

5. Environmental Analysis

5.12 TRANSPORTATION

This section of the Draft Environmental Impact Report (DEIR) evaluates the McKinley Elementary School Campus Master Plan Project's (Proposed Project) potential impacts on transportation and traffic.

The analysis in this section is based in part on the following technical report(s):

- *McKinley Elementary School VMT and Trip Generation Memo*, IBI Group, March 2023

A complete copy of this study is included in Appendix K to this DEIR.

A California Environmental Quality Act (CEQA) scoping meeting was conducted on January 31, 2023, where comments were expressed regarding vehicle and pedestrian circulation concerns during construction and operation of the Proposed Project. The IS/NOP and all scoping comment letters are included as Appendices B and C of this document.

5.12.1 Environmental Setting

5.12.1.1 REGULATORY BACKGROUND

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

State

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of SB 375, the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce Vehicle Miles Traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by Assembly Bill (AB) 32. Additionally, AB 1358, described subsequently, requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changes transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). As part of the new CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (California Public Resources Code section 21099[b][1]). On January 20, 2016, the Governor’s Office of Planning and Research (OPR) released proposed revisions to its CEQA Guidelines for the implementation of SB 743. OPR developed alternative metrics and thresholds based on VMT. The guidelines were certified by the Secretary of the Natural Resources Agency in December 2018, and automobile delay, as described solely by LOS of similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. As of July 1, 2020, lead agencies are required to consider

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VTM as the metric for determining transportation impacts. The guidance provided relative to VMT significance criteria is focused primarily on land use projects, such as residential, office, and retail uses. However, as noted in the updated CEQA Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The Santa Monica-Malibu Unified School District (SMMUSD or District) has not yet adopted a VMT threshold for use in determining significant transportation impacts under CEQA, and are relying on the City of Santa Monica's adopted VMT screening criteria and significance thresholds.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, was adopted in September 2020. The 2020 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2020 RTP/SCS charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians. The 2020 RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders within the SCAG counties (SCAG 2020).

As stated in the Connect SoCal, SB 375 requires SCAG and other Metropolitan Planning Organizations (MPO) throughout the State to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas (GHG) emissions through integrated transportation, land use, housing, and environmental planning (SCAG 2020). Within the Connect SoCal, the overarching strategy includes plans for High-Quality Transit Areas (HQTAs), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. HQTAs are described as generally walkable transit villages or corridors that are within 0.5-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs, and the Proposed Project's Site is located within an HQTA (SCAG 2020).

Local

City of Santa Monica Municipal Code

The City's Municipal Code (Municipal Code or SMMC) establishes regulations and standards for development in the City of Santa Monica.

Chapter 9.28, Parking, Loading, and Circulation

Chapter 9.28 of the Municipal Code 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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City of Santa Monica General Plan

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 transportation and traffic, are applicable to the entire City and relevant to the Proposed Project (City of Santa Monica 2015).

Circulation Element

- **Policy T8.4.** Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.

Goal T24: Provide adequate parking availability for commuters, visitors and shoppers throughout the day.

- **Policy T25.1.** Require adequate on-site loading areas for child care centers, healthcare offices and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas.
- **Policy T25.2.** Require that parking be accessed only from alleys, where alley access is available.

Pedestrian Action Plan

The Pedestrian Action Plan continues the City's longstanding effort to prioritize people walking in its planning and transportation decisions, promoting equity, and ensuring comfort for a wide range of users. The following goals and policies related to pedestrian safety, are applicable to the entire City and relevant to the Proposed Project (City of Santa Monica 2016).

Goal 1. Vision Zero: The safety of people walking in Santa Monica is a shared responsibility.

Goal 2. A Healthy Community: Streets and sidewalks are designed to promote the healthy, active and safe Santa Monica lifestyle.

Goal 3. Community Compassion and Equity: Citywide investments foster a sense of community by supporting people of differing abilities and promoting social equity.

Goal 7. Pedestrian Awareness and Education: The community has a high awareness about safety, the benefits of walking for good health, and the viability of walking in Santa Monica.

Goal 8. Coordinated City Efforts> City departments work together to improve conditions for walking.

Safe Routes to School

Safe Routes to School (SRTS) is a sustained effort to improve the health and wellbeing of children by helping families to feel confident walking, biking, and skating to school. The SRTS has two top priorities:

- Build safety improvements on neighborhood streets connecting students' homes to their school.

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- Promote a culture in school communities that prioritizes safety, physical activity, and sustainable transportation.

