

1.0 INTRODUCTION [EXECUTIVE SUMMARY TABLE OF IMPACTS ES0-1 DOES NOT IDENTIFY CULTURAL RESOURCES OR TRIBAL RESOURCES AS CUMULATIVELY CONSIDERABLE AND UNAVOIDABLY IMPACTED. MAKE CORRECTIONS IN SECTION 3.0.]

This Final Environmental Impact Report (EIR) was prepared in accordance with and in fulfillment of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. In accordance with CEQA Guidelines Section 15089, the Santa Monica-Malibu Unified School District (SMMUSD or District), as the lead agency, must prepare a Final EIR before approving Proposed Project. The purpose of this Final EIR is to provide an opportunity for the lead agency to respond to comments provided by the public and agencies regarding the Draft EIR for the proposed Santa Monica High School (Samohi) Campus Plan (SCP or Proposed Project). Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a list of persons, organizations, and agencies commenting on the Draft EIR; responses of the District to points raised in the review of the Draft EIR; and revisions to the Draft EIR.

The SCP for the existing 26-acre campus defines the redevelopment or renovation of all campus facilities, with the exception of Barnum Hall and the Innovation Building, phased over a 25-year planning horizon.

This Final EIR constitutes the second part of the EIR for the Proposed Project and is intended to be a companion to the Draft EIR. The Draft EIR for the Proposed Project, which circulated for public review and comment from November 30, 2018, through January 16, 2019, constitutes the first part of the EIR and is incorporated by reference and bound separately.

1.1 ORGANIZATION OF THE FINAL EIR

This Final EIR is organized in the following manner:

- Section 1.0 – Introduction

This section provides an introduction to the Final EIR and identifies the contents of the Final EIR. Also included in this section are the overview of the public review process that was completed for the Proposed Project, a summary of the Proposed Project, and areas of concern.

- Section 2.0 – Comments and Responses to Comments

This section includes a list of the parties that commented on the Draft EIR. This list is followed by the comment letters, which have been given a number, along with the individual comments within the letters bracketed and also assigned numbered.

- Section 3.0 – Revisions to the Draft EIR

This section includes revisions to the Draft EIR to make corrections or clarifications following public comment.

1.2 PUBLIC REVIEW PROCESS

Pursuant to the requirements of CEQA, the environmental review process for the Proposed Project commenced with solicitation of comments from identified response and trustee agencies, as well as interested parties and members of the public, on the scope of the Draft EIR through a Notice

1.0 INTRODUCTION

of Preparation (NOP) process. In accordance with CEQA Guidelines Section 15082, the District prepared a NOP for the Proposed Project and issued the notice on October 26, 2017, for a review period through November 27, 2017. The NOP was circulated to the public, local, state, and federal agencies, and other interested parties to solicit comments on the scope of the Draft EIR.

Consistent with the requirements of CEQA Guidelines Sections 15087 and 15105, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research (OPR), and was circulated for a 47-day public comment period commencing on November 30, 2018, through January 16, 2019. Following the Draft EIR public comment period, this Final EIR has been prepared and includes the responses to the comments raised regarding the Draft EIR.

1.3 OVERVIEW OF THE PROJECT

1.3.1 EXISTING USES

The Samohi campus, which is approximately 26 acres in size, is located at 601 Pico Boulevard in the City of Santa Monica and is the only comprehensive high school in Santa Monica. It is located generally south of the intersection of Olympic Boulevard and Lincoln Boulevard, approximately 100 feet south of Interstate 10 (I-10) and approximately 3.5 miles southwest of Interstate 405 (I-405). I-10 becomes State Route 1 (SR-1, Pacific Coast Highway) approximately 800 feet west of the campus. The Pacific Ocean is approximately one-half mile to the southwest of the campus.

The current campus comprises the following facilities:

- **Academic:** Innovation, Business, Art, History, Language, English, and Music buildings
- **Cultural:** Barnum Hall and the Memorial Open-Air Theater (commonly known as the Greek Amphitheatre)
- **Indoor Athletic:** north gymnasium (North Gym), natatorium (pool), and south gymnasium (South Gym)
- **Outdoor Athletic:** lighted football field/track, lighted baseball/softball/soccer field, seven tennis courts, and two and one-half basketball courts
- **Support:** Administration Building, cafeteria, Utility Building, grounds building, outdoor gathering space, and campus parking

Circulation between and among the buildings is provided via concrete pedestrian walkways, stairways, and ramps. Enclosed pedestrian bridges, walkways, and stairways allow for additional circulation between some buildings. The campus perimeter is defined primarily by concrete walls, concrete block walls, and chain-link fencing. The area around the recently completed Innovation Building includes stucco-clad walls, metal fencing, and passenger loading areas. A red brick retaining wall occurs at the south side of the football field/track, along Pico Boulevard just east of 7th Street.

