provide education services for the surrounding residential community, would incorporate sustainability practices into building design, and would result in additional open space at project completion, the Proposed Project would be consistent with this policy.
Policy LU4.1. Active Centers. Create active neighborhood districts that cluster services, goods, and cultural and recreational uses within walking distance of residences to create a focus for community activity and an active environment that can sustain local uses.	Consistent. As discussed above, the Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. As discussed in Section 5.12, <i>Transportation</i>, the Proposed Project would not conflict with the City's Pedestrian Action Plan. Additionally, the Proposed Project would include pedestrian access points to the campus via the new classroom buildings along Chelsea Avenue. Additionally, all other community recreational activities that occur under the Civic Center Permit would continue after the completion of construction, in compliance with Policy CE-1.8 and CE-1.9 of the Santa Monica General Plan, to improve and expand sports and recreational facilities throughout the City and provide recreational facilities, offering residents of all ages affordable and safe access to high-quality recreational opportunities. Therefore, the Proposed Project would be consistent with this policy.
Policy LU4.2. Uses to Meet Daily Needs. Encourage uses that meet daily needs such as grocery stores, local-serving restaurants and other businesses and activities within walking distance of residences to reduce the frequency and length of vehicle trips.	Consistent. The Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. As discussed in Section 5.12, <i>Transportation</i>, the Proposed Project would not conflict with the City's Pedestrian Action Plan. The Proposed Project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Chelsea Avenue and Arizona Avenue. Additionally, the Proposed Project would include pedestrian access points to the campus via the new classroom building along Chelsea Avenue. As the Proposed Project would serve as a local educational facility and would not result in a significant adverse impact with respect to VMT, the Proposed Project would be consistent with this policy.
Policy LU10.2. Benefits Tied to Community Values. Require new development that requests height above the base to provide measurable benefits to foster complete neighborhoods and support the goals of the LUCE, including reducing vehicle trips and GHG emissions, maintaining diversity, and promoting affordable and workforce housing.	Consistent. As shown below in Table 5.9-2, the Proposed Project would be compliant overall with the development standards and land uses pursuant to Chapter 9.15 of the SMMC. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. While the building heights 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 structures would be compatible with the existing Building 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 would remain in place, integrating the new buildings into the existing campus. The Proposed Project would be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front of compatible scale and character with the existing neighborhoods, providing respectful transitions to existing homes, and transitioning in size, height, and scale toward adjacent residential structures (see Figure 5.1-6, <i>Visual Simulations of Proposed Structures</i>, in Section 5.1, <i>Aesthetics</i>, of the EIR).

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Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
	As demonstrated in this consistency analysis, the Proposed Project would be substantially consistent with the LUCE. The Proposed Project would meet the LUCE goals for enhancing neighborhoods with design compatibility, focusing on local-serving uses by enhancing an existing campus serving existing surrounding neighborhood, and providing complete sustainable neighborhoods with benefits tied to community values. Although the Proposed Project's height would be 6 feet 8 inches over the maximum building height of 32 feet, pursuant to Section 9.15.030 of the SMMC, the Proposed Project would continue to provide education services for the surrounding residential community, would be compatible in scale and character with the existing campus and neighborhoods, would incorporate sustainability practices into building design, would result in additional open space at the Proposed Project's completion, would improve the pedestrian realm along Chelsea Avenue and Arizona Avenue, and would not result in a significant adverse impact with respect to VMT. Additionally, the McKinley ES campus would continue to provide recreational resources to the community in a joint use capacity, the same as under existing conditions. Therefore, the Proposed Project would be consistent with this policy.
Policy LU10.4. Discretionary Review. Require a discretionary review process with community input for projects above the base height except for 100 percent affordable housing projects. Inclusion of community benefits and specific findings will be required for conditional approval above the base height and density.	Consistent. As discussed above under Policy LU10.2, the Proposed Project would be compliant overall with the development standards and land uses pursuant to Chapter 9.15 of the SMMC. The new buildings 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. While the building heights 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 structures would be compatible with the existing Building 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, and both would remain in place, integrating the new buildings into the existing campus. The General Plan Land Use designations immediately to the east, west and south are Low-Density Housing and Mixed Use Boulevard Low. The base height in the Mixed-Use Boulevard Low District is 32 feet (2 stories) with a 1.5 FAR. A project will receive a 4-foot height bonus above the 32-foot base height, allowing for an additional floor of housing, by building the required affordable housing units in accordance with the percentage requirements specified in the City's Affordable Housing Production Program for the project as a whole. For Subject to a discretionary review process, projects that provide community benefits may request a height up to 36 feet and 1.75 FAR. Subject to a discretionary review process, projects that include additional community benefits may request a height up to 47 feet and 2.0 FAR based on location specified in the LUCE. The Proposed Project is designed with height and scale to create visual interest while maintaining a generally consistent overall street front with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figure 5.1-6, <i>Visual Simulations of Proposed Structures</i>, in Section 5.1, <i>Aesthetics</i>, of the EIR). As demonstrated in this consistency analysis, the Proposed Project would be substantially consistent with the LUCE. Although the Proposed Project's height would be 6 feet 8 inches over the maximum base height of 32 feet allowed, pursuant to Section 9.15.030 of the SMMC, the Proposed Project would continue to provide education services for the surrounding residential community, would be compatible in scale and character with the existing campus and neighborhoods, would incorporate sustainability practices into building design, would result in additional open space at the Proposed Project's completion, would improve the pedestrian realm along Chelsea Avenue and