The City's SRTS program aims to make taking active transportation to school a customary part of everyday life and includes the Bike It Walk It encouragement events each fall and spring, safety training for students and their parents, outreach and events, and infrastructure improvements. As part of the City's SRTS program, staff conducted walk audits in partnership with students, parents, and faculty at six schools including McKinley Elementary. An SRTS Walk Audit Report (2018) was released and includes preliminary recommendations including, but not limited to, curb extensions, curb ramp improvements, new or improved crosswalks, installation of rectangular rapid flashing beacons (RRFBs), pavement markings and signage enhancements, enhanced bicycle accommodations, lighting enhancements, and modifications to on-street parking and short-term loading regulations to better facilitate school pick-up and drop-off needs (City of Santa Monica 2019). Proposed improvements near McKinley ES campus include:

- Santa Monica Boulevard and Chelsea Avenue: Analyze feasibility of new striping and signage to reduce left turn conflicts
- Santa Monica Boulevard and Cloverfield Boulevard: Evaluate signal timing and phasing
- Santa Monica Boulevard and 23rd Street: Evaluate signal timing and phasing
- Arizona Avenue and Chelsea Avenue: Evaluate drop off/pick up (DOPU) zones to reduce conflict points
- Arizona Avenue and 23rd Street: Analyze feasibility of curb extensions at all corners
- Arizona Avenue and 24th Street: New high visibility crosswalk
- Arizona Avenue and Chelsea Avenue: Analyze feasibility of curb extensions at all corners

Through these efforts, students in Santa Monica will have the resources to move safely through their hometown, connect with their environment, and practice living sustainably.

5.12.1.2 EXISTING CONDITIONS

Existing Transportation System

Roadway Network

Access to the campus is provided by the surrounding roadway network, which includes Interstate 10 (I-10), State Route (SR) 1, Santa Monica Park Boulevard, Chelsea Avenue, Arizona Avenue, and 23rd Court.

Highways

The McKinley ES campus is located in the Mid-City neighborhood of the City of Santa Monica. The Santa Monica Freeway, Interstate (I) 10 provides east/west access across the City of Santa Monica to the City of Los Angeles, and also connects to the San Diego Freeway (I-405) and Pacific Coast Highway (PCH).

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Street Network

The campus is bounded by Santa Monica Boulevard to the southeast, Chelsea Avenue to the northeast, Arizona Avenue to the northwest, and 23rd Court (alley) to the southwest.

- **Santa Monica Boulevard** is designated a Boulevard, which is a regional transportation corridor with continuous mixed-use and commercial land uses. Provides access for all forms of transportation, but emphasizes transit and walking. Regional auto traffic is accommodated here in order to minimize regional traffic on parallel streets (City of Santa Monica 2015).
- **Arizona Avenue** and **Chelsea Avenue** are designated as neighborhood streets, which provide access primarily to abutting uses. Autos travel slowly enough to stop for people in the street.
- **23rd Court** is an alley, which provide local property access.

Existing School Operations and Circulation

Vehicular access to the campus is provided via two surface parking lots located along Chelsea Avenue. Additional parking is provided along the southern portion of the campus, near Santa Monica Boulevard and 23rd Court. Pedestrian access to the campus is provided via Santa Monica Boulevard, Chelsea Avenue and Arizona Avenue (see Figure 5.12-1, Existing Vehicular/Pedestrian Circulation).

Both staff parking, early education parking, and student DOPU are through the Chelsea Avenue parking lot. All grades at the school begin 8:00 a.m. and 8:20 a.m. with TK-K dismissed at 1:35 p.m. and Grades 1 through 5 between 2:45 p.m. and 3:00 p.m. during the week, except for Wednesdays where Grades 1 through 5 are dismissed at 1:45p.m.

Student DOPU

The current DOPU operations occur primarily at three locations:

- **Parking Lot DOPU** – DOPU counterclockwise drive-through lane system in parking lot. Provides access to Parking Lot Gate and Courtyard Gates for Grades 1 through 5, Office/Breakfast entrance, and TK/K Gate for TK/K students.
- **Chelsea Avenue DOPU** – Chelsea Avenue at the eastern side of the school via neighborhood on-street parking. Provides access to Parking Lot Gate and Courtyard Gates for Grades 1 through 5, Office/Breakfast entrance, and TK/K Gate for TK/K students.
- **Arizona DOPU** – Arizona Avenue at the northern end of the school via neighborhood on-street parking. Provides access to Arizona Gate for Grades 1 through 5.

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School Trip Generation and Distribution

The existing trip generation for McKinley Elementary School was estimated using the rate published for Land Use Code 520 (Elementary School) in the Institute for Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). The Proposed Project would not eliminate the school's existing programs, and it is not the intent of the Proposed Project to expand the school enrollment capacity. The most recent student population figure was 688 students, approximately 48 of which are TK, and Kindergarten students and 640 students in Grades 1 through 5.

An estimated 1,562 daily trips are generated with 516 trips being in the morning peak drop-off time (AM) (279 inbound and 237 outbound) and 310 trips in the afternoon peak drop-off (PM) (142 inbound and 167 outbound) and accounts for students who walk or are walked to school. Table 5.12-1, *Project Trip Generation Rates*, summarizes the estimated existing trip generation of the school based on a student population of 688.