1.3.2 PROPOSED USES

Given that the campus was first developed over 100 years ago and has since undergone many changes, the current campus layout does not meet the needs of Samohi's academic curriculum and often conflicts with desired classroom organization. The primary goal of the Proposed Project is to provide the best possible secondary school environment in a reconceived campus to shape

a model high school for approximately 3,100 students. The SCP is intended to provide a high-quality 21st century learning environment for the next 100 years. It plans for expanded and enhanced facilities for academia, performance arts and programs, physical education/ athletics, and campus services.

The District proposes to redevelop and renovate all Samohi campus facilities, with the exception of Barnum Hall and the Innovation Building, phased over a 25-year planning horizon. The Proposed Project would be implemented in nine phases and would result in the demolition of approximately 272,763 square feet of existing classroom buildings, 74,738 square feet of renovations, and the development of approximately 478,938 square feet of new buildings and 621,642 square feet of new structured parking and athletic fields. Additionally, the existing English/Humanities Building would be renovated and repurposed. The Greek Amphitheater's concrete radial seating area and stage would also be renovated. The buildout would result in the total construction of approximately 1,448,081 square feet of new classrooms, parking structures, fields, and other support facilities on the Samohi campus. Construction would also include the development of nine Utility Corridors that would provide electrical, data, gas, water, sewer, and stormwater connections throughout the SCP development phases.

1.3.3 LIST OF DISCRETIONARY ACTIONS

The District, as lead agency pursuant to CEQA Guidelines Section 15367, has the principal responsibility for approving the Project. Approvals required for development of the Proposed Project are anticipated to include, but not be limited to, the following:

- Caltrans approval of an encroachment permit to modify an existing freeway divider at the top off-ramp to prevent access onto the campus from the off-ramp; curb-cuts and access to 6th Street; modifications to and partial demolition of the existing retaining wall along the south side of Olympic Boulevard;
- State Fire Marshal approval of code analysis;
- Utility providers issuance of utility connection permits;
- City of Santa Monica Fire Department issuance of fire permits; and
- City of Santa Monica issuance of grading permits.

1.4 AREAS OF CONCERN

Based on the Draft EIR comment letters received regarding the Draft EIR, which are included in Section 2.0, Comments and Responses to Comments, of this Final EIR, issues known to be of concern include the following:

- Design of roadway improvements;
- Handling of hazardous materials; and
- Compliance with the Los Angeles County Metropolitan Transportation Authority's Congestion Management Program (CMP) Guidelines.

2.0 COMMENTS AND RESPONSES TO COMMENTS**2.1 INTRODUCTION**

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final EIR provides the responses prepared by the District to each of the written comments received regarding the Draft EIR.

2.2 COMMENTS RECEIVED ON THE DRAFT EIR

This section includes all written responses received on the Draft EIR and the District's responses to each comment. Comment letters and specific comments are given numbers for reference purposes.

The following is a list of agencies that submitted comments on the Draft EIR during the public review period.

Number Reference	Commenting Agency	Date of Comment Letter	Page Number
1	California Office of Planning and Research, State Clearinghouse	January 15, 2019	2.0-2
2	California Department of Transportation, District 7 (Caltrans)	January 9, 2019	2.0-9
3	California Department of Toxic Substances Control (DTSC)	December 10, 2018	2.0-12
4	Los Angeles County Metropolitan Transportation Authority (Metro)	January 2, 2019	2.0-16

2.0 COMMENTS AND RESPONSES TO COMMENTS

COMMENT LETTER No. 1



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



January 15, 2019

Carey Upton
Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405

Subject: Santa Monica High School Campus Plan Project
SCH#: 2017101057

Dear Carey Upton:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 14, 2019, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

1-1

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017101057
Project Title Santa Monica High School Campus Plan Project
Lead Agency Santa Monica-Malibu Unified School District

Type EIR Draft EIR

Description The proposed project for the entire existing campus is the Blue Concept, which consists of redevelopment or renovation of nearly all campus facilities, with the exception of Bamum Hall and the Innovation Building, phased over 25 years and would be implemented in 9 phases, resulting in the demolition of approx 367,567 sf of existing classroom buildings; development of approx 317,534 sf of new buildings; renovation and repurposing 33,963 sf of existing classroom buildings, renovation of the Greek Theater's concrete radial seating area; and construction of approx 1,523,818 sf of new parking structures, fields, and other support facilities on the campus.