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Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
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.	Arizona Avenue, and would not result in a significant adverse impact with respect to VMT. Therefore, the Proposed Project would be consistent with this policy. Consistent. The Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. The Proposed Project would be designed with height and scale to create visual interest while maintaining a generally consistent overall street front with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figure 5.1-6, <i>Visual Simulations of Proposed Structures</i>, in Section 5.1, <i>Aesthetics</i>, of this DEIR). The Proposed Project would continue to provide education services for the surrounding residential community, would be compatible in scale and character with the existing campus and neighborhoods, would incorporate sustainability practices into building design, would result in additional open space at project completion, and would improve the pedestrian realm along Chelsea Avenue and Arizona Avenue. Therefore, the Proposed Project would be consistent with this policy.
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.	Consistent. The Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. The Proposed Project would be designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figure 5.1-6, <i>Visual Simulations of Proposed Structures</i>, in Section 5.1, <i>Aesthetics</i>, of the EIR). The Proposed Project would continue to provide education services for the surrounding residential community, would be compatible in scale and character with the existing campus and neighborhoods, would incorporate sustainability practices into building design, would result in additional open space at the Proposed Project's completion, and would improve the pedestrian realm along Chelsea Avenue and Arizona Avenue. Therefore, the Proposed Project would be consistent with this policy.
Policy LU15.3. Context-Sensitive Design. Require site and building design that is context sensitive and contributes to the City's rich urban character.	Consistent. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. The new structures would be compatible with the existing Building 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 would remain in place, integrating the new buildings with the existing campus. The Proposed Project is designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figure 5.1-6, <i>Visual Simulations of Proposed Structures</i>, in Section 5.1, <i>Aesthetics</i>, of the EIR). As discussed in Section 5.1, <i>Aesthetics</i>, of this EIR, in compliance with Goal LU12 and Policies LU12.2 and LU12.3 of the LUCE, the Proposed Project would preserve all areas and structures within 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. Therefore, the Proposed Project would be consistent with this policy.

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LAND USE AND PLANNING

Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
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.	Consistent. As discussed in Section 5.1, <i>Aesthetics</i> , of this EIR, the proposed new buildings would be of quality design and would incorporate design features such as colors and exterior materials that are compatible with the surrounding landscape (see Figure 5.1-7, <i>Proposed Building Features</i>). The Proposed new buildings have been designed to break up the sight lines along Chelsea Avenue and has varied openings to break up the building massing. The second story would create a new sightline along the front of Chelsea Avenue. Additionally, the Proposed Project would be required to comply with SMMC Section 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. Therefore, the Project would be consistent with this policy.
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.	Consistent. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. The new structures would be compatible with the existing Building 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. Buildings B and C would remain in place, integrating the new buildings with the existing campus. The Proposed Project is designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be of compatible scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, <i>Aesthetics</i> , of the EIR). As such, the Proposed Project would be consistent with this policy.
Policy N1.2. Encourage enhancement of neighborhood services to achieve the goal of creating complete neighborhoods containing an optimal array of local-serving retail and services within walking distance and fostering new local-serving retail and services in areas currently lacking them.	Consistent. As discussed above, the Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. The District is enhancing the facilities at the McKinley ES campus to continue to meet the education needs of the residents of this community. The project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Chelsea Avenue and Arizona Avenue. Additionally, the Proposed Project would include pedestrian access points to the campus via the new classroom building along Chelsea Avenue. Therefore, the Proposed Project would be consistent with this policy.
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.	Consistent. The Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. The Proposed Project would be designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, <i>Aesthetics</i> , of the EIR). The existing public view of the McKinley ES campus from Santa Monica Boulevard would be improved with the removal of the modular classroom building along Santa Monica Boulevard. Proposed Project would continue to provide education services for the surrounding residential community, would be compatible in scale and character with the existing campus and neighborhoods, would incorporate sustainability practices into building design, would result in additional open space at the Proposed Project's completion, and would improve the pedestrian realm along Chelsea Avenue and Arizona Avenue. Therefore, the Proposed Project would be consistent with this policy.