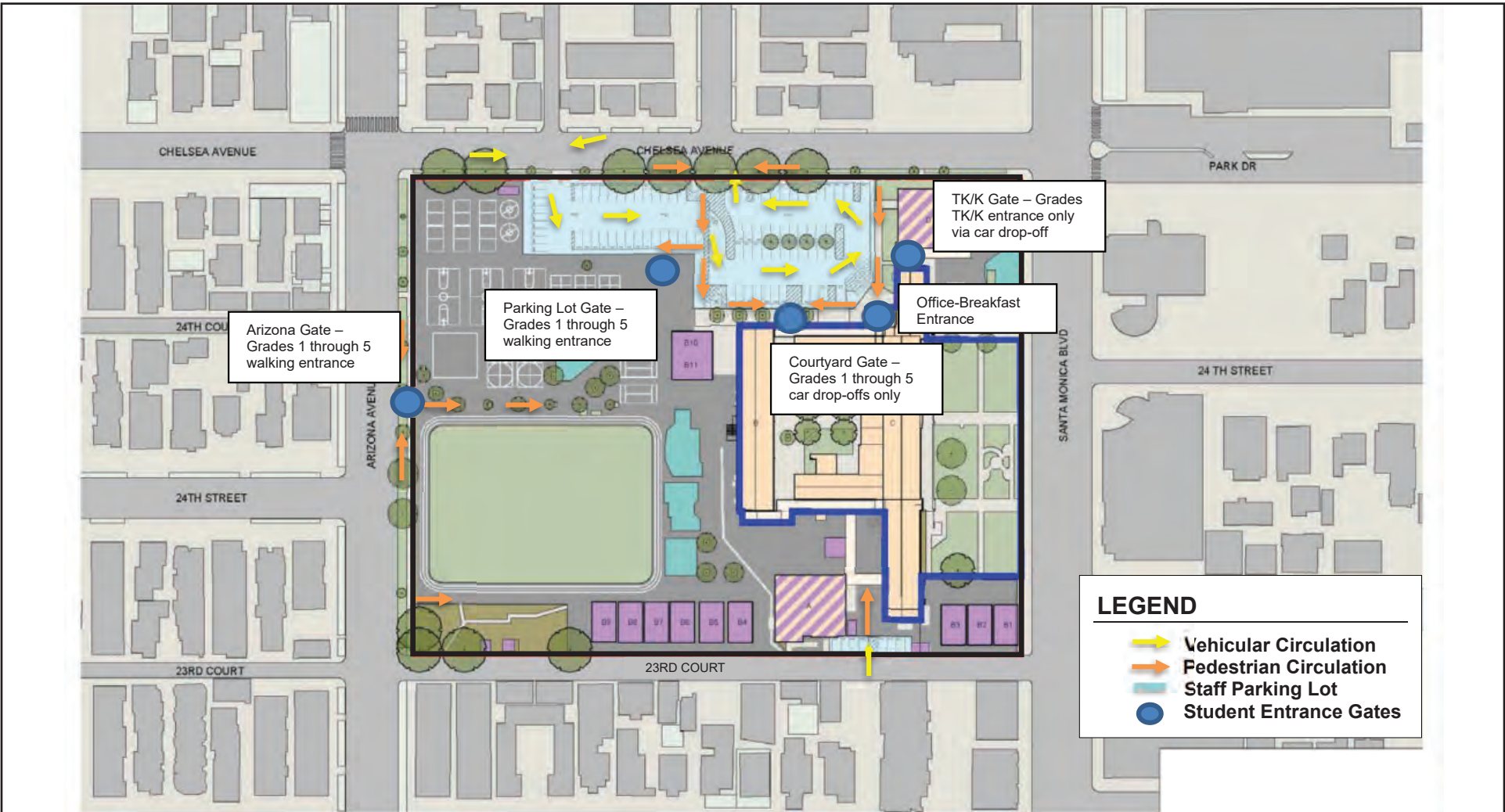
Table 5.12-1 Existing Campus Trip Generation and Rates

Source	Land Use	Students	Trip Generation						
			Daily	AM Peak Drop-Off			PM Peak Pick-Up		
				In	Out	Total	In	Out	Total
Rates									
ITE Code 520	Elementary School		2.27	0.41	0.35	0.75	0.21	0.24	0.45
Estimated School Trips									
	TK, and K	48	109	19	17	36	10	12	22
	Grades 1-5	640	1,453	259	221	480	132	156	288
	Total	500	1,562	279	237	516	142	167	310

Source: IBI Group 2023

The trip generation was further broken down by grade level. TK and K generate approximately 109 daily trips with 36 occurring in the morning AM (19 inbound and 17 outbound) and 22 trips in the afternoon PM (10 inbound and 12 outbound). Grades 1 through 5 are estimated to generate approximately 1,453 daily trips with 480 occurring in the morning AM (259 inbound and 221 outbound) and 288 in the afternoon PM (132 inbound and 156 outbound). It is assumed that the traffic associated with the TK and K utilize the both the Parking Lot and Chelsea DOPU areas to access the TK/K Gate and traffic associated with Grades 1 through 5 use all three DOPU areas (Parking Lot, Arizona, and Chelsea) (IBI Group 2023).