Lead Agency Contact

Name Carey Upton
Agency Santa Monica-Malibu Unified School District
Phone (310) 399-5865 ext. 79383 **Fax**
email
Address 2828 4th Street
City Santa Monica **State** CA **Zip** 90405

Project Location

County Los Angeles
City Santa Monica
Region
Lat / Long 34° 00' 41" N / 118° 29' 07" W
Cross Streets 601 Pico Boulevard between 4th Street and 7th Street
Parcel No. 4281-006-900
Township 1 **Range** 16W **Section** **Base**

Proximity to:

Highways 10 (Santa Monica Fwy), SR 1
Airports Santa Monica Municipal
Railways Metro Expo Line
Waterways Pacific Ocean
Schools Santa Monica High
Land Use LU/Z is institutional/public lands and GPD; institutional/PL

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Resources, Recycling and Recovery

Date Received 11/29/2018 **Start of Review** 11/29/2018 **End of Review** 01/14/2019

Note: Blanks in data fields result from insufficient information provided by lead agency.

2.0 COMMENTS AND RESPONSES TO COMMENTS

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

January 9, 2019

Carey Upton
Chief of Operations
Santa Monica - Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405

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Governor's Office of Planning & Research

JAN 10 2019

STATE CLEARINGHOUSE

RE: Santa Monica High School Campus Plan
Draft Environmental Impact Report
SCH # 2017101057
GTS # 07-LA-2017-02071
Vic. LA / 1 / R 34.71

Dear Ms. Upton:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Santa Monica High School Campus project. The proposed project consists of a 26-acre project site located at 601 Pico Boulevard Santa Monica, CA. The project involves a nine (9) phase plan to redevelop/renovate nearly all campus facilities (except for Barnum Hall and Innovation Building) over 25 years. This project would result in the demolition of 367,567 sq. ft of existing classroom buildings, renovating/purposing 33,963 sq. ft of existing classroom buildings (as well as renovating the Greek Theaters concrete seating area), development of ~317,534 sq. ft of new buildings, and 1,523,818 sq. ft of new parking structures, fields, and other support facilities on the campus.

1-3

Upon review of this Draft EIR, Caltrans has the following comments:

- Recognizing the realignment of 6th Street, Caltrans supports the decision to realign the concrete median on the I-10 Eastbound Off-ramp. This design element will increase safety of motorists by reducing potential traffic conflicts between vehicles entering 6th Street and I-10 Off-ramp. Please keep in mind this design will need to be approved by Caltrans since it is within state Right-of-Way and an encroachment permit will need to be acquired from Caltrans.

- As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Caltrans looks forward to reviewing your future environmental documents and preliminary design

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Ms. Upton
January 9, 2019
Page 2 of 2

1-3
(cont.)

proposals for project elements. If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2017-02071

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

2.0 COMMENTS AND RESPONSES TO COMMENTS



Matthew Rodriguez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Edmund G. Brown Jr.
Governor

December 10, 2018

11/14/2019
E

Governor's Office of Planning & Research

JAN 07 2019
STATE CLEARINGHOUSE

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SANTA MONICA HIGH SCHOOL CAMPUS PLAN (PROJECT)

Dear Carey Upton:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of Draft Environmental Impact Report (EIR) for the above-mentioned project.

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

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

1-4

Carey Upton
December 10, 2018
Page 2

1-4
(cont.)

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

2.0 COMMENTS AND RESPONSES TO COMMENTS

COMMENT LETTER No. 1

Scott Morgan, Director
State Clearinghouse and Planning Unit
California Governor's Office of Planning and Research
1400 Tenth Street
P.O. Box 3044
Sacramento, CA 95812-3044

Response to Comment No. 1-1

This comment acknowledges receipt of the Draft EIR by the State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, and compliance with State Clearinghouse review requirements for draft environmental documents in accordance with the requirements of CEQA. This comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Response to Comment No. 1-2

This comment includes the Document Details Report from the State Clearinghouse, which displays basic information regarding the Draft EIR and Lead Agency contact information as set forth in the State Clearinghouse Data Base.