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Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
Goal N3: Locate services and amenities within walking distance of neighborhoods.	Consistent. As discussed above, the Proposed Project would include the renovation and modernization of the existing McKinley ES campus. The campus serves the residential neighborhoods immediately to the north, west, and south. The Proposed Project would include landscaped sidewalks and setbacks to improve the pedestrian realm along Chelsea Avenue and Arizona Avenue. Additionally, the Proposed Project would include pedestrian access points to the campus via the new classroom building along Chelsea Avenue. Therefore, the Proposed Project would be consistent with this policy.
Goal N4: Ensure compatible design to preserve and enhance neighborhoods.	Consistent. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. The new structures would be compatible with the existing Building 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. Buildings B and C would remain in place, integrating the new buildings with the existing campus. The Proposed Project would be designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, <i>Aesthetics</i> , of the EIR). Therefore, the Proposed Project would be consistent with this policy.
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.	Consistent. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. The new structures 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, and would both remain in place, integrating the buildings the existing campus. The Proposed Project would be designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, <i>Aesthetics</i> , of the EIR). As such, the Proposed Project would be consistent with this policy.
Policy N4.4. Design new development or redeveloped structures in such a manner as to minimize impacts on or disruptions to neighbors.	Consistent. As detailed in Section 3, <i>Project Description</i> , 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. As further discussed on Section 5.1, <i>Aesthetics</i> , of the EIR, in the event portable lighting is required during construction of the Proposed Project, the Proposed Project would conform to applicable shielding, light trespass, and maximum height standards established by Section 9.21.080 of the SMMC. Compliance with SMMC general standards pertaining to shielding of lighting (see SMMC Section 9.21.080(C)) would also minimize the potential for portable lighting elements to create obtrusive glare on adjacent properties or public rights-of-way.

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Table 5.9-2 General Plan Relevance/Consistency: Land Use and Circulation Element

General Plan Policies	Relevance/Consistency
	As discussed in Section 5.12, <i>Transportation</i> , of this EIR, during construction of the Proposed Project, implementation of Mitigation Measure T-1 would require the construction contractor to prepare and implement a Temporary Traffic Control Plan to address safety hazards, including but not limited to avoidance of construction staging and delivery during off-peak pick-up/drop-off times, which would reduce the temporary impact. Additionally, construction traffic impacts would be localized and temporary and would not introduce a permanent hazardous condition to the local roadways. Therefore, with respect to minimizing disruptions to neighbors, specifically related to light, glare, noise, and traffic, the Proposed Project would be consistent.
Goal N23: Protect, preserve and enhance the Mid-City residential neighborhood and ensure compatible design.	Consistent. The new buildings constructed along Chelsea Avenue would have a maximum height of approximately 38 feet 8 inches above natural grade and would not contain any mechanical equipment on the roof. The new structures would be compatible with the existing Building 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. Buildings B and C would remain in place, integrating the buildings the existing campus. The Proposed Project would be designed with height and scale to create visual interest while maintaining a generally consistent overall street front along Chelsea Avenue with the existing campus. The Proposed Project would be compatible in scale and character with the existing neighborhoods and would provide respectful transitions in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, <i>Aesthetics</i>, of the EIR). Therefore, the Proposed Project would be consistent with this policy.
Source: City of Santa Monica 2015.	