Figure 5.12-1 - Existing Vehicular Pedestrian Circulation



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5.12.2 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:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

5.12.3 Environmental Impacts

5.12.3.1 METHODOLOGY

The analysis of consistency with circulation plans, programs, ordinances, and policies reviews the Proposed Project and determines whether the Proposed Project would obstruct or conflict with the applicable plans, programs, ordinance, and policies listed in the Regulatory Framework.

VMT

Section 15064.3 of the revised CEQA Guidelines was adopted by the Office of Planning and Research on December 28, 2018, and states that vehicles miles traveled (VMT) is the appropriate measure of transportation impacts. Section 15064.3(c) also states that the provisions of this section shall apply prospectively (i.e., only applicable to new projects after date of adoption) and must be implemented statewide by July 1, 2020. In June 2020, the City of Santa Monica adopted new VMT screening criteria and significance thresholds pursuant to Section 15064.3.

Vehicle miles traveled (VMT) is an indicator of the travel levels on the roadway system by motor vehicles. It corresponds to the number of vehicles multiplied by the distance traveled in a given period over a geographical area. In other words, VMT is a function of (1) number of daily trips and (2) the average trip length ($\text{VMT} = \text{daily trips} \times \text{average trip length}$).

The City's adopted screening criteria is the first step in the transportation review process to "screen" out projects from VMT analysis. Projects meeting the VMT screening criteria are deemed to have a less than significant impact and no further VMT analysis is necessary. The tiered screening criteria for land use projects are described below.

- **Tier 1:** Does the project include the development of the following land uses, which are screened out from further analysis? If yes, no further analysis is required. If no, move to Tier 2.

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- Land Uses Screened from VMT Analysis:
 - 200 residential dwelling units or less
 - 100% affordable housing
 - 50,000 sf or less of commercial floor area by land use type¹
 - 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% of the student body comes from within 2.0 miles of the school
 - Expansions of civic/government use (such as fire and police stations) and utility facilities less than 50,000 sf or replacement of such uses/facilities (in same or another location) to serve the community, or if larger than 50,000 sf, the project would not result in more than 50 net new additional full time equivalent employees
 - Local serving Parks and Recreational facilities, as determined by City Staff For a mixed-use project, the individual components of the project should be evaluated to determine if each can be screened out. For example, a mixed-use project with 150 units and 75,000 sf of office area cannot be screened out at the Tier 1 level and would be required to move to Tier 2.
- **Tier 2:** Is the project located within 0.5-mile walking distance of an Expo LRT station or 0.25 walking distance of Rapid BRT stop? If no, conduct VMT analysis. If yes, move to Tier 3.
- **Tier 3:** Would the project provide more parking than required by Code (or if located in the Downtown, exceed parking maximums)? If no, no further analysis is required. If yes, conduct VMT analysis.

Additionally, a land use project would be screened from VMT analysis and concluded to have a less than significant impact if:

- A project decreases [total] vehicle miles traveled in the project area compared to existing conditions or
- A redevelopment project replaces existing VMT generating land uses with new uses that result in a net overall decrease in VMT.

Projects that are screened out based on the criteria above are presumed to have a less than significant impact on transportation and as such, no VMT analysis is required.

Hazardous Design Features

The analysis evaluates whether the Proposed Project would result in hazards due to design features by determining whether the Project would include curved streets with inadequate view distances, unsafe separation of vehicles and pedestrians or bicyclists, and not provide adequate pedestrian crosswalks at intersections.

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Emergency Access

The emergency access analysis evaluates whether the Proposed Project would comply with City emergency access requirements including those imposed by the Santa Monica Fire Department regarding adequate turning radii on streets, response distances to buildings, etc.

Field Observations

Field observations of the Proposed Project's Site were conducted by IBI staff on Tuesday, May 24, 2022, and identified existing traffic patterns, access points, DOPU operations, pedestrian/vehicular conflict areas, and pedestrian circulation.