Response to Comment No. 1-3

Comment Letter No. 1 includes a compilation of comment letters provided to and aggregated by the State Clearinghouse. This comment letter compilation includes a letter from the California Department of Transportation, District 7 (Caltrans). The Lead Agency received a duplicate comment letter directly from Caltrans, which is identified in this Final EIR as Comment Letter No. 2. As such, the comments provided in this letter are addressed in the responses to Comment Letter No. 2.

Response to Comment No. 1-4

As previously described, Comment Letter No. 1 includes a compilation of comment letters provided to and aggregated by the State Clearinghouse. This comment letter compilation includes a letter from the California Department of Toxic Substances Control (DTSC). The Lead Agency received a duplicate comment letter directly from DTSC, which is identified in this Final EIR as Comment Letter No. 3. As such, the comments provided in this letter are addressed in the responses to Comment Letter No. 3.

COMMENT LETTER No. 2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

January 9, 2019

JAN 14 2019 PM 02:45

Carey Upton
Chief of Operations
Santa Monica - Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405

RE: Santa Monica High School Campus Plan
Draft Environmental Impact Report
SCH # 2017101057
GTS # 07-LA-2017-02071
Vic. LA / 1 / R 34.71

Dear Ms. Upton:

2-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Santa Monica High School Campus project. The proposed project consists of a 26-acre project site located at 601 Pico Boulevard Santa Monica, CA. The project involves a nine (9) phase plan to redevelop/renovate nearly all campus facilities (except for Barnum Hall and Innovation Building) over 25 years. This project would result in the demolition of 367,567 sq. ft of existing classroom buildings, renovating/purposing 33,963 sq. ft of existing classroom buildings (as well as renovating the Greek Theaters concrete seating area), development of ~317,534 sq. ft of new buildings, and 1,523,818 sq. ft of new parking structures, fields, and other support facilities on the campus.

Upon review of this Draft EIR, Caltrans has the following comments:

2-2

- Recognizing the realignment of 6th Street, Caltrans supports the decision to realign the concrete median on the I-10 Eastbound Off-ramp. This design element will increase safety of motorists by reducing potential traffic conflicts between vehicles entering 6th Street and I-10 Off-ramp. Please keep in mind this design will need to be approved by Caltrans since it is within state Right-of-Way and an encroachment permit will need to be acquired from Caltrans.

2-3

- As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

2-4

Caltrans looks forward to reviewing your future environmental documents and preliminary design

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to enhance California's economy and livability."*

2.0 COMMENTS AND RESPONSES TO COMMENTS

Ms. Upton
January 9, 2019
Page 2 of 2

2-4
(cont.)

proposals for project elements. If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2017-02071

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

COMMENT LETTER No. 2

Miya Edmonson
IGR/CEQA Branch Chief
California Department of Transportation
District 7, Office of Regional Planning
100 South Main Street, MS 16
Los Angeles, CA 90012

Response to Comment No. 2-1

The comment provides a summary of the Project and does not directly address the content of the Draft EIR.

Response to Comment No. 2-2

Caltrans' statement of support for the realignment of the concrete median on the I-10 eastbound off-ramp with the realignment of 6th street as part of the Project is noted for the administrative record. This design feature is incorporated into the Project to reduce potential conflicts between vehicles accessing the realigned 6th street Driveway and vehicles exiting I-10 at the eastbound off-ramp to Lincoln Boulevard. Please refer to page 3.11-17, Section 3.11.4, Project Design Features, of the Draft EIR for a description of the median realignment. Caltrans states that the design of the realigned concrete median will need to be approved by Caltrans. This approval is noted in Table 2.0-8, Permits/Approvals Anticipated, on page 2.0-86 of the Draft EIR. Caltrans also states that an encroachment permit will need to be acquired for the median realignment. The requirement for an approved encroachment permit from Caltrans is discussed on page 3.11-17, Section 3.11.4, Project Design Features, of the Draft EIR.

Response to Comment No. 2-3

In the comment letter, Caltrans states that any transportation of heavy equipment and/or oversized-transport vehicles on State highways associated with the project would require a Caltrans transportation permit. Refer to page 3.11-40, Mitigation Measure TR-2, Construction Staging and Traffic Management Plan. The Construction Staging and Traffic Management Plan would identify all the permits that would be required during Project construction, including a transportation permit from Caltrans for the use of oversized-transport vehicles on State highways.