Open Space Element

As shown in Figure 5.11-2, *Phase 1 Open Space and Recreational Facilities*, and Figure 5.11-3, *Phase 2 Open Space and Recreational Facilities*, in Section 5.11, *Recreation*, of this EIR, implementation of the Proposed Project would include the modernization and reconfiguration of the existing campus playground. Community recreational activities that occur under the Civic Center Permit would continue after the completion of construction, in compliance with Policies CE-1.8 and CE-1.9 of the Santa Monica General Plan, to improve and expand sports and recreational facilities throughout the city and provide recreational facilities, offering residents of all ages affordable and safe access to high-quality recreational opportunities. Additionally, the Proposed Project would be consistent with Objective 1, Policies 1.1 and 1.2 of the Open Space Element, which aim to develop and maintain a diversified and balanced system of high-quality open space, preserve existing public open space, and provide opportunities for the enjoyment of open space within every Santa Monica Neighborhood. Lastly, the Proposed Project would be consistent with Objective 2 and Policies 2.2 and 2.3 of the Open Space Element, which aim to expand the open space through use of public properties, expand open space through shared use of certain facilities, and improve school sites as public open space. Therefore, the Proposed Project would be consistent with the goals and policies identified in the Open Space Element.

Noise Element

As discussed in Section 5.10, *Noise*, of this EIR, the Santa Monica-Malibu Unified School District construction contract bid shall require the chosen construction contractor(s) to prepare a Construction Noise Control Plan.

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The details of the Construction Noise Control Plan would be included as part of the permit application drawing set and as part of the construction drawing set. The District would be required to follow the daytime construction noise standards shown in Table 5.10-5, *Santa Monica Construction Noise Standards*, (see also, **Mitigation Measure N-1**). Therefore, the Proposed Project would be consistent with Policies 2, 3, and 4 of the Noise Element, which aim to incorporate noise considerations into land use planning decisions, improve enforcement of required noise mitigation measures in building design, and develop measures to control construction noise impacts, respectively.

Chapter 9.15 Public and Semi-Public Districts

As shown in Table 5-3, *Summary of Proposed Project's Total Development*, the Proposed Project would provide 14 new classrooms, new and reconfigured playfields/playgrounds and parking lots, for a total of 137,030 square feet of building space on the McKinley ES campus. At completion, the Proposed Project would result in a total of 33 classrooms, from preschool through 5th grade, including special education, and dedicated outdoor play areas for preschool through kindergarten, for a total of 182,284 square feet of building space.

As shown below in Table 5.9-3, *Summary of Proposed Project's Total Development*, the Proposed Project would be compliant overall with development standards and land uses pursuant to Chapter 9.15 of the SMMC. The new buildings 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. While the building heights 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 structures would be compatible with the existing Building 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. Buildings B and C would remain in place, integrating the new buildings with the existing campus.

The Proposed Project would be designed with a variety of heights and shapes to create visual interest while maintaining a generally consistent overall street front, be of compatible scale and character with the existing neighborhoods, provide respectful transitions to existing homes, and transition in size, height, and scale toward adjacent residential structures (see Figures 5.1-1 through 5.1-5 in Section 5.1, *Aesthetics*, of the EIR). Notwithstanding the exceedance of the permitted maximum height by 6 feet 8 inches in the new buildings along Chelsea Avenue, the Proposed Project would be in substantial compliance with the development standards pursuant to Chapter 9.15 of the SMMC and therefore consistent with the SMCC.

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Table 5.9-3 Summary of Proposed Project's Total Development

Building	Status	Classrooms	Square Footage	Maximum Height
New Construction				
Phase 1				
One New Classroom Building (New Elementary Classrooms and New Front Office and School Support Spaces)	New	8	24,410	38 feet 8 inches
New Parking Lot (Arizona Avenue/Chelsea Avenue)	New	-	32,000	-
Renovated Library	Existing	-	1,354	No Change
Interim Playground ¹ and New Open Space	New	-	15,587	-
Phase 1 Development Square Footage	-	-	73,351	-
Phase 2				
Renovation of Building C	Existing	-	2,330	-
Lunch Shelter along Building A	New	-	3,500	-
New Elevator and Stair core for Building B and C.	New	-	870	-
Phase 2 Development Square Footage	-	-	6,700	-
Phase 3				
New Two-Story Building for T-K/Kindergarten and Elementary Classrooms	New	6	26,500	42 feet 8 inches
New Parking Lots (Arizona Avenue/23rd Court)	New	-	23,000	-
Reconfigured Playfields and New Open Space ² Space ²	New	-	7,479	-
Phase 3 Development Square Footage	-	-	56,979	-
Subtotal – New Development		14	137,030	
Existing Buildings				
Building A	Existing	-	4,439	23 ft 8 in
Building B	Existing	8	13,425	41 ft 4 in
Building C	Existing	11	27,390	38 ft 6 in
Subtotal - Existing Development		19	45,254	
Total		33	182,284	

Source: SMMUSD 2023.