5.12.3.2 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 5.12-1: The Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. [Threshold T-1]

SCAG RTP/SCS

The Proposed Project would result in the modernization and redevelopment of the existing campus. It would not result in an increase in student capacity or staffing levels in the school and would therefore not result in an increase of vehicle trips following Proposed Project buildout. Construction and operation of the Proposed Project would not prohibit or interfere with the RTP/SCS GHG per-capita reduction targets of 8 percent by 2020 and 19 percent by 2035, or the associated reduction in VMT per capita for year 2045 by 4.1 percent compared to baseline conditions for the year. Since the Proposed Project would operate in the same capacity as existing conditions, it would not conflict with the 2020-2045 RTP/SCS "core vision" regarding maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by locating housing, jobs, and transit closer together and increasing investments in transit and complete streets. Therefore, the Proposed Project would be consistent with the SCAG RTP/SCS.

Santa Monica General Plan

The Proposed Project would not require the implementation or alteration of any public roadways in the areas surrounding the campus. As shown in Table 5.12-2, *Consistency with Goals and Policies Addressing the Circulation System*, the Proposed Project would be consistent with all applicable goals and policies from the City of Santa Monica's General Plan.

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Table 5.12-2 Consistency with Goals and Policies Addressing the Circulation System

Circulation Element	
Policy T8.4. Design buildings to prioritize pedestrian access from the street, rather than from a parking lot.	Consistent. The Proposed Project would include new entrances for students to the McKinley ES campus via Chelsea Avenue.
Goal T24: Provide adequate parking availability for commuters, visitors and shoppers throughout the day.	Consistent. The Proposed Project would include one interim parking lot along Chelsea Avenue during Phase 2, in addition to one permanent parking lot along 23rd Court during Phase 3. Parking on the campus would increase from the current 90 stalls to 100 stalls upon completion of the Proposed Project.
Policy T25.1. Require adequate on-site loading areas for child care centers, healthcare offices and other uses with intensive passenger drop-off demands, and work with schools to encourage provision of adequate loading areas.	Consistent. New on-site drop-off and pick-up areas would be implemented along Chelsea Avenue. The preschool, transitional kindergarten, and kindergarten classrooms would provide separate dedicated entrances with dedicated parking for parents to walk children into class, and a dedicated reception and office area required near drop-off/pick-up. Special education classrooms would provide access to dedicated drop-off/pick-up to accommodate buses; adjacency to parking (for instructors, aides, and volunteers); easy access to general classrooms, multipurpose room, library, and other daily use programs; proximity to administrative services, including nurse, flex administration office areas, psychology, speech therapy, and adjacency to culinary cafe for integration with the rest of the student body.
Policy T25.2. Require that parking be accessed only from alleys, where alley access is available.	Consistent. Upon completion of the Proposed Project, permanent faculty parking would be location along 23rd Court (alley).

The Proposed Project would not adversely affect any existing or planned transit, bicycle, or pedestrian facilities. Additionally, because the Proposed Project would not increase enrollment or capacity, there would not be an increase in demand for these facilities. The Proposed Project would not alter the current travel patterns or pedestrian activity already experienced and planned for under existing conditions.

Santa Monica Municipal Code

The Proposed Project would comply with the standards and requirements set forth 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 within the McKinley ES campus. Phase 1 of the Proposed Project would include implementation of a new interim parking lot located alone Chelsea Avenue and Arizona Avenue, which would be removed during Phase 3 of the Proposed Project. Phase 3 of the Proposed Project would include the construction of a new permanent parking lot located along 23rd Court, in place of the preview garden and portable classrooms. Parking on the campus would increase from 90 stalls or 100 stall upon completion of the Proposed Project. Therefore, the Proposed Project would not conflict with the SMMC such that a significant adverse impact to transportation would occur.

Pedestrian Action Plan

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

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campus via the new classroom and office building located along Chelsea Avenue. As described below the Proposed Project would not conflict with the Pedestrian Action Plan. The Goals of the Pedestrian Action Plan are:

- Goal 1: Vision Zero. The safety of people walking in Santa Monica is a shared responsibility. The City's SRTS program would provide pedestrian safety near the McKinley ES Campus. When the City proceeds with modifications under the SRTS program around the McKinley ES campus, the District will coordinate with the City for SRTS project implementation.
- Goal 2: A Healthy Community. Streets and sidewalks are designed to promote the healthy, active and safe Santa Monica lifestyle. The Proposed Project would be confined to the Proposed Project's Site and would not construct or modify the surrounding circulation network, including roads and pedestrian facilities.
- Goal 4: Sustainability and Stewardship. More people walk in Santa Monica than ever before, which promotes environmental sustainability and stewardship of our natural resources. The Proposed Project would modernize the existing McKinley ES campus that currently serves the surrounding community. The Proposed Project would continue to serve the local community residents and would not construct or modify the surrounding circulation network, including roads and pedestrian facilities. The Proposed Project would not alter attendance boundaries resulting in increased walking distances.
- Goal 5: Walking as the First Choice. Santa Monica makes transportation, land use and building design decisions that make walking a logical first choice transportation option for those who are able. The Proposed Project would be consistent with Goal 5 (see consistency analysis in Goal 4 above).
- Goal 6: A Barrier-Free Network. Santa Monica has a pedestrian network that connects transit, bicycling and shared parking options. The Proposed Project would be consistent with this goal. See Goals 1 through 5 above.
- Goal 7: Pedestrian Awareness and Education. The community has a high awareness about safety, the benefits of walking for good health, and the viability of walking in Santa Monica. The Proposed Project would be consistent with Goal 7. The Proposed Project would improve pedestrian circulation and safety on campus. The District will coordinate with the City when the City implements the SRTS program near the McKinley ES campus.
- Goal 8: Coordinated City Efforts. City departments work together to improve conditions for walking. The District will continue to coordinate with the City during the City's implementation of SRTS.