Response to Comment No. 2-4

This comment provides contact information for a Caltrans representative in case the District has further questions about the comments included in the Caltrans comment letter. This information is noted for the administrative record and has been forwarded to the decision-makers for review and consideration.

2.0 COMMENTS AND RESPONSES TO COMMENTS

COMMENT LETTER No. 3



Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



December 10, 2018

Carey Upton
Chief Operations Officer
Santa Monica-Malibu Unified School District
2828 4th Street
Santa Monica, CA 90405

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SANTA MONICA HIGH
SCHOOL CAMPUS PLAN (PROJECT)

Dear Carey Upton:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of Draft Environmental Impact Report (EIR) for the above-mentioned project.

3-1

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

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

3-2

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

3-3

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

3-4

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

♻️ Printed on Recycled Paper

Carey Upton
December 10, 2018
Page 2

3-5

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

2.0 COMMENTS AND RESPONSES TO COMMENTS

COMMENT LETTER No. 3

Pete Cooke
Site Mitigation and Restoration Program – Chatsworth Office
California Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, CA 91311

Response to Comment No. 3-1

Refer to page 3.6-1, Section 3.6, Hazards and Hazardous Materials, of the Draft EIR for a detailed description of current or historic uses at the project site that have resulted in any release of hazardous wastes/substances at the project area. Section 3.6 details findings of the Phase I Environmental Site Assessment (ESA) and the Phase II (ESA), such as findings of hazardous material surveys of the project site, a review of information and data on historic uses of the project site, and record searches of regulatory databases for hazardous sites. For a description of findings from the Phase I and Phase II ESAs (Refer to Appendix H), including the seven Recognized Environmental Concerns (RECs) identified on the Project site, refer to page 3.6-9, Table 3.6-3, RECs/Hazardous Impacts by Construction Phase.

Response to Comment No. 3-2

Refer to page 3.6-1, Section 3.6 of the Draft EIR, which details findings of the Phase I and Phase II ESAs. These findings include results from hazardous material surveys of the project site, a review of information and data on historic uses of the project site, and record searches of regulatory databases for hazardous sites on and immediately surrounding the project site. The Phase II ESA is available as Appendix H of the Draft EIR. Further, the results of file reviews and interviews with local and State regulatory agencies, which provide historical information about environmental permits, presence of underground storage tanks, environmental violations of incidents, and/or the status of enforcement actions at the project site, are available on page 3.6-6, Agency Records Review of the Draft EIR. Page 3.6-7, Prior Reports for the Project site describes the results of asbestos, lead-based paint, and hazardous materials surveys on the project site, as well as a records search for any environmental liens on the project site that would establish use limitations. The above-mentioned sections of the Draft EIR address the information referenced by the Department of Toxic Substances Control (DTSC) as required in the Draft EIR.

Response to Comment No. 3-3

Refer to table 3.6-3, RECs/Hazardous Impacts by Construction Phase on page 3.6-9 of the Draft EIR, which displays Phase I and Phase II ESA findings. There are two RECs that occur in Phases 3, 4, 5, 6 and 7 of the Project, including REC-3 Lead-Based Paint Residue in Shallow Soil, and REC-7, Pesticides in Shallow Soil. The Draft EIR identifies mitigation measures for Phase 1 through Phase 7 on pages 3.6-33 through 3.6-36, which include the government agency which will provide appropriate regulatory oversight.

Response to Comment No. 3-4

The Phase I and Phase II ESAs identified two RECs that occur in Phases 3, 4, 5, 6 and 7 of the Project, including REC-3 Lead-Based Paint Residue in Shallow Soil, and REC-7, Pesticides in Shallow Soil. Further, soil contamination is addressed through Mitigation Measure HAZ-5, Removal Action Workplan, and Mitigation Measure HAZ-6, Soil Sampling and Testing for Exterior Lead-Based Paints and Pesticide Compounds, as detailed on page 3.6-34 of the Draft EIR. With implementation of

these mitigation measures, as well as compliance with laws and regulations governing the disturbance and/or disposal of potentially contaminated soil during demolition and grading described in Section 3.6.2, Regulatory Setting on page 3.6-21 of the Draft EIR, impacts of the Proposed Project would be less than significant.