¹ Interim playground located in place of portable buildings

² Includes outdoor classrooms

Section 9.15.030 Development Standards

As discussed in Section 5.1, *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.

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Chapter 9.21 General Site Regulations

Adherence to SMMC standards and regulations regarding lighting and reflective materials would ensure that the project would not result in adverse effects to daytime and nighttime views due to new lighting and glare.

Chapter 9.28 Parking, Loading, and Circulation

As discussed in Section 5.12, *Transportation*, the Proposed Project would be required to comply with the standards and requirements in the SMMC. Specifically, the Proposed Project would comply with Chapter 9.28, *Parking, Loading, and Circulation*, of the SMMC, with reconfiguration and implementation of new parking lots on the McKinley ES campus. Phase 2 of the Proposed Project would include implementation of a new interim parking lot along Chelsea Avenue and Arizona Avenue, which would be removed during Phase 3. Phase 3 of the Proposed Project would include the construction of a new permanent parking lot along 23rd Court in place of the previous garden and portable classrooms. Parking on the campus would increase from 90 stalls to 100 stall upon completion of the Proposed Project. Therefore, the Proposed Project would be consistent with the provisions established by the SMMC.

Chapter 9.67 Parks and Recreation Development Impact Fee Program

As further discussed in Section 5.11, *Recreation*, of this EIR, the Proposed Project includes the improvement of existing publicly available recreational facilities within the Proposed Project's Site. The Proposed Project would not involve any construction of recreational facilities beyond what is proposed to serve the existing and future students. As shown in Table 5.11-1, *McKinley ES Campus Open Space*, in Section 5.11, *Recreation*, of this EIR, at completion of Phases 2 and 3, the campus would contain a total of 173,878 square feet of open space, including 93,169 square feet of playfields and playgrounds, 72,605 square feet of landscaped areas, and 8,104 square feet of outdoor classroom space. Although playgrounds and play fields on the campus would be reduced by approximately 30,106 square feet at completion of the Proposed Project, compared to existing conditions, landscaped and open space areas on the campus would increase by approximately 29,481 square feet, and outdoor classroom space would increase by approximately 8,104 square feet. The Proposed Project is exempt from the City's Parks and Recreation Development Impact Fee Program.

Chapter 4.12 Noise

As discussed in Section 5.10, *Noise*, of this EIR, the SMMUSD construction contract bid would require the chosen construction contractor(s) to prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan would be included as part of the permit application drawing set and as part of the construction drawing set. Specifically, SMMC section 4.12.110(a) 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. The District would be required to follow the daytime construction noise standards shown in Table 5.10-5, *Santa Monica Construction Noise Standards* (see also **Mitigation Measure N-1**). Therefore, the Proposed Project would be consistent with the SMMC with respect to noise.

Conclusion

In summary, the Proposed Project would be consistent with the Institutional/Public Lands land use designation. The Proposed Project's development would not require modification to the General Plan land use

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and zoning designations. Development of the Proposed Project would be consistent overall with the goals and policies in the General Plan and the regulations and standards defined by the SMMC. Impacts would be **less than significant**.

5.9.4 Mitigation Measures

No mitigation measures are required.

5.9.5 Level of Significance After Mitigation

All impacts are **less than significant**.

5.9.6 Cumulative Impacts

The area considered for cumulative impacts is the neighborhoods surrounding the McKinley ES Campus and related projects. As discussed above, the Proposed Project substantially meets the objectives and goals of the City's General Plan and SMMC. The Proposed Project does not include mitigation measures for land use and planning impacts on the Proposed Project's Site. Therefore, the Proposed Project would not contribute to cumulative land use and planning impacts and would not be cumulatively considerable. As a result, cumulative impacts to land use and planning are considered **less than significant**.

5.9.7 References

Santa Monica, City of. 2015, July 24. Santa Monica Land Use and Circulation Element. Accessed March 7, 2023. https://learn.sharedusemobilitycenter.org/wp-content/uploads/policy-documents-4/Santa%20Monica_Revised%20LUCE%207.24.15_web.pdf.

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Southern California Association of Governments (SCAG). 2020, September 3. Connect SoCal. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.