Safe Routes to School

The Proposed Project would not conflict with the goals and objectives the City's SRTS program. The Proposed Project would include a new early education/visitor parking lot with 15 parking stalls on Chelsea Avenue that would include an off-street lane for drop-off/pick-up and an arrival court east of the existing Building C. The City is developing local transportation funds to implement the proposed improvements based on the SRTS walking audits conducted in 2018 as described above (City of Santa Monica 2023). Once funding is secured, the City will coordinate with the District to implement these improvements.

In summary, the Proposed Project would be confined to the Proposed Project's Site and would not construct or modify the surrounding circulation network, including roads and pedestrian facilities. Therefore, the

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Proposed Project would not conflict with any regulations set forth by the City of Santa Monica's General Plan and/or Municipal Code. Therefore, the Proposed Project would not conflict with a program, plan, ordinance, or policy regarding public transit, roadway, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Impacts would be considered **less than significant**.

Impact 5.12-2: The Proposed Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). [Threshold T-2]

Construction

Construction of the Proposed Project would require the mobilization of workers, vendors, equipment, and haul trucks to and from the campus, which would generate a temporary increase in traffic. The VMT of construction workers is not newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites in which workers travel to each day. Therefore, construction workers are not generating new trips each day, only redistributing them. Construction of the Proposed Project construction activities would be temporary and intermittent in nature occurring in three phases between the summer of 2023 and 2028; and thus, would not result in long-term increases in vehicular trips. Therefore, construction activities are not expected to significantly increase VMT in the region, and the VMT impact related to construction would **be less than significant**.

Operation

The Proposed Project would modernize the McKinley ES campus and would not change the land use of the school, increase the capacity of the school, or change the attendance boundaries of the school. As described above, the City has adopted screening criteria that can be used to “screen” out projects from VMT analysis. The Proposed Project was reviewed against the City's VMT screening criteria system to determine if a VMT analysis would be required. Under Tier 1 of the City's VMT screening criteria, projects that required development of specific land uses, are screened out from further analysis, including 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.

The Proposed Project would fall under Tier 1 of the City's screening criteria and is screened out from further VMT analysis. VMT analysis and comparison of the Proposed Project against the significance thresholds are not required (see also Appendix K). The Proposed Project would not increase the student or employment population at McKinley ES, and the attendance boundaries of the school would not change; the Proposed Project would not result in more vehicle trips to and from the school during operation of the Proposed Project when compared to existing conditions. In addition, the Proposed Project would not modify primary site access locations and traffic patterns—which could potentially result in an increase in the average trip lengths. Therefore, impacts related to VMT associated with full buildout of the Proposed Project would be considered **less than significant**.

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Impact 5.12-3: The Proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). [Thresholds T-3]

Construction

Construction of the Proposed Project would occur over three phases beginning in the summer of 2023 and ending in the summer of 2028. Construction activities would involve demolition, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, landscaping, and parking lot improvements. All construction staging would be located within the boundaries of the existing campus. Construction of the Proposed Project would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to the campus as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the campus would require several oversized vehicles that may travel at slower speeds than existing traffic. Construction traffic would be scheduled in concert with the operations of the school, ensuring that trucks are not moving in or out during drop-off or pick-up times.

Construction activities would require the hauling of heavy equipment (e.g., bulldozers, excavators, etc.) and operation of large trucks on the surrounding roadway network. Some of the roadways surrounding the campus (e.g., Arizona Avenue, Chelsea Avenue, and 23rd Court) have limited lane width and sharp curves at intersections. Haul trips and equipment deliveries often use large trucks, which may temporarily cause hazards, such as sudden stops and queuing, on these roadways during delivery and removal. Additionally, construction may require temporary closures of the public right-of-way adjacent to the campus or increase safety hazards due to construction vehicles entering and exiting the campus (e.g., for delivery of building materials). Therefore, this impact would be **potentially significant**.

During construction of the Proposed Project, implementation of **Mitigation Measure T-1** would require the construction contractor to prepare and implement a Construction Management Plan (CMP) 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 the implementation of **Mitigation Measure T-1**, the Proposed Project would not substantially increase hazards due to a design feature or incompatible use. Impacts during construction would be reduced to **less than significant**.