Response to Comment No. 3-5

As stated in the response to Comment No. 3-4, there are two RECs that occur in Phases 3, 4, 5, 6, and 7 of the Project, including REC-3 (Lead-Based Paint Residue in Shallow Soil) and REC-7 (Pesticides in Shallow Soil). The District would implement Mitigation Measures HAZ-5, Removal Action Workplan, and Mitigation Measure HAZ-6, Soil Sampling and Testing for Exterior Lead-Based Paints and Pesticide Compounds, as detailed on page 3.6-34 of the Draft EIR and consult the VCP Guidance provided by DTSC. With implementation of these mitigation measures, as well as compliance with laws and regulations governing the disturbance and/or disposal of potentially contaminated soil during demolition and grading described in Section 3.6.2, Regulatory Setting on page 3.6-21 of the Draft EIR, impacts of the Proposed Project would be less than significant.

2.0 COMMENTS AND RESPONSES TO COMMENTS

COMMENT LETTER No. 4

From: "Hallman, Jordan" <HallmanJ@metro.net>
Date: January 2, 2019 at 3:39:24 PM PST
To: "cunton@smmusd.org" <cunton@smmusd.org>
Cc: "Sheridan, Georgia" <SheridanG@metro.net>, "Zepeda, Eddi" <ZepedaEd@metro.net>
Subject: DEVREV: Santa Monica High School Campus Plan

Hello,

Please find Metro's comments for the Santa Monica High School Campus Plan Draft EIR attached.

Best,

Jordan Hallman

LA Metro

Transportation Planner

Transit Oriented Communities

213.922.5517 W

213.922.2228 F

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Metro provides excellence in service and support

4-1



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Metro

Congestion Management Program

4-2

Metro must notify the Project Sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

4-3

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions, please contact David Lor by phone at 213-922-2883, by email at lord@metro.net, or by mail at the following address:

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One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952

APPENDIX

D

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- ☐ Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- ☐ Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- ☐ Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

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D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- ☐ All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- ☐ If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- ☐ Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- ☐ Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

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be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

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Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

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(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

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D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- ☐ The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- ☐ The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

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D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ☐ Evidence that affected transit operators received the Notice of Preparation.
- ☐ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ☐ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ☐ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ☐ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

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- ☐ Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- ☐ Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- ☐ Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- ☐ Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- ☐ Any project contribution to the improvement, and
- ☐ The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

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(cont.)

D.10 REFERENCES

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(cont.)

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

2010 Congestion Management Program for Los Angeles County

COMMENT LETTER No. 4

David Lor
Metro Development Review
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-23-2
Los Angeles, CA 90012-2952

Response to Comment No. 4-1

This comment includes the e-mail transmittal of the comment letter from Los Angeles County Metropolitan Transportation Authority (Metro).

Response to Comment No. 4-2

A Traffic Impact Analysis (TIA) was prepared for the Proposed Project and is available for review as Appendix K of the Draft EIR. The TIA is in compliance with the Congestion Management Program (CMP) Guidelines provided by Metro in their comment letter.

Response to Comment No. 4-3

As stated in the response to Comment No. 4-2, a TIA compliant with the CMP Guidelines provided by Metro, was prepared for the Proposed Project and is available for review as Appendix K of the Draft EIR. The TIA did not identify any facilities for study based on the criteria provided in the comment letter. As such, no further traffic analysis beyond the TIA is required.

Response to Comment No. 4-4

The Congestion Management Program Guidelines (2010) are included with Metro's comment letter as an attachment. Refer to the response to Comment No. 4-2 for details regarding the proposed project's TIA and its compliance with these guidelines.

3.0 REVISIONS TO THE DRAFT EIR

In response to comments from the public and other public agencies, the Final EIR has incorporated changes subsequent to publication of the Draft EIR. The Final EIR includes corrections to the Draft EIR. A minor factual correction to the Draft EIR is identified herein in ~~strikeout text~~ to indicate a deletion.

1. Page 3.8-29, Section 3.8 of the DEIR, Noise, is hereby modified as follows:

Impacts would be less than significant for construction noise with implementation of mitigation measures **MM NOI-1** through **MM NOI-17**, and less than significant for construction groundborne vibration and off-site construction vehicle noise. Impacts would be less than significant for operational stationary source noise and operational groundborne vibration, and operational traffic noise). Cumulative construction noise impacts would be less than significant with mitigation, and less than significant for groundborne vibration and off-site construction vehicle noise, while cumulative operational impacts relative to stationary source noise and operational groundborne vibration would also be less than significant. ~~However, cumulative operational off-site traffic noise would be significant and unavoidable, as no mitigation measures are available that could reduce the significance of impacts.~~