Operation

The Proposed Project involves a school modernization and is a compatible use with the existing school uses. The new onsite DOPU lane to be developed during Phase 1 would relocate DOPU operations that are currently curbside on Chelsea Avenue to a new internal dedicated DOPU location off Chelsea Avenue. This includes two new egress driveways. The existing egress driveway at Chelsea Avenue would remain for Grades 1 through 5 DOPU operations, and a second new egress driveway would be constructed at the Office walkway to provide egress for transitional kindergarten-kindergarten (T-K/K) DOPU operations. Additionally, relocation of the

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staff parking lot to the northeast corner of the campus would separate parking-related traffic from DOPU operations, thereby minimizing hazards.

Phase 3 would shift the early education, visitors, and ADA parking area to the northeast corner of the campus (with the remaining spaces to the southeast corner along 23rd Court) and the provision of a new turnaround area at the northwest corner of the campus, east of Building C. The new turnaround area at the northwest corner of the campus would be provided via a new driveway on Chelsea Avenue located approximately 155 feet west of the intersection with Santa Monica Boulevard. This turnaround area is not anticipated to serve as a DOPU, but rather as a short-term area for deliveries and emergency access minimizing conflict with DOPU access. Relocation of the majority of staff and visitor spaces (78 spaces) to the northeast corner of the campus would separate parking-related traffic from DOPU operations.

Department of the State Architect (DSA) oversees the design of K-12 schools; thus, the Proposed Project would be required to meet the design and safety standards set forth by DSA including the provisions detailed in the California Code of Regulations, Title 24. The Proposed Project would be required to meet California Building Code requirements as established in DSA Interpretation of Regulations 11B-10 pertaining to Scoping and Path of Travel Upgrade Requirements for Facility Alteration, Addition and Structural Repair Projects. DSA reviews plans for public K-12 schools, community colleges, and certain other state funded building projects to ensure that plans, specifications, and construction comply with California's building codes (Title 24 of the California Code of Regulations); and thus, the Proposed Project would be subject to plan review ensuring the design and internal circulation would meet all applicable regulations related to design and operations. Additionally, at the start of each school year, all families are educated about the proper DOPU operations at the school, and DOPU areas are overseen by school staff. Crossing guards are also provided at the appropriate designated locations to ensure avoidance of hazards.

Implementation of the Proposed Project would not require the construction, re-design, or alteration of any public roadways and the types of vehicles accessing the campus during operational activities would be consistent with existing conditions (i.e., passenger vehicles and buses). The Proposed Project would be consistent with all City design and safety standards including those set forth in the Municipal Code. Article 7 of the Municipal Code pertains to public works. Specifically, Section Chapter 7.04 establishes the standards required for street improvements, including Section 7.04.180 which address driveways from public streets into private property. Additionally, the Proposed Project would comply with Municipal Code Chapter 9.28, which details the standards for parking, loading, and circulation including access and dimension requirements. Pedestrian and bicyclist safety and circulation is also addressed in this section of the Municipal Code to ensure sight distances, sidewalk width requirements, and other access standards are met. Therefore, impacts related to hazards are considered **less than significant**.

Impact 5.12-4: The Proposed Project would not result in inadequate emergency access. [Threshold T-4]

Construction

As discussed above, the campus is accessible via Santa Monica Boulevard, Arizona Avenue, Chelsea Avenue and 23rd Court. The campus would continue be accessible to emergency responders via these streets including

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SMFD during construction and operation of the Proposed Project. Construction activities would involve demolition, grading and excavation, trenching for site utilities and irrigation, building construction, architectural coatings, driveway and walkway construction, landscaping, and parking lot improvements. All construction staging would be located within the boundaries of the existing campus. Construction of the Proposed Project would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to the campus as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the campus would require several oversized vehicles that may travel at slower speeds than existing traffic. Construction traffic would be scheduled in concert with the operations of the school, ensuring that trucks are not moving in or out during drop-off or pick-up times.

Construction activities would require the hauling of heavy equipment (e.g., bulldozers, excavators, etc.) and operation of large trucks on the surrounding roadway network. Some of the roadways surrounding the campus (e.g., Arizona Avenue, Chelsea Avenue, and 23rd Court) have limited lane width. Haul trips and equipment deliveries often use large trucks, which may temporarily cause hazards, such as sudden stops and queuing, on these roadways during delivery and removal. Additionally, construction may require temporary closures of the public right-of-way adjacent to the campus or increase safety hazards due to construction vehicles entering and exiting the campus (e.g., for delivery of building materials). Construction contractors would be required to comply with all City standard conditions pertaining to construction including work hours, haul route, and access. Therefore, this impact would be **potentially significant**. Implementation of **Mitigation Measure T-1** would be required to ensure adequate emergency access during construction.

Operation

The Proposed Project would comply with all applicable local requirements related to emergency vehicle access and circulation. Project-related increase in traffic within the Proposed Project's Site and on surrounding roadways would not be sufficient to affect emergency response in the area. To address fire and emergency access needs, the Proposed Project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and Fire Department. The Proposed Project would also be subject to review by DSA who oversees design and construction for K–12 schools. The Proposed Project would also be required to comply with all design standards established by DSA including Policy 07-03, "Fire Department and Emergency Access Roadways and School Drop-Off Areas." The purpose of this policy is to establish requirements based on State Fire Marshal Regulations contained in Titles 19 and 24 of the California Code of Regulations, and the California Vehicle Code for fire and emergency access roadways on public school or community college campuses, including fire and emergency access roadways combined with student drop-off and pick-up areas. DSA would review project plans to ensure that plans, specifications, and construction comply with California's building codes (Title 24 of the California Code of Regulations). As such, the Proposed Project would be subject to DSA plan review thereby ensuring the proposed design and internal circulation would meet all applicable regulations prior to issuance of building permits. Therefore, impacts associated with operational emergency access would be **less than significant**.

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5.12.4 Mitigation Measures

Impacts 5.12-2 and 5.12-4

- T-1** Before the start of construction of phase, the SMMUSD shall work with the City of Santa Monica Public Works Department to develop and implement a Construction Management Plan that is specific to the needs of each phase. The Construction Management Plan shall include a Temporary Traffic Control Plan (TTCP) to address anticipated impacts to or closures of public rights-of-way. The Construction Management Plan (including the TTCP) shall be submitted to the City Public Works Department for approval prior to construction of each phase of the Proposed Project. The TTCP shall demonstrate appropriate traffic handling during construction activities for all work that could impact the traveling public (e.g., the transport of equipment and materials to the campus area). The TTCP shall minimize hazards through industry-accepted traffic control practices. At a minimum, the TTCP shall require the contractor to do the following:
- Strictly adhere to the construction noise restrictions per Section 4.12.110 of the Santa Monica Municipal Code. Construction and demolition work times are: Monday through Friday, 8:00 a.m. until 6:00 p.m.; Saturdays 9:00 a.m. until 5:00 p.m. No construction or demolition is allowed on Sundays and holidays.
 - Obtain transportation permits necessary for oversize and overweight load haul routes and follow regulations of the applicable jurisdiction for transportation of oversized and overweight loads;
 - Provide adequate signage and traffic flagger personnel, if needed, to control and direct traffic for deliveries, if they could preclude free flow of traffic in both directions or cause a temporary traffic hazard; prohibit deliveries of heavy equipment and construction materials during periods of heavy traffic flow (i.e., 30 minutes before or after school start and end times);
 - Develop a Traffic Education Program to assist in educating parents, students, and staff on drop-off/pick-up procedures specific to each phase of construction that includes informational materials regarding student drop-off and pick-up procedures via regular parent/school communication methods and posted on the school website;
 - Utilize portable message signs and information signs at construction sites as needed;
 - Coordinate with the responsible agency departments, including the City of Santa Monica Public Works and Planning Departments, and the City of Santa Monica Fire Department no less than 10 days prior to the start of the work for each phase including specifying whether any temporary vehicle, pedestrian, or bicycle construction detours are needed, if construction work would encroach into the public right-of-way, or if temporary use of public streets surrounding the campus is needed; and

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- Review all existing emergency access and evacuation plans and identify procedures for construction area evacuation in the case of an emergency declared by local authorities.
- Additionally, the District shall ensure that the construction contractor follows all applicable requirements and regulations established in the City of Santa Monica Procedures and Requirements for Temporary Traffic Control Plans to ensure the TTCP is prepared to City standards and approved as necessary.

5.12.5 Level of Significance After Mitigation

Mitigation Measure T-1 would reduce potential impacts associated with construction-related circulation, hazards, and safety issues to a level that is **less than significant**

5.12.6 Cumulative Impacts

The temporary and short-term construction-related traffic impact associated with the Proposed Project would be related to truck routes and construction area access routes used by Proposed Project workers and material haulers, and potential increased traffic safety hazards. In conjunction with other projects occurring within the Project area, significant cumulative impacts could occur if construction activities (i.e., truck and worker trip-generating activities) for those other projects were to overlap (in time and place) with the proposed Project. The Proposed Project would require the implementation of **Mitigation Measure T-1** requiring a TTCP for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. The District will encourage its contractor to limit construction-related trucks to off-peak commute periods, avoiding cumulatively impacts by having vehicle trips scheduled for times where other vehicles would not be on the road. As such, the Proposed Project's contribution to any transportation and traffic-related cumulative impacts during construction would not be cumulatively considerable and the associated cumulative impacts would be less than significant.

5.12.7 References

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Santa Monica, City of. 2015, July 24. *Santa Monica Land Use and Circulation Element*.

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